



City of London Corporation
Department of Community & Children's Services
Housing Service

Closed-Circuit Television (CCTV) Policy

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| Approved by: | |
| Approval Date: | |
| Review Date: | |

1. Introduction

This policy sets out our approach to the use of CCTV on our housing estates. Closed-circuit television (“CCTV”) systems are used on some estates to monitor public or communal spaces and help in the prevention and detection of crime and anti-social behaviour.

The presence of CCTV can provide reassurance to residents and visitors on our estates, but they must also have confidence that data captured on these cameras is handled in accordance with data protection principles.

Self-installed CCTV is a growing phenomenon, and this policy outlines our approach to the use of CCTV by private individuals on our estates.

2. Policy Scope

This policy applies to City of London housing estates which we manage as part of the Housing Revenue Account (HRA).

The policy covers:

- CCTV systems (generally cameras, recording equipment and viewing screens)
- Self-contained image recording devices (e.g. doorbells with integrated cameras)
- Automated camera systems (e.g. Automatic Number Plate Recognition (ANPR) systems)

3. Policy Aims

This policy aims to:

- ensure a consistent and proportionate approach to the use of CCTV and other recording equipment
- maintain the safety of our housing estates, and our residents, staff and members of the public who access our estates
- ensure that we process recordings with due regard to data protection regulations
- explain our approach to private use of CCTV systems by residents and commercial entities

4. General principles

Under the Protection of Freedoms Act 2012, we must have regard to the *Surveillance Camera Code of Practice* (“the Code”), which sets out principles for the use of CCTV by public authorities.

In general, we will:

- Install CCTV only when there is a pressing need for it at a specific location
- Make clear the specified purpose for which the system is going to be used
- Carry out a Privacy Impact Assessment before any new installation, or the modification of an existing system
- Ensure that there are clear lines of responsibility and accountability for the CCTV systems that we operate as a landlord
- Have clear policies and procedures relating to the use of CCTV and the handling of data captured by such systems
- Ensure that all images and information are held securely and accessed only as necessary, by authorised staff, for legitimate purposes
- Consult affected residents before installing new or additional CCTV

5. Siting of Cameras

If we install CCTV cameras, we will place them in relevant communal areas such as hallways, car parks, block entrances, cycle stores, stairwells, lifts and reception areas.

We will display clear and prominent signage stating that CCTV monitoring is in progress and identifying the data controller and their contact details.

6. Management of Systems

We will keep a central register of all our CCTV systems, including the location and type of system in use.

We will ensure that our systems are regularly serviced and maintained and that components are updated or renewed as required. We will remove obsolete or inoperative parts if we cannot replace them.

7. Monitoring and Reviewing Data

We do not continuously monitor our CCTV systems, and we will only access and review recorded images if there is sufficient reason to do so.

Reviewing footage can be time-consuming. If we receive a request to review footage, we will consider whether the staff time it will take to search for the recorded images is justified given the nature and seriousness of the reported incident. We reserve the right to decline a request to review recorded images if the event is trivial or cannot be narrowed down to a reasonable period.

8. Covert CCTV Surveillance

The *Regulation of Investigatory Powers Act 2000* (as amended) and the *Protection of Freedoms Act 2012* govern the use of covert surveillance by public authorities.

We will comply with our obligations under these Acts and other relevant legislation, as well as the associated *Covert Surveillance and Property Interference Code of Practice*.

Covert surveillance of public areas on our estates will be police-led and will only be considered in exceptional circumstances when it is deemed to be both a necessary and proportionate step in response to a specific case of serious crime or anti-social behaviour (as defined in the legislation and guidance).

We will complete a full assessment of any privacy implications before seeking any authorisation for covert surveillance.

We will work with the City or Metropolitan Police to consider whether covert surveillance is justified in the case in question and to make the relevant application for approval.

9. Data Protection and Data Security

The Housing Service will comply with the City of London's corporate [*Data Subjects' Rights Policy*](#) and relevant legislation.

Specifically, we will ensure that:

- We store all data captured by CCTV devices securely and use password protection. Data encryption may also be employed depending on the equipment in use
- Only authorised personnel have access to recording equipment and data held on these devices
- Data is accessed only as necessary
- Information is kept only as long as needed and deleted when no longer required
- We process data in accordance with the GDPR and Data Protection Act 2018 provisions and associated principles

We may share data with other agencies under data protection legislation and regulations, for instance when the police request CCTV images as part of a police investigation.

10. Subject Access Requests

Individuals may only access recordings or images of themselves, which we hold on our CCTV data storage systems, by making a Subject Access Request (SAR). We will deal with all SARs in accordance with the Data Protection Act 2018 and our corporate *Data Subjects' Rights Policy*.

We will respond to any SAR within one month, explaining whether we can comply with the request and, if not, the reasons why.

When making a SAR, the data subject is required to provide enough information to enable us to identify them as being the subject of the information held on our systems.

All SARs should be sent to us at information.officer@cityoflondon.gov.uk or in writing to:

Information Compliance Team
Comptroller and City Solicitor's Department
City of London
PO Box 270 Guildhall
London EC2P 2EJ

11. Private CCTV and Recording Devices

We do not allow residents or commercial users to install their own CCTV to monitor areas owned or managed by the Housing Service or belonging to third parties. The presence of such cameras can intrude on the privacy of others and potentially cause people to feel harassed, which can lead to conflict between neighbours.

Residents and commercial users are permitted to monitor private areas exclusively within their demise or property boundary provided that they seek any necessary permissions and do not affix apparatus to our property.

When a resident or commercial user installs any camera or monitoring device without our permission, we reserve the right to take action to seek its removal.

If the device is placed on or affixed to our property, we reserve the right to remove it without notice, and we may charge the resident for the cost of doing so and for repairing any damage caused to our property.

12. Commercial Premises

The approach taken in paragraph 11 applies to tenants or licensees of commercial premises also. CCTV may only be installed if the system films exclusively within areas demised in the specific lease or tenancy. Commercial users are not entitled to monitor communal areas or neighbouring premises.

13. Training

We will ensure that we train relevant staff on the use and management of CCTV systems. They will be made aware of their responsibilities and obligations concerning the processing of data captured by CCTV cameras and stored on equipment that we operate.

14. Complaints

Any complaints regarding the implementation of this policy, including any decisions made by City of London Housing Service staff under this policy, can be submitted via the housing complaints procedure at housing.complaints@cityoflondon.gov.uk or to the Housing Complaints Team, Barbican Estate Office, 3 Lauderdale Place, London EC2Y 8EN.

15. Monitoring and Performance

We will monitor our use of this policy and its implementation, and report any relevant information at appropriate intervals.

16. Training

We will provide all staff responsible for implementing this policy with comprehensive training as required.

17. Equality and Diversity

This Policy has been subject to a full Equalities Analysis, and we will implement it in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010.

18. Accessibility

We will consider residents' needs when implementing this Policy to ensure fairness. We will make appropriate arrangements to ensure that residents with distinct communication needs are not unreasonably and disproportionately affected. We will provide communications in alternative languages or formats, or provide interpretation or transcription as required.

19. Policy Exceptions

In some circumstances, we may make an exception to this policy. We will provide the reasoning for any relevant decision to the affected parties on request. We will consider each application for an exemption or variation on its specific facts.

20. Policy Review

We will review this policy at least every three years, or following relevant changes to legislation, regulation or policy.

21. Legislation and Guidance

Legislation and Regulation

- Human Rights Act 1998
- Regulation of Investigatory Powers Act 2000 (as amended)
- Protection of Freedoms Act 2012
- Data Protection Act 2018
- General Data Protection Regulation 2018

Guidance

- *Surveillance Camera Code of Practice* – The Home Office (2013)
- *Covert Surveillance and Property Interference Code of Practice* – The Home Office (2018)
- *Guide to the Regulation of Surveillance* – The Surveillance Commissioner (2019)

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