

## APPENDIX 2

### Results of consultation

#### Draft Closed-Circuit Television (CCTV) Policy

March 2019

1.	<p>I've read the draft report and as usual it's a very clear and well written document. However, could you consider my points relating to "Self Installed CCTV?" The document says on page 2 that this is a growing phenomenon, and one of my colleagues has a camera covering the external areas of her house and entrance door. There are many products that can be installed that not only allow recording of the inside of your own demised area for safety, but there are also doorbells that allow the user to see who is at the front door. This obviously means that the common areas are monitored, and the camera could also record other tenants' private front doors, as well as residential communal areas, which section 11 says isn't possible.</p> <p>Any installed camera that looks to see who is at the front door will almost certainly cover residential common areas. I don't know how this can be avoided, as there's an obvious demand for such cameras. A balance between private, residential security needs to be balanced next to the rights of other tenants. Quite a difficult issue.</p>	<p>Door bell cameras are classed as CCTV for the purposes of this policy, as they are capable of capturing and storing moving images.</p> <p>If such a camera is installed, and it monitors a communal area, this would breach our current policy.</p> <p>Cameras installed for private security purposes are still subject to data protection rules.</p> <p>We do appreciate that people may have genuine reasons for wishing to install their own CCTV and if a resident believes their case is exceptional, they should contact us to discuss it.</p>
2.	<p>Re: section 9. I think it is important that a log is kept of all instances of access to CCTV recordings, including when the access occurred, who accessed and viewed recordings, which recordings and what recorded time periods were viewed, and what reason or authorisation justified the access. This log should be kept safe in unalterable form by the City of London, and available for authorised officers to access in order investigate any potential complaints or misuse of the system.</p>	<p>Essentially, this is a record of data processing. We will comply with our corporate obligations in recording the accessing and use of data.</p> <p>New procedures will be implemented for officers and they will reflect our corporate policies on data security and retention.</p>
3.	<p>The bullet "All data captured by CCTV devices is stored securely and password protected/encrypted as appropriate" is ambiguous. It does not make clear whether data has to be BOTH password protected AND encrypted, or</p>	<p>The wording has been clarified to say that password protection will be used and encryption will also be used if possible. This is dependent on the specification of the equipment used to record images.</p>

	whether it only has to be password protected OR encrypted. I think data should be password protected AND encrypted, and this should be clarified in this wording.	
4.	<p>There is no mention of whether it is acceptable to install CCTV inside your own home, for the prevention of burglary etc,?</p> <p>Also, I assume installing CCTV outside and above your front door, to monitor it, would not be acceptable?</p>	<p>It is acceptable to install CCTV in your own home provided you do not film property that does not belong to you (e.g. a camera in your window filming a communal area).</p> <p>In most cases, filming your own front door would not be possible as this would involve affixing a camera to property outside your demise (external walls and ceilings generally belong to the landlord).</p> <p>Residents can contact their Estate Manager if they are unsure about what they can or cannot do within this policy.</p>
5.	The policy reads clearly, and the content covers what would be expected	