

CCTV policy

1.0 Introduction

1.1 The Anti-Social Behaviour Crime and Policing Act 2014 requires the Group to have an Anti-Social Behaviour, Hate Crime and Harassment policy. The CCTV policy and procedure assists in prevention and enforcement action when dealing with anti-social behaviour, hate crimes or harassment.

2.0 Policy Statement

2.1 This policy does **NOT** apply to the following:

- Targeted and intrusive surveillance activities (such as those used by the police to investigate specific criminal activities);
- Surveillance techniques used by employers to monitor employees compliance with their contracts of employment;
- The use of cameras for broadcasting / media purposes.

2.2 We will use CCTV to:

- Prevent and detect criminal acts and anti-social behaviour around our homes and neighbourhoods;
- Assist with any taking into custody and prosecution of offenders;
- Ensure safe environments for our staff and customers;
- Protect our property and business interests;
- Investigate alleged breaches of tenancy.

2.3 Any individual found to be responsible for criminal acts may face enforcement action and/or prosecution.

2.4 Images captured by our CCTV may also be used in investigations into matters of internal staff discipline.

2.5 The Group's CCTV equipment does not record sound.

3.0 Policy Scope

3.1 The Group operates a number of Closed Circuit Television ("CCTV") systems at several locations to further the safety and security of its residents, staff and buildings. The purpose of this document is to set out the Group's procedure when using CCTV and the way that the CCTV equipment and recordings are managed.

3.2 This policy does **NOT** apply to the following:

- Targeted and intrusive surveillance activities (such as those used by the police to investigate specific criminal activities);

- Surveillance techniques used by employers to monitor employees compliance with their contracts of employment;
- Use of cameras for broadcasting / media purposes.

3.3 Where the above circumstances apply, directors' approval is required to ensure compliance with Regulation of Investigatory Powers Act 2001 ("RIPA") where necessary.

4.0 Roles and Responsibilities

4.1 This policy applies to all Group staff when requests are made for CCTV to be installed or for images to be viewed.

4.2 This policy will be monitored by the Head of Legal and reviewed every three years to ensure its suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation.

4.3 The Group's CCTV register is monitored and maintained by the Building Services Manager and is reviewed annually.

5.0 Legal Framework

5.1 Images captured by CCTV are classed as 'personal data' under data protection legislation if the individual is capable of being identified and we will act in accordance with current data protection legislation when operating CCTV systems. Individuals filmed using CCTV have the right to view the recordings – please refer to the Subject Access Request policy for details.

5.2 The Group will act in accordance with the Information Commissioner's Office ("ICO") '*Code of Practice for Surveillance Cameras and Personal Information*' and is registered with the ICO for the use of CCTV for 'crime prevention and detection and prosecution of offenders.'

The Wrekin Housing Group	Policy Control Sheet CCTV Policy Policy number 2021/009
Policy Author	Caroline Guy Head of Legal
Direct Lead	Jan Lycett Executive Director of Business Solutions
Version	1. April 2021
Target audience	All Wrekin Housing Group staff
Consultation	Tenants Panel Senior Managers
Date of Equality Impact Assessment	No individuals or groups of people are disadvantaged by the adoption of this policy.
Date of Data Privacy Impact Assessment	No Data Privacy Impact Assessment ("DPIA") is required as any new request for the installation of CCTV will be subject to the completion of a DPIA before approval.
Approving Body	Executive Management Group
Date of final approval	22 nd April 2021
Implementation date	30 th April 2021
Monitoring arrangements	The CCTV Register is reviewed annually.
Reporting	Executive Management Group
Review date	November 2023
Expiry date	30 th April 2024
Review cycle	Three year review cycle
Policy category	GDPR / Data Protection
Associated policies and procedures	CCTV procedure Confidentiality & Data Protection policy Data Loss and Information Security Breach Reporting policy Subject Access Request policy
Policy location	Intranet The Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Caroline Guy	Policy Review	1 - April 2021	EMG – 22 nd April 2021