



On Site CCTV and Security Policy

Department: Technology

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1. INTRODUCTION

1.1. Hill Homes operates closed circuit television (CCTV) systems to:

- promote the safety and security of users of its buildings; and,
- protect the asset value of those buildings it owns and controls.

1.2. This policy sets out:

- the ownership of the systems that are in operation;
- the line management responsibility for the systems in operation;
- the type of systems in use;
- the purposes for which CCTV will be used and the restrictions on its use;
- how requests to view data will be handled; and,
- how Hill Homes will report and review the use of its systems.

1.3. Hill Homes operates CCTV systems at its:

- Extra-Care Scheme at Trees, 2-4 Broadlands Road. The system covers external areas and some internal communal areas; and,
- Sheltered Housing Unit at Nuffield Lodge, 22 Shepherds Hill. The system covers external areas.

1.4. The location and design of CCTV cameras is designed to ensure:

- they provide maximum coverage of Hill Homes sites, whilst minimising intrusion into private spaces;
- they are secure and protected from vandalism;
- they provide low maintenance and high operability at all times and are free from natural or man-made obstructions from the area they are intended to cover; and,
- they provide the right quality of images to meet the required aims.

2. DEFINITIONS

2.1. Hill Homes refers to the group of companies comprised of Hill Homes Housing Association, Hill Homes Care Ltd and Hill Homes Care Services Ltd.

2.2. For the purposes of this policy, “client” refers to both:

- clients of Hill Homes Care Ltd and Hill Homes Care Services Ltd; and,
- tenants of Hill Homes.

3. AIMS AND OBJECTIVES

3.1. The objective of this policy is to ensure Hill Homes complies with the Regulatory Framework for Social Housing, including the Neighbourhood and Community Standard that specifies:

- registered providers shall keep the neighbourhood and communal areas associated with the homes that they own clean and safe. They shall work in partnership with their tenants and other providers and public bodies where it is effective to do so;

- registered providers shall co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties; and,
- registered providers shall work in partnership with other agencies to prevent and tackle anti-social behaviour in the neighbourhoods where they own homes.

3.2. This policy sets out:

- how CCTV systems are used at Hill Homes;
- who is responsible for the operation of these CCTV systems; and,
- how access requests will be dealt with.

4. **POLICY STATEMENT**

4.1. Hill Homes operates CCTV in order to:

- promote the health, safety and security of tenants, staff and other users of its buildings, communal spaces and open spaces;
- assist the controlled access to restricted areas in its properties in conjunction with door entry system technologies;
- maintain the asset value of properties and equipment owned by Hill Homes by deterring/preventing vandalism or theft;
- promote early intervention actions that would save further damage to persons or properties; and,
- assist in the prevention of crime, anti-social behaviour, public order offences and other statutory enforcement issues and in any subsequent apprehension and prosecution of those found to be responsible for those actions.

4.2. Images captured by Hill Homes' CCTV systems may be used, as appropriate, in investigations into matters of internal staff discipline.

4.3. Hill Homes will not use its CCTV system for the purposes of:

- recording sound; and,
- providing live streaming for use on the internet or commercial purposes.

4.4. All cameras used by Hill Homes will be 'overt' and clearly visible at all times, Where Hill Homes operates CCTV cameras, appropriate signage will be displayed.

4.5. Visual access to the monitors capturing images will be obscured from public view. Authorised parties will ensure privacy is maintained when viewing images.

4.6. Hill Homes will retain images on the hard drive of the CCTV system for the permitted time period, after which they will be automatically wiped from the hard drive of the CCTV system. No system back-ups are made. The retention time for images is:

- Trees – 7 days; and,
- Nuffield Lodge – 10 days.

4.7. Hill Homes will share CCTV images with statutory enforcement bodies (police and local authority) when this may assist the statutory bodies in the conduct of their duties.

- 4.8. If a member of a statutory body needs to remove a copy of the recorded material in hard format, they will be required to sign a release form detailing:
- the date and time the recorded material was taken;
 - the date and time range of recorded images and details of which cameras/areas the images are from;
 - the badge number and name of person taking the information; and,
 - a brief description of why the information is required and for what purposes it will be used.
- 4.9. Anyone that believes they may have been filmed on Hill Homes CCTV systems has a right to request a copy of this data or the images captured. Hill Homes will provide a copy of such data on receipt of a legitimately completed 'Hill Homes CCTV Data Request Form'. The person making the request must identify:
- what they want the information for;
 - details of where and when they think their image may have been captured (to within a one-hour timeframe); and,
 - photographic proof of identity.
- 4.10. The Senior Housing Officer has the discretion to agree or refuse any request for the release of information unless there is an overriding legal obligation such as a court order in place.
- 4.11. Hill Homes will process requests for CCTV data information within five working days. Any images that are released to a data subject may have the identities of any unassociated third parties obscured to prevent their anonymity and prevent an intrusion into their privacy.
- 4.12. The Senior Housing Officer is responsible for responding to any requests for the release of CCTV images that may be received under the Freedom of Information Act 1998. In most cases, if the images being requested contain images of identifiable individuals, and they are not the people making the request, the request will be refused on the grounds it may potentially result in a breach of the Data Protection Act requirements.
- 4.13. Any complaints relating to the operation of Hill Homes' CCTV systems will be dealt with in line with Hill Homes' Complaints and Compliments Policy.

5. LEGISLATION, REGULATION AND GUIDANCE

- 5.1. The Regulator of Social Housing's Neighbourhood and Community Standard
- 5.2. In operating CCTV systems, Hill Homes will comply with guidance and good practice produced by the Information Commissioners Office and the British Standards Institute.
- 5.3. The European General Data Protection Regulation ("GDPR"), which came into effect on 25th May 2018. The GDPR is supplemented by the Data Protection Act 2018
- 5.4. The Freedom of Information Act 1998

5.5. The Human Rights Act 1998

5.6. The Protection of Freedoms Act 2012

6. **CONFIDENTIALITY**

6.1. Access to the CCTV system is limited to authorised staff and appropriate security measures are in place to prevent external interception. Staff authorised to access the CCTV system are:

- CEO;
- Senior Housing Officer;
- Housing Support Officer; and,
- Caretaker.

6.2. Hill Homes has an arrangement in place with a third party to carry out servicing, inspections and maintenance of its CCTV systems.

6.3. Any images that Hill Homes' CCTV cameras capture of a recognisable person are classed as personal data and are covered by the provisions of the GDPR and the Data Protection Act 2018.

7. **MONITORING AND REPORTING**

7.1. The Senior Housing Officer is responsible for conducting a regular audit to ensure that CCTV signage is in situ and clearly visible.

7.2. The Senior Housing Officer is responsible for responding to CCTV data requests. A log of all requests will be maintained, recording whether the request was granted or denied.