



Closed Circuit Television (CCTV) POLICY

CCTV POLICY

1. BACKGROUND

Manningham Housing Association (MHA) is a registered social housing provider. The Association provides general needs housing for rent and shared ownership.

This policy sets out how we will deploy and manage our Closed Circuit Television (CCTV) systems and outlines how we will meet data protection requirements.

2. KEY PRINCIPLES

- We use CCTV surveillance systems for legitimate business purposes in order to:
 - deter and detect crime and anti-social behaviour;
 - improve community safety;
 - protect buildings and assets from damage, disruption, vandalism;
 - assist in day-to-day management, including ensuring the health and safety of staff and others; and to
 - assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- We comply with Information Commissioners Officer (ICO) Guidance on video surveillance (including CCTV).
- We operate as a Data Controller, in that we make decisions on how the system is used and the information managed.

3. REGULATORY AND LEGAL FRAMEWORK

- Data Protection Act 2018 and the UK GDPR
- Human Rights Act 1998
- Regulator of Social Housing - Regulatory Standards
- The Protection of Freedoms Act 2012
- Information Commissioner Office – Video surveillance guidance (including CCTV)
- Home Office - Surveillance Camera Code of Practice

4. CCTV LOCATIONS

We currently have CCTV in operation that covers the following sites:

- MHA Main Office - Bank House
- Anchor Court
- St Mary's Magdalene's Close
- Woodcross Court
- Penzance Court
- Jinnah Court

This list is not exhaustive and other sites may be included if needed.

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a data protection impact assessment (DPIA).

A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

Monitoring

- CCTV monitoring varies from site to site, however, it is usually the communal areas of the building, and both the main entrance and secondary exits.
- We will ensure no cameras will be hidden from view and will not focus on any private areas such as toilets or changing rooms.
- Signs will be prominently placed at strategic points and at entrance and exit points of the sites to advise residents, visitors, and members of the public that a CCTV system is in operation.
- The system will be passively monitored and will not be used to record sound.
- Where CCTV cameras are placed in the workplace, we will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded
- No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms or toilets)

Storage of images

- To ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that Personal Data gathered from CCTV cameras is stored in a way that maintains its integrity and security
- Images will be stored either on site or remotely using secure digital recorders.

Personal Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough

only for incidents to come to light or if we are replying to a Subject Access Request. In all other cases, recorded images will be kept for no longer than 90 days.

Access to images

- Only nominated persons will have access to images. This will include the Corporate Project Manager, Neighborhoods Team Leader, Neighbourhood Officers and the Heads of Property and Housing Services. CCTV will be only viewed, when necessary for example to detect or prevent crime. These nominated staffs have restricted access to personal information on a 'need to know' basis.
- Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following third parties:
 - Law enforcement agencies where images recorded may assist in a criminal enquiry and/or the prevention of terrorism and disorder and/or where a court order for disclosure has been produced;
 - Prosecution agencies;
 - Relevant legal representatives; or
 - Emergency services in connection with the investigation of an accident
- We will maintain a record of all disclosures of CCTV footage.
- No images from CCTV will ever be posted online or disclosed to the media.

Subject Access Requests

Data subjects may make a request for disclosure of their personal information and this may include CCTV images (data subject access request). A data subject access request is subject to the statutory conditions from time to time in place and should be made in writing.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

5. TRAINING AND SUPPORT FOR STAFF

Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

We will also ensure that all relevant staff are aware of this policy and procedure which will be reviewed in line with legislation and feedback from monitoring.

8 . MONITORING AND REVIEW

We will monitor and review this policy in conjunction with customers to ensure its effectiveness and relevance to the Association's stated aims and objectives.

The Head of Housing Services has overall responsibility for the on-going monitoring of the policy through the work of frontline staff, particularly those engaged in Neighbourhood Management. The policy will be reviewed every three years or sooner following significant legislative or regulatory changes or good practice requirements.

Policy Name	CCTV Policy
Policy Ref.	CE15
Date of Customer Panel Consultation	28.09.2021
Equality Impact Assessment Completed	Yes
Date Approved by the Executive / Leadership Team	November 2023
Date Approved by the Customer Experience Committee	December 2023
Next Full Review	November 2026
Lead Officers	Head of Housing Services / Data Privacy Manager