



CCTV Policy

CONTENTS

Page No.

1. Purpose	2
2. Principles	2
3. Review	2
4. Responsibilities	2
5. Scope	2
6. Policy Statement	3
6.1 Purpose of the system	3
6.2 Monitoring	3
6.3 Storage of Images	3
6.4 Access to images	4
6.5 Subject Access Requests	4
6.6 Training and Support for staff	4
6.7 Confidentiality	4
7. Consultation	6
8. Equality Impact Assessment	6

1. Purpose

This policy outlines North Devon Homes (and any of its subsidiary companies) use of CCTV and Automatic Number Plate Recognition (ANPR) across its properties and estates.

2. Principles

The following principles will apply to this policy:

- It will be open, fair, and transparent.
- It will comply with data protection legislation and best practice.

3. Review

We will review this policy at least once every three years to ensure that it continues to operate within best practice.

The policy and any associated procedures will be reviewed immediately following any relevant change to government policy, regulation, or legislation.

4. Responsibilities

We use CCTV in compliance with the Information Commissioners Office (ICO) Code of Guidance.

We act as a Data Controller in that we make decisions on how the system is used and managed across the organisation.

The Data Protection Officer has responsibility for the oversight of the use of CCTV, and all requests for CCTV installation will be assessed by the Data Protection Officer.

5. Scope

NDH will install and operate CCTV only where required for the purposes of the prevention, investigation, and detection of any anti-social behaviour; crime, and protection of its assets, customers and residents; the apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings); public and employee safety; and monitoring the security of premises. In the operation of CCTV at our sites for this purpose it is possible

that the image of data subjects will be recorded and as such the processing is included in our Privacy Notice and a DPIA has been carried out. Recordings and images will be retained in accordance with the Company's document retention policy.

6. Policy Statement

6.1 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.

6.2 CCTV Monitoring locations

- CCTV monitoring varies from site to site; however, it is usually in the communal areas of the building, and both the main and secondary exits.
- 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.
- One camera at the Westacott Road Head Office site contains ANPR technology (not linked to any external databases) and vehicles entering and exiting the car park are captured on this camera, enabling additional monitoring of vehicular access including a search capacity over a 30 day period.

- No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms or toilets).

6.3 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 on our inhouse file servers.
- The recorded material will not be kept for longer than the purpose for which it is retained and, in any case, no longer than 30 days in accordance with the document retention policy (unless agreed by the Data Protection Officer as an exception in the event it is required to fulfil a purpose as set out in the Scope of this policy, for example where the recorded material is required for criminal investigation). Exactly how long the 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.

6.4 Access to images

- Only nominated individuals will have access to images
- For Neighbourhoods CCTV:
 - Head of Customer & Housing Services
 - Community Services Manager
 - Neighbourhood Team Leader
 - Independent Living Services Team Leader
 - Specialist Support Team Leader
 - ILSOs
 - Neighbourhood Officers
 - Tenancy Support Coordinators
 - IT in the event of technical support being required
- For Head Office Westacott Road site
 - IT Manager
 - Facilities Officer (for Head Office)
 - Out Of Hours team members (for Head office)
- 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.

6.5 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 are being 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 to access the data must submit a request to the Data Protection Officer, as outlined in the subject access request procedure

6.6 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.

6.7 Confidentiality

We will always treat any sensitive or personal information given to us as confidential in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (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 or
- There is an information/data sharing protocol, contract, or confidentiality agreement in place or

- The person who gave us the information is happy for us to share the information.

Our employees must 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.

7. Consultation

The following have been consulted in developing the policy:

Date	Consultation methodology	Challenge / impact / result
09/01/24	ISCG Meeting	

8. Equality Impact Assessment (EIA)

Section 1: Contact details

Please complete your details and contact information in the spaces provided:

EIA Author:	Victoria Snellgrove
Job title:	Risk & Assurance Assistant
Department:	Strategy & Performance
Submission date:	20th June 2024

Section 2: About the policy

Please describe what you are impact assessing and who it applies to:

Title:	CCTV Policy		
Aims / description / purpose:	The use of and scope of CCTV across NDH and it's subsidiaries both at head office and at sites owned and managed by NDH.		
People it applies to:	<input type="checkbox"/> Staff - yes	<input type="checkbox"/> Customers - yes	<input type="checkbox"/> Contractors - yes

Section 3: Gathering data and evidence

Have you identified relevant evidence (qualitative and quantitative) to establish whether this policy could potentially affect some equality groups more than others?

Have you analysed equality data for each of the groups identified in Section 2?	<input type="checkbox"/> Yes	<input type="checkbox"/>
Have you identified / researched anecdotal or alternative evidence?	<input type="checkbox"/> Yes	<input type="checkbox"/>

Have you attached the evidence to this impact assessment?	<input type="checkbox"/>	<input type="checkbox"/> No
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Section 4: Assessing the impact

Based on your evidence, which equality groups might this policy affect more or less than others (if any)?

Age	<input type="checkbox"/>	Sexual orientation	<input type="checkbox"/>
Disability	<input type="checkbox"/>	Caring responsibilities	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Fuel and food poverty	<input type="checkbox"/>
Marriage and civil partnership	<input type="checkbox"/>	Young People who may be vulnerable	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Single parents	<input type="checkbox"/>
Race	<input type="checkbox"/>	Drug and alcohol dependency	<input type="checkbox"/>
Religion and belief (including no belief)	<input type="checkbox"/>	Homelessness	<input type="checkbox"/>
Gender / sex equality	<input type="checkbox"/>	Rural Isolation	<input type="checkbox"/>

Using examples from the evidence you have collected, please describe the impact (positive, negative or neutral) on the equality groups you have identified above and highlight any different needs required for this protected characteristic.

Note: if you are reviewing a policy/ guidance please reflect on the scope, language used and its application - does it fully promote equality and inclusion?

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Section 5: Addressing any impact: action planning

Please describe any actions or mitigation required as a result of this assessment – include the timescale for each and who is responsible:

Action / Mitigation	Timescale	Responsibility

Section 6: Involvement and Consultation

What involvement / consultation activity has been undertaken or is planned in relation to this policy?

Involvement / consultation activity	Results / Feedback
No consultation necessary beyond ISCG	N/A

Section 7: Approval and Publishing

Signature of EIA author:
Date:

Next review date:	Responsible Officer
Every three years Next review date: June 2027	Finance Director and Data Protection Officer
Author	Related Documents
Risk & Assurance Assistant	Data Protection Policy Document Retention Policy Information Security Policy CCTV Procedure CCTV DPIA CCTV Log Privacy Notice