

CCTV Policy

1.0 Introduction

- 1.1 The CCTV policy and procedure enables the Group to provide a safe and secure environment for staff and customers. It also assists in the prevention of crime and in taking enforcement action when dealing with anti-social behaviour, hate crimes or harassment.

2.0 Policy Statement

- 2.1 We will use CCTV to:

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

- 2.2 We will be sensitive to individuals personal circumstances and needs when implementing this policy.

- 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.

- 2.6 The Group may give permission for customers to install CCTV including ring doorbells or other wireless video devices under its Landlords Permission Policy / Procedure. Where these are installed, the customer will be the data controller and will be directed to the Information Commissioners Office for guidance.

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 how the Group will use 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, unless 2.3 applies;
 - 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.
- 3.4 This policy also does not include CCTV, Ring doorbells or other devices capturing videos installed by customers. Whilst the Group may give permission for the installation, the customer will be the Data Controller (if applicable) and will be referred to the Information Commissioners Office for guidance. Information for customers in relation to the installation of this equipment and the appropriate form to seek permission is available on the Group's website - [Improvements to your Home | The Wrekin Housing Group](#)

4.0 Roles and Responsibilities

- 4.1 All Group staff are responsible for reading and applying this policy when requests are made for CCTV to be installed or for images to be viewed.
- 4.2 This policy will be monitored by the Legal Services Manager 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 will be monitored and maintained by the Building Services Manager.
- 4.4 The GDPR Working Group will be responsible for completing an annual review of the register.

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 2024/014
Policy Author	Joanne Webb Legal Services Manager
Direct Lead	Jan Lycett Executive Director of Business Solutions
Version	2.0 June 2024
Target audience	All Wrekin Housing Group staff
Consultation	Wrekin Voices, Employee Forum, Senior Managers and Customer Committee
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 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	13 th June 2024
Implementation date	13 th June 2024
Monitoring arrangements	The CCTV Register is reviewed annually by the GDPR Working Group.
Reporting	Executive Management Group – Annually Audit & Assurance Committee – Annual Assessment of Internal Controls Report
Review date	December 2026
Expiry date	June 2027
Review cycle	Three year review cycle
Policy category	GDPR / Data Protection
Associated policies and procedures	CCTV Procedure Anti-Social Behaviour Policy Confidentiality & Data Protection Policy Information Security and Data Loss Policy Subject Access Request Policy
Policy location	Sharepoint The Wrekin Housing Group website

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Caroline Guy	Policy Review	1.0 - April 2021	EMG – 22 nd April 2021
Joanne Webb	Policy review - minor amendments to the introduction, scope and roles and responsibilities	2.0 – June 2024	EMG – 13 th June 2024