



## Tuntum Housing Association CCTV Policy

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## **1. Introduction**

- 1.1 TUNTUM HA routinely captures images of people using Closed Circuit Television (CCTV) to provide a safe and secure environment for tenants, residents, colleagues and visitors, and also to protect TUNTUM HA's property.
- 1.2 This policy sets out the accepted use and management of CCTV surveillance equipment in line with the Information Commissioner's CCTV Code of Practice to ensure that TUNTUM HA complies with data protection legislation.

## **2. Scope**

- 2.1 This policy covers the installation and use of CCTV surveillance equipment and the gathering, storage, use and disposal of digital images. This policy applies to all staff employed by TUNTUM HA, the Police, external contractors and other partner agencies who may have access to the system from time to time.
- 2.2 This policy refers to the use of covert fixed static and pan tilt and zoom (PTZ) cameras, the deployment of remote cameras, body worn cameras and mobile surveillance

## **3. Legislative framework**

- 3.1 This policy statement incorporates a number of legislative and regulatory requirements, which will ensure that the CCTV cameras are operated in accordance with the key principles detailed in:
  - The Human Rights Act 1998
  - The UK General Data Protection Regulation and the Data Protection Act 2018
  - The Home Office's Surveillance Camera Code of Practice prepared in accordance with section 29 of the Protection of Freedoms Act 2012 (the Surveillance Code)
  - "In the picture": A data protection code of practice for surveillance cameras and personal information produced by the ICO (the ICO code)
  - The Regulation of Investigatory Powers Act 2000
  - The Protection of Freedoms Act 2012
- 3.2 Although not a relevant authority, TUNTUM HA have also embraced the Biometric and Surveillance Camera Commissioners (BSCC) Code of Practice and as part of this policy TUNTUM HA adopts the 12 guiding principles that are set out within the code.

## **4. Purpose**

- 4.1 The installation of CCTV at different locations across Tuntum Housing Association will assist to create a safe environment for the benefit of all those who live, visit, trade and work at these locations.
- 4.2 The CCTV system should not be used for any other purpose whatsoever. It is not the intention to use any of the measures to intrude on the privacy of areas

where persons have expectation of privacy or to monitor or record minor discretions.

4.3 TUNTUM HA operate and monitor our CCTV system 24 hours a day, 365 days of the year. The purpose and aims of the system are to:

- Increase safety for those who live, work, trade and visit TUNTUM HA locations
- Protect areas and premises used by the public and employees
- Deter and detect crime and anti-social behaviour
- Assist in the identification of offenders leading to their arrest and successful prosecution
- To help reduce the fear of crime and increase public reassurance
- Improve public safety
- Discourage aggressive or violent behaviour towards staff, tenants, residents and visitors
- To assist in the overall management of places to which the public have access
- To assist in developing the economic wellbeing of TUNTUM HA locations and encourage greater use of the facilities provided
- To provide assistance and direction to emergency services

4.4 In accordance with the guiding principles set out in the Biometric and Surveillance Camera Commissioners (BSCC) Code of Practice, this policy is underpinned by the following key principles:

- We know what the system is used for and review its use;
- There is clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used, and staff are aware of their responsibilities for CCTV;
- Clear rules, policies and procedures are in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them
- That we have a policy for keeping the CCTV images we hold, and we ensure they are deleted once they are no longer needed
- That we have a clear process for who can access the images, and a policy on disclosure;
- That the system we use follows recognised operational and technical standards.
- Systems will be appropriately specified and professionally installed, having due regard to appropriate technical and legal advice and other relevant guidance;
- Systems will only be installed where there is a clear identified and documented need
- Systems will only be installed with due consideration to all alternative options
- Appropriate technical and organisational measures will be employed to ensure the security of our systems and personal data, including relevant controls to govern access to and use of images.

- Appropriate measures will be taken to provide clear and accessible privacy information to individuals whose personal data is processed by systems;
- That we are clear on when CCTV images will be produced for criminal justice purposes
- This policy will be supplemented by procedures, which provide detailed operational guidance on the installation, operation, use and maintenance of our systems

## **5. Privacy Information**

- 5.1 TUNTUM HA respects and supports the individual's entitlement to go about their lawful business and this is a primary consideration in the operation of the systems. Although there is inevitably some loss of privacy when CCTV cameras are installed, cameras will not be used to monitor individuals in the ordinary course of lawful business.
- 5.2 Individuals will only be monitored if there is reasonable cause to suspect that an offence has been or may be about to be committed, or there is concern about an individual's immediate safety.
- 5.3 In order to ensure privacy the Tuntum HA will only use the cameras to view public areas and not to look into the interior of any private premises. Static Cameras will be positioned in such a way as not to view private areas
- 5.4 TUNTUM HA will be as transparent as possible in its usage of CCTV and surveillance systems and our Privacy Notices will reference the collection of personal data via CCTV and surveillance systems

## **6. Images and recordings**

- 6.1 We will ensure CCTV and BWV images and recordings are:
  - Kept securely for a maximum of 31 days. Where these are downloaded in connection with an incident they will be kept for as long as is necessary for the investigation to be carried out.
  - Destroyed once investigations and proceedings relating to those investigations are complete.
  - Only viewed if there is sufficient justification;
  - Restricted to TUNTUM HA colleagues with the appropriate authorisation and under appropriate supervision; unless the Police or other enforcement agency, have requested access for the purposes of detecting crime or in the case of civil claims an insurance company or its representatives.
  - 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
- 6.2 TUNTUM HA retains the copyright of all images in order to prevent use by third parties in a way that is contrary to this policy

## **7. Access**

7.1 The CCTV systems have access control and will remain secured at all times. Routine access to systems will be limited to:

- Team Leaders/ Service Managers
- Members of the TUNTUM HA Senior Management Team
- Authorised Police Officers
- CCTV Service Provider

7.2 Access for contractors will be necessary from time to time for the purpose of maintaining the equipment. This will be limited to that strictly necessary for the work to be carried out.

7.2 All visitors will sign a log detailing their name, company, organisation, and their arrival/departure times. This log will be subject to regular audit and assessed to ensure compliance with the Code and operating procedures.

## **8. Signage**

8.1 All areas where CCTV is in use will be clearly signed to comply with the UK GDPR & the Data Protection Act. This is to inform people that they are about to enter an area covered by CCTV cameras or to remind them that they are still in an area covered by CCTV. The signs will also act as an additional deterrent.

8.2 TUNTUM HA does not deploy covert cameras

## **9. Use of Body Worn Equipment**

9.1 Body Worn Video Equipment (BWV) is used for the purposes of reducing risk to colleagues and gathering evidence. TUNTUM HA uses BWV that has audio and visual recording capability.

9.2 Some examples of where BWV would be used:

- 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 TUNTUM HA property and business interests.
- Investigate alleged breaches of tenancy.

9.3 BWV is worn overtly, and where practicable the operative of the equipment will inform customers and anyone else present that they are being filmed.

9.4 Customers or any other persons have the right to request not too be filmed but it will always be at the discretion of TUNTUM HA when to use BWV equipment

## **10. Installation**

- 10.1 We will consult relevant customers and stakeholders before overt CCTV equipment is installed and complete a Privacy Impact Assessment. 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.
- 10.2 Customers requesting to install their own CCTV systems must seek permission from TUNTUM HA prior to the installation.

## **11. Training**

- 11.1 TUNTUM HA requires that all CCTV operators are trained to a proficient level. Training will include:
- Use of equipment
  - TUNTUM HA procedures and record keeping
  - Report procedures and action on incidents evidence handling
  - Actions in the event of an emergency
  - Legislation and crime prevention

## **12 Responsibility**

- 12.1 The Director of Resources and Risk shall be responsible for the implementation and review of this policy.
- 12.2 The Heads of Services will ensure that staff involved are trained in the implementation of this policy and any associated procedure documents.
- 12.3 The Head of Asset management & Compliance is responsible for day-to-day management of the CCTV system.

## **13. Consultation, Monitoring and Review**

- 13.1 The CCTV Policy will be reviewed every three years by the Audit & Risk Committee with tenant and stakeholder consultation.
- 13.2 An annual review will be carried to ensure the systems remain necessary, proportionate, and effective in meeting their stated purpose. The annual review will be published and will include:
- An evaluation of crime and ASB data during the 12-month period by location
  - The numbers and types of incidents dealt with and recorded by location
  - An assessment of the overall impact on ASB and crime
  - Customer feedback

## **14. Equality & Diversity**

### **14.1 TUNTUM HA are committed to:**

- Treating all customers and employees positively regardless of any personal characteristics including gender, age, ethnicity, disability, sexuality, gender reassignment or religion.
- Taking seriously all complaints and investigating and responding accordingly.
- Using plain language and providing information in other languages, large print, audio and braille on request

## **15. Associated Policies**

- Equality & Diversity Policy
- Domestic Abuse Policy
- Anti-Social Behaviours Policy
- UK GDPR/Data Protection Policy
- Tenancy Management Policy
- Safeguarding Policy
- Customer Feedback/Complaints Policy

## **16. Monitoring and Review**

This policy will be reviewed every three years, in accordance with broader guidance and legislation, and taking into account feedback from staff and service users.

Tuntum Housing Association's Board of Management will ultimately be responsible for ensuring that the policy is reviewed, although they may wish to delegate the review process.

Any changes to the policy will need the authorisation of the Tuntum Housing Association Board of Management. Until such authorisation is given the existing policy will continue to apply unless the existing policy contradicts any new legal requirements or responsibilities.