



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 to deter and detect crime and anti-social behaviour, and to improve community safety.
- We comply with Information Commissioners Officer (ICO) Code of Guidance
- We are both Data Controller, in that we make decisions on how the system is used and the information managed, and the Data Processor, in that we operate the system and manage the information collected through our CCTV systems.

3. REGULATORY AND LEGAL FRAMEWORK

- Data Protection Act 1998
- Human Rights Act
- Regulator of Social Housing - Regulatory Standards
- Protection of Freedom Act
- Information Commissioner Office – CCTV Code of Guidance
- Home Office - Surveillance Camera Code of Practice
- As a Housing Association we are not subject to Regulation of Investigatory Powers Act 2000

4. POLICY STATEMENT

Purpose of the system

- We will install systems with the primary purpose of reducing the threat of crime generally, protecting our property and homes, tenants and to improve public safety.
- To prevent crime and protect buildings and assets from damage, disruption, vandalism, and other crime.
- To support law enforcement bodies in the prevention, detection and prosecution of crime

This list is not exhaustive and other purposes may be or become relevant.

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.

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.
- 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 authorities:
 - Law enforcement agencies where images recorded may assist in a criminal enquiry and/or the prevention of terrorism and disorder
 - Prosecution agencies
 - Relevant legal representatives
 - Emergency services in connection with the investigation of an accident

Subject Access Requests

CCTV digital images, which show a recognisable person, are personal data and are covered by the Data Protection Act.

Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act. We will provide images in line with our Subject Access Request process.

Images can only be provided if it will not be prejudicial to criminal enquiries or proceedings. We will obscure third parties where appropriate.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Executive Assistant. The Executive Assistant will then arrange for a copy of the data to be made and given to the applicant within forty days of receiving the request.

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.

6. CONFIDENTIALITY

We will always treat any sensitive or personal information given to us as confidential in accordance with the Data Protection Act 1998 and the UK General Data Protection Regulations (UK GDPR). We will only pass this information onto third parties such as statutory organisations if:

- We are required by law to do so - either for the prevention or detection of crime or the apprehension or prosecution of offenders.
- There is an information/data sharing protocol, contract or confidentiality agreement in place.
- The person who gave us the information is happy for us to share the information.

Our employees will always respect confidentiality and will not share any information given in confidence unless justified by the assessed risk to the vulnerable person or required by law.

Confidentiality will be discussed with the customer where there are safeguarding concerns or alerts and an explanation will be given that this information may need to be shared with other people in order for the situation to be resolved.

7. EQUALITY AND DIVERSITY

As Bradford's only Black and Minority Ethnic (BAME) housing association, MHA is actively committed to promoting and embedding a culture of equality, diversity, and inclusion. MHA is an organisation which values differences and enables individuals to be their authentic selves.

Our aims are for the organisation to be a leading voice for BAME communities, to be truly representative of all sections of the society and communities we serve, and for each member of our staff, residents, and other stakeholders to feel respected and valued.

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 Assistant Chief Executive/Director of Operations 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
Date of Customer Panel Consultation	28.09.2021
Equality Impact Assessment Completed	Yes
Date Introduced and Approved by the Executives	November 2021
Interim Check	November 2022
Next Full Review	November 2025
Lead Officer	Head of Housing Services