



# CCTV Policy

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Version 1

**Approved by:** May 2018  
**Approved date:** Executive Team

## 1.0 Introduction

1.1 This Policy outlines our approach to the use of overt (cameras can be seen) and covert (cameras are hidden) closed circuit television (CCTV). It covers CCTV installed:

- By residents
- In new developments (secure by design)
- In existing developments (linked to anti-social behaviour or crime)
- In our offices
- By a third party (commercial and agency managed).

1.2 Our intention is to balance the privacy rights of individuals, with our responsibilities to prevent and detect anti-social behaviour or crime. We will ensure the use of CCTV is proportionate to the impact of anti-social behaviour or crime on individuals or communities.

1.3 Where we use 'you' and 'your' in this Policy we mean our residents. The terms 'we', 'our', and 'us' mean Optivo.

## 2.0 What we'll do when we use overt CCTV

2.1 We will use overt (unhidden) CCTV to:

- Prevent or detect crime
- Identify and prosecute offenders
- Prevent and tackle anti-social behaviour
- Protect our staff
- Protect our homes, offices and assets
- Improve personal safety and reduce the fear of crime.

2.2 Before installing a CCTV system, we'll consider other options, for example improving lighting or upgrading security.

2.3 To ensure we comply with Data Protection and GDPR requirements, we'll:

- Conduct a GDPR privacy impact assessment for each CCTV system
- Conduct a six monthly visual check of the CCTV system
- Conduct a three yearly enhanced check of the CCTV system
- Ensure the quality of the cameras is sufficient to identify persons
- Ensure the system is time and date stamped accurately
- Display visible CCTV signs confirming we're recording and who to contact for enquires
- Remove cameras when they are no longer required for their original purpose. Before removing fixed cameras, we'll consult local residents.

2.4 If we think it's appropriate to install overt CCTV on estates or in your communal areas, we'll write to local residents to confirm:

- The purpose of the CCTV
- We've got the appropriate authorisation to install CCTV
- We've the appropriate controls in place to keep the CCTV data secure
- Whether it's a temporary or permanent installation
- Whether there's a cost recoverable from their service charges for the CCTV. We'll consult residents, where required under section 20 of the Landlord and Tenant Act 1985.
- We've conducted a privacy impact assessment
- Who to contact if the cameras are damaged.
- How they can access their data.

2.5 You have a legal right to view your images if we have recorded them overtly. You should submit a 'Subject Access Request' (see our [Data Protection Policy](#) for more details).

2.6 We will only record sound via CCTV cameras when tackling anti-social behaviour and crime, not for general observation. We will use audio recording equipment where we have:

- Audio based alert systems
- Two-way audio feeds from 'help points' covered by CCTV cameras
- Where we trigger recording due to a specific threat, e.g. a 'panic button' in an office.

We will put up signs must make it very clear audio recording is in use (except when being used with hidden cameras).

2.7 We will erase images and audio recordings after 31 days unless the information relates to an ongoing anti-social behaviour case. . Where this is the case, we'll erase the images and audio recordings, within three months of closing the ASB case or any legal proceedings concluding. We'll keep a record when we:

- Review images
- Download images
- Disclose data legally to a third party
- Move the data to another location
- Process a Subject Access Request.

2.8 Only staff authorised and trained to operate CCTV equipment can review, download and share data. We hold a central list for all our cameras and staff authorised to operate our CCTV equipment.

2.9 Where CCTV systems are managed by third parties managing agents we have appointed, they'll adopt our CCTV Policy.

### **3.0 When we use Covert or 'Hidden' CCTV**

3.1 We'll only use hidden CCTV when other methods of gathering evidence of crimes, such as tenancy fraud or anti-social behaviour, have failed.

3.2 The same rules in sections 2.3 and 2.4 apply above except:

- No signs will be displayed
- There will be no obligation to tell the alleged perpetrator or any other individual that the covert CCTV is in use
- Use of covert CCTV will be time limited as part of the authorisation in section 3.3.

3.3 Authorisation for the use of covert CCTV cameras will be managed by the Governance Team and approved by:

- The Director of Housing Services where covert CCTV is used in relation to ASB
- The Executive Director People & Communications where the covert CCTV is used in our offices.

3.4 We will only record sound via covert CCTV cameras, where justified and authorised.

#### **4.0 When can residents install and operate CCTV?**

4.1 You must get our permission before you install CCTV. Before requesting permission, you should consider other solutions, for example security lighting or neighbourhood watch schemes.

4.2 We'll give permission, if you agree to:

- Cover just your property and not your neighbours
- Not use your CCTV in communal areas
- Make good, if you cause any damage
- Get our agreement on where to put the cameras
- Comply with the law. For more information, you can go to the [Surveillance Camera Commissioner's website](#).

4.3 Before we grant permission, we'll ask you to sign a CCTV Agreement. If we don't give permission, we'll contact you to explain why.

4.4 Where we discover CCTV is being used without our knowledge, we may give permission retrospectively if you meet the conditions in section 4.2 and sign a CCTV Agreement.

4.5 If you feel we've refused a request unfairly, you can appeal by following our [Complaints Resolution Policy](#).

4.6 Failure to meet these expectations may be a breach of your occupancy agreement. We will withdraw permission if you don't meet these conditions. We will ask you to remove the CCTV equipment, if you don't remove it, we will take action to remove it.

#### **5.0 Review**

5.1 We will review this Policy to address legislative, regulatory, best practice or operational issues.