



# CCTV POLICY

October 2021

All the Co-operative's Policies and Procedures are available in large print, braille, audio or other languages on request.

Please ask a member of staff if you would like a version in a different format.

<b>POLICY IMPLEMENTATION CHECKLIST</b>	
Policy Guardian:	PAUL MURPHY
Author:	CATHY BRIEN
Approved by Director:	20 OCTOBER 2021
Effective From:	20 OCTOBER 2021
Date of Next Review:	20 OCTOBER 2024
Diversity compliant:	YES
Equality Impact Assessment:	LOW
Data Protection compliant:	YES
Health & Safety compliant:	YES
Procedure implemented:	YES
SDM system changes made:	N/A
Training Completed:	
Posted on Sharepoint:	
Posted on website:	

**COVID-19 Generic Policy Statement:**

Although we will always endeavour to abide by our policies and procedures we may be unable to do so due to the COVID-19 global pandemic. The organisation will follow all Government guidance implemented to mitigate transmission of the COVID-19 virus. This could effect over service delivery and protocols contained within this policy.



# Forgewood Housing Co-operative

## CCTV Policy

### 1. Policy Statement.

- 1.1 Forgewood Housing Co-operative uses Close Circuit television (“CCTV”) within the premises of the community centre. The purpose of this policy is to set out the position of Forgewood Housing Co-operative as to the management, operation and use of the CCTV at the community centre.
- 1.2 This policy applies to all member of staff, visitors, contractors and customers to the centre and all other persons whose images may be captured by the CCTV system.
- 1.3 This policy takes account of all applicable legislation and guidance; including:
  - 1.3.1 General Data Protection Regulation (“GDPR”);
  - 1.3.2 Data Protection Act 2018 (together the Data Protection Legislation);
  - 1.3.3. CCTV Code of Practice produced by the Information Commissioner;
  - 1.3.4 Human Rights Act 1998.
- 1.4 This policy sets out the position of Forgewood Housing Co-operative in relation to its use of CCTV.

### 2. Purpose of CCTV.

- 2.1 Forgewood Housing Co-operative uses CCTV for the following purposes:
  - 2.1.1 To provide a safe and secure environment for community centre users
  - 2.1.2 To prevent the loss of or damage to the community centre buildings and/or assets;
  - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

### 3. Description of system.

- 3.1 The community centre has a number of cameras in and outside of the building. There are a range of movable and fixed cameras.

### 4. Siting of Cameras.

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent position where they are clearly visible to staff, visitors, customers and contractors;
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Forgewood Housing Co-operative will make all reasonable efforts to ensure that areas outside of the community centre premises and grounds are not recorded;
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation;
- 4.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy;
- 4.5 Access to the footage is restricted and will only be used to fulfil the purposes in 2.1.

## **5. Privacy Impact Assessment.**

- 5.1 Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Forgewood Housing Co-operative to ensure that the proposed installation is compliant with legislation and ICO guidance;
- 5.2 Forgewood Housing Co-operative will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

## **6. Management and Access.**

- 6.1 The CCTV system will be led by a member of the Senior Management Team (SMT);
- 6.2 Any allegations against staff will be referred immediately to the Director and only they will determine who needs to view the footage.
- 6.3 The viewing of live CCTV images will be restricted to the Senior Management Team who will ensure that in doing so, the purposes in 2.1 are satisfied. The SMT may delegate the viewing of live images to other staff deemed responsible and suitable. These will be noted in part 5 of the CCTV privacy impact assessment template.
- 6.4 Recorded images which are stored by the CCTV system will be restricted to access by members of the Senior Management Team as in 6.3.
- 6.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.6 The CCTV system will be checked daily to ensure that it is operating effectively.

## **7. Storage and Retention of Images.**

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 7.2 Recorded images are stored only for a period of 20 days unless there is a specific purpose for which they are retained for a longer period.
- 7.3 Forgewood Housing Co-operative will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- 7.3.1 CCTV recording systems being located in restricted access areas;

- 7.3.2 The CCTV system being encrypted/password protected and access only permitted to the Senior Management Team and the day to day operator;
- 7.3.3 Restriction of the ability to make copies the Senior management Team and the contracted technician;
- 7.3.4 Restriction of repositioning CCTV cameras to Senior Management Team and contracted technician only.

## **8. Disclosure of Images to Data Subjects.**

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation.
- 8.3 When such a request is made a member of the Senior Management Team will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The Senior Management Team must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then Forgewood Housing Co-operative must consider whether:
  - 8.5.1 The request requires the disclosure of the images of individual other than the requester, for example whether the images can be distorted so as not to identify other individuals;
  - 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
  - 8.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosure which sets out:
  - 8.6.1 When the request was made;
  - 8.6.2 The process followed by the Senior Management Team and/or contracted technician in determining whether the images contained third parties;
  - 8.6.3 The considerations as to whether to allow access to those images;
  - 8.6.4 The individuals that were permitted to view the images and when; and
  - 8.6.5 Whether a copy of the images was provided, and if so to whom, when, and in what format.

## **9. Disclosure of Images to Third Parties.**

- 9.1 Forgewood Housing Co-operative will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with current Data Protection Legislation.

- 9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the Senior Management Team must follow the same process as above in relation to subject access request. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 9.4 The information above must be recorded in relation to any disclosure.
- 9.5 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

## **10. Review of Policy and CCTV System**

This policy will be reviewed in 1 year and 3 yearly thereafter should the need arise.

## **11. Misuse of CCTV systems**

- 11.1 The misuse of CCTV system could constitute a criminal offence.
- 11.2 Any member of staff who breaches this policy may be subject to disciplinary action.

## **12. Complaints relating to this policy.**

- 12.1 Any complaints relating to this policy or to the CCTV system operated by Forgewood Housing Co-operative should be made in accordance with the Complaints Policy.

## CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

**1. Who will be captured on CCTV?**

Visitors, staff, contractors and customers.

**2. What personal data will be processed?**

Facial images and behaviour.

**3. What are the purposes for operating the CCTV system? Set out the problem that Forgewood Housing Co-op seeks to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.**

Prevention or detection of crime. To assist in health and safety emergencies.

**4. What is the lawful basis for operating the CCTV system?**

Legal obligation, legitimate interest of the organisation to maintain health and safety and to prevent and investigate crime.

**5. Who is/are the name persons responsible for the operation of the system?**

Cathy Brien and Paul Lennon.

**6. Describe the CCTV system, including:**

- a. How this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;

The system chosen provides high quality images which can be used to detect and identify individuals in need of assistance or committing crimes.

- b. Siting of cameras and why such locations were chosen;

The cameras monitor the car park, the front entrance to the building, the rear entrance to the building and the corridor door. These locations were

chosen as the highest risk areas for the building. The cameras are positioned in the highest footfall areas to help protect staff and visitors to the building. Furthermore the CCTV system helps provide reassurance to funders and insurance providers. The presence of the cameras reduces the Co-op's annual insurance premium for the building.



- c. How cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;

Yes, externally the cameras are pointed at the car park and the building itself. Internally the cameras only capture footage from inside the building.

- d. Where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and

The signs advising that a CCTV system is in operation are clearly displayed as visitors enter the building. As part of any new member of staff's induction process they are advised of the CCTV system and its purpose.

- e. Whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

Our contracted technician on behalf of our CCTV provider would be able to assist with any required redaction.

7. Set out the details of any sharing with third parties, including processors.

Forgewood Housing Co-operative will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with current Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then the Senior Management Team must follow the same process as above in relation to subject access request.

Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern.

This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

8. Set out the retention period of any recordings, including why those period have been chosen.

Recorded images are stored only for a period of 20 days unless there is a specific purpose for which they are retained for a longer period.

9. Set out the security measures in place to ensure that recordings are captured and stored securely.

The system is password protected.

10. What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

Employees unaware that they are being filmed in their place of work. Visitors to the centre unaware that they are being filmed.

11. What measure are in place to address the risks identified?

All employees are informed that they are being recorded. Signage to advise visitors to the building, that cameras are in place.

**Approval:**

This assessment was approved by the Data Protection Officer:

DPO: Paul Murphy\_\_\_\_\_

Date: 19/10/2021\_\_\_\_\_