

CCTV procedure

1.0 Introduction

1.1 This procedure document should be read in conjunction with the CCTV Policy.

2.0 Scope

2.1 This procedure applies to all Group staff when requests are received for CCTV to be installed or when requests are received to view images which have been recorded.

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

3.0 Procedure statement

3.1 The Group operates a number of ("CCTV") systems at several locations and may use mobile or other devices to further the safety and security of its residents, staff and buildings or to detect or prevent anti-social behaviour or criminal activity in its communities. 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.

4.0 Types of CCTV

4.1 The Group's CCTV surveillance systems are static (fixed at a particular location) and include cameras, recorders and viewing screens. Cameras may be placed in areas such as entrances, stairwells, lifts, car parks and other public spaces. The Group keeps an up to date register of the locations where CCTV is installed and reviews this annually to ensure that it is only in place where it needs to be. A Data Privacy Impact Assessment ("DPIA") will be completed prior to the installation of any additional CCTV and kept with the register and annual review.

4.2 To assist with preventing Anti-Social Behaviour, or to gather evidence in specific cases, the Group has two Revadar cameras, used in collaboration with Telford & Wrekin Council ('the Council'). These are mobile cameras, which can be deployed across the Telford & Wrekin area, and are always used overtly with appropriate signage. The cameras are installed, operated and the data managed by the Council in accordance with the relevant Memorandum of Understanding and in line with the Council's CCTV code of practice and all applicable law. The Group remains Data Controller as the party who determines when and where the camera will be used and therefore the data that will be processed.

- 4.3 The Group also owns, and may on occasion provide to complainants in Anti-Social Behaviour cases, a Defender Apollo Touch CCTV system, including a SD card. This enables customers without an internet connection to use the system, as an alternative to having their own CCTV/ring doorbell, for the prevention or detection of crime and/or anti-social behaviour and will be limited in its use. If deployed, it will be done in accordance with this procedure and overtly with the appropriate signage.
- 4.4 The Group also owns 'time lapse' cameras which take single images over a set period of time and then puts all the images together to make a video. These are occasionally used to provide visual documentation of various projects and events. For example, to record the redevelopment of some sites and capture the demolition of existing properties and the construction of new ones. The time lapse camera images are captured on a memory card which is then downloaded to be used as a visual record, for example, for publicity or within the Annual Report produced for the Group Board. Access to the images is restricted to the Customer Voice and Value and Marketing and Communication Teams, and appropriate signage about the use of the time lapse cameras will be displayed where appropriate. Where these cameras are used, for example, to record the installation of a kitchen or a bathroom within a property, the consent of both the occupants and the employee/contractor will be obtained beforehand. Where necessary, a DPIA will be completed before they are used.
- 4.5 The Group employs an external company to undertake certain surveying works with the use of a drone. The company has signed a Confidentiality Agreement to ensure that any images it records are deleted after they have been provided to the Group. Emailed confirmation that the images have been deleted will also be requested.
- 4.6 The Group may use video recording equipment to aid with inspections to reduce the need for scaffolding and associated costs or sharing of survey information. Where this is to be used, customers will be informed and signage will be displayed where appropriate. No recording will take place until such time as the camera is correctly positioned to capture the intended images to minimise incidental capture of internal/neighbouring spaces. Any personal data captured will be removed/redacted and the property data stored for so long as it is needed.
- 4.7 Other references to "CCTV" within this document do not apply to the cameras operated by the local authority, time lapse cameras, drones or video footage used for property inspections.

5.0 Installation

- 5.1 CCTV equipment may be requested by any member of staff but the final decision about its installation will be made by the relevant Senior Manager following completion of a DPIA. Form CCTV1 must also be completed and the CCTV Register updated. Completed DPIAs and CCTV1s should be scanned and emailed to CCTVRegisterUpdate@wrekin.com

- 5.2 The Group will consult with residents before CCTV is installed and the results will be documented and kept for as long as the CCTV is in place.
- 5.3 The way that images are captured is a key factor in complying with data protection principles. It is vital that the location of CCTV surveillance equipment is carefully considered to ensure that:
- It provides acceptable coverage of the Group's owned and controlled sites, but minimises unnecessary intrusion into private/public areas;
 - Employees are aware of the purpose(s) for the CCTV surveillance cameras being installed and that they are only able to use the equipment to achieve this purpose;
 - It is secure and protected, as far as possible, from vandalism and interference;
 - It provides the right quality of images necessary to meet the required aims.
- 5.4 We will undertake a review of the CCTV Register annually to determine the need for the use of CCTV at the various locations, and where it is determined that it is no longer necessary, the CCTV will be removed.

6.0 Signage

- 6.1 Signage will be displayed at all locations where CCTV is installed. Signage will be clearly visible and will inform members of the public that they are entering a zone covered by CCTV surveillance equipment. All signs should contain the following information:
- The Group's company name and address;
 - The purpose of the surveillance;
 - Contact details.

The ICO's suggested wording is below:

"Images are being monitored and recorded for the purposes of crime prevention and public safety. The scheme is controlled by the Wrekin Housing Group Limited. For more information call 01952 217100."

- 6.2 In exceptional and limited circumstances, it may be determined that the use of signage is not necessary or appropriate. However, the Group must ensure that it has:
- Identified a specific criminal activity;
 - Identified the need to use surveillance to gather evidence of that criminal activity;
 - Assessed whether the use of signs would harm the success in obtaining such evidence;
 - Assessed how long the surveillance should take place to ensure that it is not carried out for longer than is necessary;
 - Documented all of the above by completing Form CCTV2 which must be signed by the relevant Senior Manager.

6.3 Where we are aware that a customer with a visual impairment is being allocated a property within a building or scheme in which CCTV is installed, we will advise the customer of the presence of cameras and confirm the information contained in the signage.

7.0 Images and Recordings

7.1 All images captured by the Group's CCTV systems are recorded digitally and are kept secure. Access to the systems is limited to authorised members of staff as detailed on form CCTV1 and to the Health & Safety and HR Teams where footage is necessary in relation to an investigation.

7.2 Recordings are automatically overridden and not retained indefinitely. The time loop varies depending on the system. However, recordings may be kept for longer if we have received a request to view or obtain a copy of them from a statutory enforcement agency or a customer who has made a Subject Access Request. They may also be kept for the appropriate limitation period where they assist with an internal health and safety or misconduct investigation, which could result in, or form part of, legal action. Where a Subject Access Request is received, the recording will be given to the individual in the form of a DVD or a video file by email, unless they have requested to view the recording.

7.3 A record must be kept of the date that recordings are removed, the reasons why they are removed, any crime incident number to which the recording may be relevant and the location of the recordings. Where the images are handed over to the police, or other third parties where appropriate, Forms CCTV3 & CCTV4 must be completed to record:

- Where they are being held;
- The name and occupation of the person they were given to;
- A signature from the person collecting the footage.

7.4 The viewing of images should be restricted to the relevant Senior Manager, members of staff named on Form CCTV1 and, where relevant and necessary in relation to an internal investigation, the Health and Safety and HR Teams. Any viewing of recorded images must take place in a restricted area and the relevant details completed on Form CCTV4 where viewing involves a third party.

7.5 Images should only be provided to third parties in limited circumstances and this must be documented. Any refusal to allow images to be viewed or disclosed must also be documented on Form CCTV4. For example, where images have been captured for the prevention and detection of crime, disclosure should only be considered in the following circumstances:

- Law enforcement agencies where images would assist in a specific criminal activity;
- Prosecution agencies;

- Legal representatives;
- The media, if it is decided that the public's help is needed to identify a victim, witness or perpetrator. However, the wishes of the victim should be considered.

7.6 If images are provided to a third party, the following information must be documented:

- The date and time access was allowed;
- Who the third party is;
- The reason why access was allowed;
- The date and time range of recorded images and details of which cameras / areas they are from.

8.0 Use of CCTV/Ring Doorbells (or similar devices) by customers

8.1 Any tenant or leaseholder wanting to install CCTV at their property must obtain permission from the Group and are referred to the Information Commissioners Office (ICO) guidance.

8.2 Upon completion of the appropriate form, the Group will consider each application on an individual basis. Relevant information and the form are available on the Group's website - [Improvements to your Home | The Wrekin Housing Group](#).

8.3 Permission given is subject to compliance with ICO guidance and whilst the Group will try to assist where possible, any disputes relating to the capturing of data should be directed to the ICO (in these circumstances it is the tenant who is the Data Controller unless the installation is covered by the domestic use exemption – again guidance as to whether this applies should be sought from the ICO).

FORM CCTV1
Approval and Usage of CCTV Record

Case: _____ Date of installation: _____ to _____

Installation at: _____

Authorising Officer: Approved: _____ Date: _____

STATIC	Yes		No	

Residents Consulted

Yes		No	
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 Date of Consultation: _____

Authorising Officer Signature: _____ Date: _____

Signage in Place:

Yes		No	
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 Date of Sign Installation: _____

MOBILE	Yes		No	

Approval not to Consult Residents

Yes		No	
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Authorising Officer Signature: _____ Date: _____

Completed CCTV2 (Approval not to use Signage)

Yes		No	
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Siting of Camera

Where: _____

Approved by: _____ Date: _____

Approved People to use / view CCTV equipment/recordings:

Name: _____ Approved By: _____

Name: _____ Approved By: _____

FORM CCTV2

Approval NOT to use Approved Signage

Case: _____ Date of installation: _____ to _____

Installation at: _____

Siting of Camera:

Reason for not using Signage:

Approved by: Name _____

Signature _____

Date: _____

FORM CCTV3

Disclosure of Closed Circuit Television Surveillance Images to Third Parties

Case: _____

Image copied by: _____ Signed: _____

Image edited by: _____ Signed: _____

Image viewed by:

Name: _____

Address: _____

_____ Tel: _____

Signed: _____ Date: _____

Exemption applied. Please tick:

- For the prevention and detection of crime or the apprehension and prosecution of offenders.
- Subject access request received.
- To assist in on-going disciplinary matter or H&S investigation.

FORM CCTV4

Closed Circuit Television Surveillance Images Released to Third Parties

Release Approved

Yes		No	
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Copied images released to Third Party

Yes		No	
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Type	Original Copy		Edited Copy	
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Data Protection Transfer Request Received

Yes		No	
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Images released to:

Name Of Third Party:

Occupation: _____ Badge Number (Police only) _____

Details of where images are to be held? _____

Signature of Third Party collecting images: _____

Signature of WHG staff providing image: _____

Date: _____

Exemption applied:

For the prevention and detection of crime or the apprehension and prosecution of offenders

Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date
Caroline Guy	Procedure reviewed in line with review date	1.0 - April 2021	EMG – 22 nd April 2021
Joanne Webb	Additional information relating to types of CCTV/video equipment in use and expansion of section relating to customers use of CCTV	2.0 - April 2024	EMG – XX/XX/2024