



**Policy** CCTV Policy

**Approved by Committee:** 30 May 2019

**Review Date** May 2022

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## **1.0 Introduction**

- 1.1 Cadder Housing Association uses closed circuit television (CCTV) images for the prevention, detection and investigation of criminal activity, as well as monitor the Association's premises in order to provide a safe and secure environment for customers and staff and visitors, and to prevent the loss or damage to the Association's property.
- 1.2 The system comprises of a number of dome cameras, which also have sound recording capability.
- 1.3 The CCTV system is owned and operated by Cadder Housing Association and the deployment of which is determined by the Association's Director and Management Team.
- 1.4 The CCTV is recorded on the DVR drives associated with the cameras and can be accessed by the Director and other relevant staff.
- 1.5 The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Association's staff.
- 1.6 The Association's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 2018 as well as GDPR. This policy outlines the Association's use of CCTV and how it complies with the Act.
- 1.7 All authorised employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound. Maintenance of the cameras in the Community Centre is carried out by Fair Secure and the cameras are maintained by our IT providers.

## **2. Policy Aims and Objectives**

- 2.1 Provide clear and unambiguous information on the use of CCTV recording equipment used by Cadder Housing Association
- 2.2 Provide a framework of instructions for the use, retention and analysis of CCTV recordings
- 2.3 Meet the requirements of the Data Protection Act and General Data Protection Regulations (GDPR) as outlined in EU Data Protection Reforms.
- 2.4 Promote a safer working environment for staff, customers , visitors and any other persons who may access areas of the Association's premises (owned or leased) with CCTV recording system used by Cadder Housing Association.

## **3. Statement of Intent**

- 3.1 The Association complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

[http://www.ico.gov.uk/~media/documents/library/Data\\_Protection/Detailed\\_specialist\\_guides/ICO\\_CCTVFINAL\\_2301.ashx](http://www.ico.gov.uk/~media/documents/library/Data_Protection/Detailed_specialist_guides/ICO_CCTVFINAL_2301.ashx)

- 3.2 The Association will ensure key people in the organisation i.e. post holders noted in section 8.1 of this policy are made aware of this policy including data protection requirements.
- 3.3 CCTV warning signs will be clearly and prominently placed at all external entrances to the Association i.e. the main reception area and interview booths. Signs will contain details of the purpose for using CCTV (see appendix B). In other areas where CCTV is used i.e. Cadder Community Centre and Balmore Industrial Unit at 74 Strathmore Road, the Association will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- 3.4 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

#### **4. Siting of Cameras**

- 4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The Association will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act and GDPR.
- 4.2 The Association will make every effort to position cameras so that their coverage is restricted to the Association's premises, which may include the external fabric of the building and associated areas i.e. car parking and entrance paths.
- 4.3 Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

#### **5. Quality Control / Replacement**

- 5.1 The Association will review the quality of the images and sound annually to ensure they meet the needs of Police Scotland in any criminal proceedings. This will be undertaken by the Association's IT service support provider, in close consultation with the Director and Police Scotland. This check will also ensure that the date and time are accurate.
- 5.2 The Association's IT service support provider will maintain the equipment and ensure recordings are backed up each day and the server is overwritten on a monthly basis. Images are stored for 28 days on each of the DVRs.

#### **6. Covert Monitoring**

- 6.1 The Association may in exceptional circumstances set up covert monitoring. For example:
  - i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
  - ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- 6.2 In these circumstances authorisation must be obtained from the Director.

- 6.3 Covert monitoring must cease following completion of an investigation.
- 6.4 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilets or private offices.
- 6.5 The Association will have regard to ICO's code of practice for employers to follow when monitoring staff. The code can be viewed at:  
<http://ico.gov.uk/fororganisations/topicspecificguides/employment.aspx>

## 7. Storage and Retention of CCTV images

- 7.1 Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. Please refer to the Associations Data Protection Policy and Privacy Notices for more information.
- 7.2 All retained data will be stored securely in a password protected folder in the 'personnel' drive of the Association's I.T server, which will prevent any accidental loss or unauthorised access to images.
- 7.3 The Association may transfer images to a DVD or CD and pass these to Police Scotland, Association's Solicitors, Community Safety Glasgow or Management of the Association to assist with any formal action i.e. civil or criminal action or internal disciplinary proceedings.
- 7.4 The Association will destroy images at the earliest opportunity following conclusion of any criminal or disciplinary investigation. In close consultation with our Service Support Provider we will ensure that the destruction of images renders them irretrievable.

## 8. Access to CCTV images

- 8.1 Access to recorded images will be restricted to the Director and Management Team or delegated individuals who are authorised to view them as listed, and will not be made more widely available.

Camera Location	Authorised Staff
Association's Offices (Fara Street)	Director Finance & Corporate Services Manager Customer Services Manager Maintenance Manager
Cadder Community Centre (Tresta Road)	Director Finance & Corporate Services Manager Customer Services Manager Manager Regeneration Manager
Balmore Industrial Unit (Strathmore Road)	Director Finance & Corporate Services Manager Customer Services Manager Maintenance Manager

- 8.2 Images for the office and Balmore Unit should only be viewed in the offices of the Director or Management Team, thus avoiding a situation where it can be accidentally viewed by others. The Community Centre can only be viewed on the screen in the centre.

## **9. Subject Access Requests (SAR)**

- 9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 9.2 All requests should be made in line with the Association's Data Protection and Privacy Policies. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

## **10. Access to and Disclosure of Images to Third Parties**

- 10.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Association where these would reasonably need access to the data (e.g. Community Safety Glasgow).
- 10.2 Requests to access images or have them erased should be made in writing to the Director.
- 10.3 The data may be used within the Association's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **11. Complaints**

- 11.1 Complaints and enquiries about the operation of CCTV within the Association's offices or other premises owned or leased by the Association should be directed to the Director in the first instance.

## **12. Breach of Data Protection**

- 12.1 In the event of a breach of data protection guidelines or the General Data Protection Regulations in the implementation of the CCTV Policy, the Association will inform the Information Commissioners Office, as well as individuals affected in line with Data Protection Policies and legal obligations.
- 12.2 The Director will be supported by the Corporate Services Officer in overseeing compliance with the CCTV Policy and specifically to meet data protection regulations and guidelines.

## **13. Further Information**

- 13.1 Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- [www.ico.gov.uk](http://www.ico.gov.uk)
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018
- GDPR 2018
- Privacy Notice

## **14. Review**

14.1 This Policy is scheduled for review in May 2022.



## Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Director who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

Cadder Housing Association has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers and staff. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
Staff will be consulted about the proposal to install CCTV equipment.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.			
Except for law enforcement bodies, Association's solicitors or the Glasgow Community Safety Services who support the Association in the management of anti-social behaviour, images will not be provided to third parties.			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the Director knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			

## **Appendix B – CCTV Signage**

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Association is to ensure that this requirement is fulfilled.

**The CCTV sign should include the following:**

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The Association's name, Cadder Housing Association Limited
- The Association's address and contact telephone number for enquiries,

20 Fara Street  
Cadder  
Glasgow  
G23 5AE

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