PLYMOUTH COMMUNITY HOMES
CCTV POLICY (for residential properties)

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1. Introduction

This policy outlines the way in which Plymouth Community Homes (PCH) will use Closed Circuit Television (CCTV). This policy applies to the use of CCTV at PCH residential property. This policy does not apply to the use of CCTV at PCH offices and depots.

Plymouth Community Homes recognises its responsibility to provide an environment where, as far as possible, our residents can benefit from quiet enjoyment of their properties. We recognise that a key element of this is working to prevent anti-social behaviour and crime in and around our properties and to create safe environments where people want to live. We acknowledge that there are a range of ways in which we will achieve these aims, and that one of these may be the installation of CCTV.

Our policy in relation to CCTV is therefore to be responsive to requests from residents or housing staff for CCTV, and to consider these requests on a case by case basis. Where the request can be shown to be the best solution to prevent anti-social behaviour and crime, or otherwise to improve the safety of the environment for residents – and that our requirements relating to, for example, support from residents and value for money are met - we are likely to support the request.

Our policy is therefore to be responsive to requests and to consider these on an individual basis, and is not to pursue wider proactive installation across our existing properties.

In terms of new development we may consider installation on a case by case basis, ensuring that a proposed scheme meets the aims set out above relating to preventing anti-social behaviour and crime and creating a safe environment.

As a Housing Association, PCH is not subject to the Regulation of Investigatory Powers Act (2000) (RIPA). However, to ensure best practice, PCH will take account of the guidelines set out in the Information Commissioner's Office *"CCTV code of practice"*. The full code of practice can be found at www.ico.gov.uk.

2. Policy objectives

The objectives of this policy are:

- To ensure that CCTV is used as an effective tool in helping us achieve our aim of preventing anti-social behaviour and crime in and around PCH residential property, and creating safe environments where people want to live.
- To ensure that PCH is following best practice and is acting within the law.
- To ensure that installing CCTV represents value for money.
- To outline how and when PCH will provide access to recordings.

3. What is Closed Circuit Television (CCTV)

CCTV is a surveillance system that comprises cameras, recorders and viewing screens. Modern CCTV systems use digital video recorders (DVRs) and digital 'network cameras'. These cameras have higher resolution than previous models, and provide greater installation flexibility. CCTV cameras may be placed in areas such as stairways, car parks, communal and public spaces, lifts and entrances.

4. The installation of CCTV

Residents who would like CCTV in their area should contact their Housing Officer. If the scheme fits within the requirements of this policy, and if, after consideration of other options such as improved lighting, CCTV is shown to be the best option, the Housing Officer can assist residents to explore sources of funding such as the Money Tree Fund. In addition, PCH may on occasion choose to install a CCTV system as part of a health and safety based risk assessment.

An initial assessment should always be carried out to determine the objectives of the scheme. The fact that it is possible, affordable or has public support should not override the agreed objectives nor be the primary motivating factor. The extent of assessment will depend on the size of the proposed scheme and the level of impact it is likely to have on people's privacy. The assessment should also consider factors such as the likely cost of the scheme, whether planning may be required and how the images will be kept secure. The assessment should also specifically include a data protection impact assessment, which will assess the potential impact on individual privacy and compliance with data protection legislation. The Senior Housing Officer must recommend the initial assessment or business case before it is presented to the approving manager or panel.

In most cases PCH will install CCTV only when 60% of residents in the building support the installation, and subsequent costs such as maintenance costs will be charged to residents as a service charge. PCH will maintain a register of all CCTV systems installed.

5. The siting of CCTV cameras

When siting new CCTV cameras, PCH staff must at all times comply with the Data Protection Act 1998 and must comply with the *"CCTV code of practice".*

All cameras will be located in prominent positions within public and staff view and must not face directly into residents' property.

Signs will be erected to ensure staff, residents and visitors are aware they are entering an area that is covered by CCTV. The signs will include the PCH logo and the relevant contact details.

Upon installation, all equipment including cameras must be tested to ensure that only the designated areas are monitored and high quality pictures are available in live and playback mode.

Some door entry systems have inbuilt cameras to allow for greater security within the building. PCH will treat the images captured by these cameras in the same way as images captured by CCTV cameras.

6. Storage of evidence

Currently all recorded images are recorded and securely stored on digital video recorders (DVRs). If images are downloaded to other media, such as discs, these will also be kept securely, and where appropriate, password protected. Recorded images will be stored for a maximum of 28 days, unless required for evidential purposes. This is in compliance with the PCH data protection principles.

7. Access to recorded images

Access to recorded images will be restricted. Only the Housing Officer or Assistant Housing Officer may view images recorded on their own patch. Any internal request for access or use of CCTV images and all viewing arrangements - including from other staff working on the same patch (such as Rangers) - must be overseen by the Senior Housing Officer (or above) for the area in which the CCTV is situated or a member of Human Resources (Business Partner or above). In the absence of the Senior Housing Officer for the area in which the CCTV is located, another Senior Housing Officer must be contacted.

Images recorded by CCTV on PCH property will be used only by PCH, except in the following circumstances:

- Where PCH is statutorily required to share CCTV recordings with third parties such as the Police. Where PCH is required to share images, an Area Manager (or above) must authorise the granting of the request, and a written record of any such disclosures will be kept.

- Where an individual makes a request to view images of themselves, this must be treated as a subject access request and forwarded to the Governance team. We will comply with the CCTV Code of Practice when dealing with such requests.

- At Tavy House, Lynher House and Tamar House - PCH's tower blocks in Mount Wise - PCH employs a contractor to provide fire wardens in each of the three buildings. These fire wardens may view CCTV recordings for these buildings where it is required to assist with their fire risk management duties.

8. Recording of sound

PCH will meet the guidance set out in the Information Commissioner's Office *"CCTV code of practice"* relating to the recording of sound. This states that only in exceptional circumstances should conversations be recorded and where audio equipment is supplied with a sound recording facility, this should be turned off or disabled. PCH will therefore not generally record sound, and do so only where the circumstances meet the requirements of 'exceptional circumstances' as set out in the *"CCTV code of practice".*

9. Private cameras operated by residents

Residents who intend to fix a CCTV camera to their residence must apply to PCH for permission before installation. The CCTV camera must capture only the resident's property and must not capture either communal areas or other residents' property. PCH will not unreasonably withhold consent for any requests from customers to install private CCTV equipment.

Housing Officers will be responsible for dealing with applications from customers to install CCTV equipment on their residence. Permission will be granted only after the tenant has signed that they have read and understand the *"CCTV code of practice"* and the obligations they must abide by. The application must be approved by a Senior Housing Officer.

Should CCTV become the implicated reason in a neighbour dispute or an allegation of harassment is made then PCH upholds its right to withdraw permission and to request that cameras are removed.

The use of cameras for limited household purposes is exempt from the Data Protection Act. This applies where an individual uses CCTV to protect their home from burglary. Images captured for recreational purposes, such as with a mobile phone, digital camera or camcorder are also exempt.

10. Monitoring arrangements and maintenance

The use of the CCTV units will be reviewed regularly by the Housing Officer to ensure that the scheme is complying with legal obligations and the *"CCTV code of*

practice" and to evaluate its effectiveness. The Housing Officer will keep a written record of the review.

All CCTV equipment should be serviced and maintained on an annual basis.

11. Training

The CCTV equipment will be available only to staff who have been adequately trained. Members of staff who have undergone training may conduct in-house training. Minimum training requirements will include technical knowledge sufficient to operate the equipment along with an understanding of the implications of Data Protection and Human Rights Legislation.

All staff will have access to the Information Commissioner's Office "*CCTV code of practice"*.

12. Data Protection

In applying this policy, all members of staff must comply with PCH's Data Protection Policy and ensure that the personal information supplied by customers is protected at all times.

Any staff found abusing the CCTV system will be subject to disciplinary action in accordance with the PCH Disciplinary Policy.

13. Equality and diversity

PCH will apply this policy consistently and fairly, and will not discriminate against anyone based on any relevant characteristics, including those set out in the Equalities Act 2010.

PCH will make this policy available in other languages and formats on request.

PCH will carry out an equality impact assessment on this policy, in line with our corporate procedure.

14. Review

PCH will monitor this policy to ensure it meets good practice and current legislation and will review it in accordance with our review timetable for all policies.