



CARE HOUSING ASSOCIATION CCTV POLICY

Implementation Date	06/05/2021
Created By	Rachael Kaminski (Operations Manager)
Last Committee Review Date	April 2024
Next Review Due	April 2027

1. Introduction

The monitoring, recording, holding and processing of images of distinguishable individuals constitutes personal data as defined by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA). The Information Commissioner's Office (ICO) regulates and enforces the GDPR and DPA.

This policy intends to ensure that, in its use of Closed-Circuit Television (CCTV), Care Housing Association (Care) is fully compliant with the requirements of the GDPR and DPA, the Protection of Freedoms Act (POFA) and the Surveillance Camera Code of Practice published by the Home Office 2013 and updated 2022. It should be read in conjunction with Care's Data Retention Policy. Ring doorbells (and similar) are not covered within this policy.

2. Purpose

Care will facilitate the operation of CCTV at specific schemes where it is deemed necessary to do so and where there is a clear justification for its operation.

GDPR requires the processing of personal data to be lawful, fair and transparent. As CCTV collects personal data in the form of images, it is in no way immune. In almost all cases, business owners can rely on legitimate interests or the need to comply with another legal requirement for the legality of operating CCTV. However, they will be required to justify this against the area of coverage. Data subjects' rights and freedoms cannot be overridden, especially in the case of legitimate interests. Even inside a work premises, employees have a right to privacy.

3. Implementation

Support provider partners must also comply with current legislation and guidance. All CCTV systems will be appraised before use (Appendix 1) and reviewed annually (Appendix 2) to ensure compliance with this policy and guiding principles from the Surveillance Camera Code of Practice (full version available [here](#)).

Where a support provider or tenant wishes to provide and manage their own CCTV, a suitable person/party will be required to take responsibility for the system and associated data and sign a document committing to this.

Any queries in relation to this policy, including access to information, should be made to enquiries@careha.org.uk

Care will adopt the code's 12 guiding principles:

- Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
- The user of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
- There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
- Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
- No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
- Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
- Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
- Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
- When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
- Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

4. Equality and Diversity

Care is committed to respecting diversity in all aspects of our work and we will not tolerate any form of discrimination or hate crime.

5. Responsibility, Commitment and Review

The designated officer responsible for implementation and monitoring of this policy will be the Chief Executive. Care will formally review this policy every three years or as necessary dependant on legislative changes.

APPENDIX 1

CCTV Appraisal (for new installations)

Address:	
Proposed CCTV System i.e. number of cameras, what areas they'll cover, manufacturer, etc.	
Does the system record or just stream live images? If recording, how long will data be retained for?*	
Is audio captured or just images? If audio, is this necessary or could this feature be disabled?	
Why is CCTV required? e.g. monitor ASB, for safety and security etc.	
Security measures – is the system password protected? Is this changed regularly?	
Who has authority to access images?	
Do authorised users have GDPR training and security system training?	
Does CCTV cover any area(s) outside the property boundary?	
Does the support provider agree to adhere to Care's CCTV policy? (Save email confirmation)	

*** Care insists data is not held for longer than 28 days unless expressly permitted**

Housing Officer _____

Authorised / Rejected by Care Housing Association Operations Manager *(delete as appropriate)*

Signed _____ Date _____

APPENDIX 2**CCTV Appraisal Review (for existing installations)**

Address:	
Detail any changes or repairs to the system in the last 12 months	
Does the system still only cover areas within the property boundary?	
Is the system still justified? Why?	
Security measures – are passwords secure and is access limited to certain individuals?	
Do authorised users have up to date GDPR training and security system training?	
How long will data be retained for? (Care insists data is not held for longer than 28 days unless expressly permitted)	
Are there any concerns or significant changes? If yes discuss with Care's Operations Manager before signing off this review.	

Housing Officer _____

Signed _____

Date _____