

CCTV Policy

1.0	SCOPE
	Purpose
1.1.	This document sets out whg's policy relating to the use of its surveillance system, which comprises CCTV and Body Worn Video (BWV) equipment. It also includes the principles by which our CCTV and BWV equipment will be managed, including how and when we will provide access to recordings, and how we manage requests to install private CCTV equipment from customers.
1.2.	CCTV is a surveillance system that comprises cameras, BWV, recorders and viewing screens. We use digital recorders for recording and network cameras that provide greater installation flexibility. CCTV cameras may be placed in areas such as stairways, lifts, entrances communal areas and car parks. BWV is used by whg colleagues when carrying out their duties.
1.3.	CCTV schemes provide our customers, their visitors, our colleagues and contractors with added reassurance that their homes and neighbourhoods are safe and protected. However it is crucial for them to have confidence that we only use images and recordings from our surveillance cameras to protect and support them.
	Legal and regulatory framework
1.4.	This Policy is designed to comply with our legal and regulatory responsibilities.
1.5.	CCTV schemes that process personal data must conform to the Data Protection Act 2018 (DPA), the Human Rights Act 1998, The Freedom of Information Act 2000, and the Protection of Freedoms Act 2012. As a housing association, we are not subject to the Regulation of Investigatory Powers Act 2000.
1.6.	We will act in accordance with the Information Commissioners Office (ICO) code of practice for surveillance cameras and personal information covering the use of CCTV and the 'CCTV Code of Practice' issued by the Surveillance Camera Commissioner as required by the Protection of Freedoms Act 2012. We are registered with the ICO for the use of the CCTV for the detection of crime. Our Privacy Notice states that we will use CCTV and other camera footage, voice and video recordings for safety and crime reduction.

1.7.	We meet BS7958:2015 Closed Circuit Television (CCTV) – Management and operation – Code of Practice’, which supplements this legislation and codes of practice.
1.8.	We are licensed under the Security Industry Authority (SIA) to operate public space CCTV systems.
2.0	POLICY STATEMENT
	Our Response
2.1.	<p>We operate and monitor our CCTV services 24 hours a day, 365 days of the year. We will use CCTV recordings to;</p> <ul style="list-style-type: none"> • Prevent and detect criminal acts and anti-social behaviour in and around our homes and neighbourhoods; • Ensure safe environments for our colleagues and customers; • Protect our property and business interest; and • Investigate alleged breaches and tenancy.
2.2.	Individuals found to be responsible for criminal acts may then be the subject of enforcement action or prosecution.
2.3.	CCTV equipment may be requested by any whg colleague, but the final decision to deploy equipment will be made by specially trained whg colleagues who are licensed with the SIA.
	Use of Body Worn Video Equipment
2.4.	<p>Body Worn Video Equipment (BWV) is used for the purposes of reducing risk to colleagues and gathering evidence. Whg uses BWV that has audio and visual recording capability. It can be requested by any whg colleague but the decision to deploy the equipment will be made by colleagues who are licensed with the SIA.</p> <p>Some examples of where BWV would be used:</p> <ul style="list-style-type: none"> • On an adhoc basis, when dealing with specific incidents, for example evictions. • Prevent anti-social behaviour and detect criminal acts in and around our homes and neighbourhoods, especially when patrolling out of hours. • Ensure safe environments for our colleagues and customers • Protect our property and business interests.

	<ul style="list-style-type: none"> Investigate alleged breaches of tenancy.
2.5.	BWV is worn overtly, and where practicable the operative of the equipment will inform customers and anyone else present that they are being filmed.
2.6.	Customers or any other persons have the right to request not too be filmed but it will always be at the discretion of whg when to use BWV equipment and whether to proceed with any work or activity if a request is made to turn it off.
2.7.	Individuals found to be responsible for criminal acts or anti-social behaviour may then be the subject of enforcement action or prosecution.
	Installation
2.8.	We will consult relevant customers before overt CCTV equipment is installed. All CCTV cameras will be located in prominent positions within public view and they will not face directly into residents' property. Signage will be displayed at all locations featuring overt CCTV, informing both customers and the public that the area is under surveillance.
2.9.	The use of CCTV equipment will generally be overt but it may be necessary in some circumstances to use concealed equipment.
2.10.	Customers requesting to install their own CCTV systems including video doorbells must ask for permission in writing and receive permission as per our Home Improvement Policy.
	Images and recordings
2.11.	<p>We will ensure CCTV and BWV images and recordings are:</p> <ul style="list-style-type: none"> Kept securely for a maximum of 30 days. Where these are downloaded in connection with an incident they will be kept for as long as is necessary for the investigation in line with the DPA; Only viewed if there is sufficient justification; Restricted to whg colleagues with the appropriate authorisation and under appropriate supervision; and Only released to statutory enforcement agencies or individuals on receipt of a valid Data Subject Access Request or a Third Party Disclosure Request in line with our Data Protection Policy.

3.0	PERFORMANCE MEASURES
3.1.	We will respond to Data Subject Access Requests within a calendar month. Records of such requests will be kept by the Data Protection Officer.
3.2.	We will ensure continued compliance with the latest version of BS 7958
4.0	EQUALITY AND DIVERSITY
4.1	Our CCTV policy is inclusive for all genders. Through creating a consistent CCTV offer, we are not disadvantaging any customers.
5.0	TRAINING AND DISSEMINATION
5.1.	Colleagues within Community Safety, Community Housing and Neighbourhood Services will receive training via a team input regarding the content of the policy.
5.2.	All wider team colleagues have access to the policy through the internal whoogle communications webpage.
6.0	MONITOR AND REVIEW
6.1.	This Policy will be monitored by the Director of Housing and approved every three years by the Policy Group.
7.0	ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES
7.1	<p>Documents, policies and procedures associated with this Policy are:</p> <ul style="list-style-type: none"> • Data Protection Act (2018) • Regulation of Investigatory Powers Act (2000) • Protection of Freedoms Act (2012) • Prevention of Terrorism Act (2005) • Information Commissioners Office 'CCTV Code of Practice' (2014) • Home Office 'Surveillance Camera Code of Practice (June 2013) • Anti-Social Behaviour, Crime and Policing Act 2014 • Crime and Disorder Act 1998 • Equality Act 2010 • Human Rights Act 1998 • whg Anti-Social Behaviour Policy • whg Data Protection policy • whg Data Retention Policy

Document author	James Wall, Community Safety Operations Manager
Document owner	Gary Brookes, Director of Housing
Legal advice	Richard Dewsbery, Head of Legal Services
Consultation	Community Safety Team Community Housing Team Legal Services Team
Approved by	Policy Group - July 2022
Review Date	July 2025
Corporate Plan aim	<ul style="list-style-type: none">• To deliver high quality homes and services
Equality Assessment	26/05/2022 attached
Key changes made	No key changes