CCTV POLICY

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CCTV POLICY

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CCTV POLICY

1.0 Statement

This Policy is to determine Radcliffe Housing Society (RHS) will ensure:

- The use of Closed-Circuit Television (CCTV) adheres to the principles of the General Data Protection Regulation (GDPR) 2018, Human Rights Act 1998 and other relevant legislation
- Our CCTV system is not mis-used
- Our CCTV is correctly and efficiently operated

2.0 Aims

This policy aims to put residents at the heart of the business and to serve our communities.

3.0 Objectives

The principal objectives of our CCTV in operation is to:

- Help reduce the fear of crime and Anti-Social Behaviour (ASB) for residents, service users, visitors and support staff, particularly for those entering and leaving our premises
- Assist in the prevention and detection of crime, and ASB against both persons and property
- Facilitate the identification, apprehension and prosecution of offenders, in relation to crime and anti-social behaviour
- Ensure the use of CCTV is proportionate to the impact of ASB within the communities, in which we operate

4.0 Operations

4.1 Overt

Overt (unhidden) surveillance is carried out with the full knowledge of staff, residents and local people. This is a common method of deterring vandalism theft or anti-social behaviour. To ensure we comply with GDPR requirements:

- Cameras are in open display with signage around properties advertising their use
- Images are recorded on an ongoing basis, are not routinely monitored and are not stored for longer than necessary; (enough time to detect that a crime has taken place, usually 30 days)
- Images will only be viewed should an incident occur, or to monitor compliance with Court Orders and alleged perpetrators of ASB. This supports identification of the alleged perpetrator, and evidence in any subsequent warnings or prosecutions
- Viewings and downloads will only reviewed by trained staff
- Our system is date and time stamped accurately

4.2 Covert

Covert surveillance is when the cameras are not advertised and are hidden from view. This type of surveillance is used when other methods of gathering evidence of crimes have failed, such as tenancy fraud or ASB.

- Images are captured without the knowledge of residents or the community and are usually monitored as an ongoing process.
- No signs will be displayed

- There is no obligation to let the alleged perpetrator know

4.3 Routine covert surveillance is not carried out by RHS. We will only record sound via covert means, where justified, proportionate, and justified. Use of this type of surveillance must be authorised by our Operations Director.

4.4 Covert Surveillance may occasionally be carried out by RHS in relation to anti-social behaviour or criminal activity. This may or may not be in conjunction with the police. Whenever directed Covert surveillance is used, the guidance set out in "The Regulation of Investigatory Powers Act 2000" (RIPA) is followed.

4.5 We operate within the guidelines set out within the Surveillance Camera Code of Practice.

5.0 Monitoring

5.1 We must adhere to the following guidelines in order to conform to the code of practice:

- Cameras are not hidden from view, and signage informs the public of the presence, the purpose and ownership of the system
- Cameras are positioned to avoid infringing on the privacy of individuals not visiting the premises, and not involved in unlawful activity
- The systems are not subject to live monitoring or control, under routine activities
- Images recorded are retained for a maximum period of 30 days and are only viewed as listed (from 4.0 above). After 31 days, images are erased unless images relate to an ongoing investigation or legal case
- Images recorded, are secured safely and can only be viewed by authorised persons

5.2 All cameras and recording equipment are routinely checked at every estate inspection we carry out. We also service and maintain each individual camera by an independent and appropriate contractor.

5.3 Our Corporate Services Officer will monitor the number of instances where CCTV images have been requested. A named individual has responsibility for the management of the CCTV system.

5.4 Our residents have a legal right to view their images if we have recorded them overtly. We will ask that a Subject Access Request (SAR) is requested. We are not able to release images of other people, which could mean we're not able to share all, or any, images of the requestor.

5.5 We will keep a record when we:

- Review images
- Download images
- Disclose data legally to a third party
- Move the data to another location
- Process a Subject Access Request

6.0 Residents self-installing CCTV

6.1 Our residents must inform us before installing CCTV or a camera doorbell. We would encourage other solutions for security enhancements, including security lighting or neighbourhood watch schemes.

6.2 If residents install their own CCTV or a camera doorbell, they must:

- Comply with all relevant legislation, including GDPR requirements
- Ensure the coverage of the CCTV is for the sole property and does not cover any communal areas
- Ensure the doorbell does not record or save footage, if it covers a neighbouring property
- Not impede or compromise any building or fire safety requirements
- Not use any landlord electrical supply

6.3 If a resident breaches the terms above, we reserve the right to take enforcement action. This would mean asking a resident to remove the CCTV and / or doorbell. Failure to do so would mean a tenancy breach, and we reserve the right to take legal action to remove it.

7.0 Responsibilities

7.1 It is our responsibility as the Data Controller to be the overall owner of the CCTV scheme:

- To ensure compliance with this Policy
- To ensure compliance with the operating procedure at all times
- To ensure the key objectives of the scheme are not exceeded
- To notify all persons on the property and in the locality that a CCTV scheme is in operation
- To facilitate formal subject access requests of any images captured under the terms of the GDPR Act 1998

7.2 Our Operations Director will approve requests for the release of captured images following an incident of criminal activity, ASB or staff conduct, involving our owned and managed properties.

7.3 To ensure we comply with the Data Protection Act, all Subject Access Requests must be monitored from our Corporate Services Officer including:

- Police incidents
- Solicitors' requests to incidents
- Subject incidents
- Insurance company incidents
- Or any internal incidents, compromising health and safety

8.0 Review

We will review this Policy if there are changes to legislation, regulation, best practice and to suit our operational needs.