

SA/27 - CCTV Policy

“Our policies embed our culture, establish boundaries and outline our expectations. They have been agreed by our Board(s) as best practice documents for the Group’s decision making.”

Policy Statement

This policy and any other documents referred to in it, sets out how ateb Group Limited, operates and manages its use of Closed-Circuit Television (CCTV) to provide a safe and secure environment for employees, customers and visitors to ateb's properties and premises. The Policy sets out the use and management of the CCTV equipment and images in compliance with the General Data Protection Regulation and the Data Protection Act 2018.

This policy applies to all ateb Group Limited, Mill Bay Homes and West Wales Care and Repair’s customers, Boards, stakeholders and employees.

Approval Date	Lead Contact	Review Date
24 th September 2020	Facilities Coordinator	September 2022

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2. Principles

The purpose of this policy is to detail the Group's approach to the purpose, use and management of CCTV system used by the Group.

In using and managing CCTV the Group will have due regard to the Data Protection Act 2018, The General Data Protection Regulations (GDPR) and any subsequent data protection legislation to include the ICO's data protection code of practice for surveillance cameras and personal information. In complying with the legislation the Group will ensure it is upholding the date protection principles enshrined within the legislation.

The principal purposes of the Group's CCTV systems are as follows:

- For the prevention, reduction, detection and investigation of crime and other incidents;
- To ensure the safety of customers, visitors, employees and the public;
- To monitor the security of ateb's properties and premises;
- To ensure that health & safety, fire safety rules and ateb's procedures are being complied with. Where any breaches are suspected CCTV may be used in any investigation or related disciplinary action.

Location of Cameras & Signage

Cameras are located at strategic points throughout the Group's properties and premises, principally at entrance and exit points. Cameras are positioned so that they only cover communal or public areas and sited to provide clear images. All cameras are clearly visible.

Details of camera locations can be found at appendix 1 to this policy. CCTV will only be in place for as long as needed. If the original purpose for CCTV ceases, the CCTV will be removed.

All our CCTV camera locations will have signs to inform persons entering the CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The CCTV signage indicates that the system is managed by ateb Group and include a telephone number/ contact details for any enquiries.

Any proposed new CCTV installation is subject to a Data Protection Impact Assessment in accordance with data protection legislation.

Recording and Retention of Images

Images produced by the CCTV are of suitable quality so that they are effective for the purpose they are required. Maintenance checks on the equipment are undertaken on a regular basis to ensure it is working effectively and the media is producing high quality images.

Images are recorded either in constant real-time (24 hours a day throughout the year), or only at certain times as the need dictates. This depends on the location and purpose of the CCTV. The schedule at appendix 1 to this policy provides this information.

All images recorded are stored for a maximum of 30 days

Access to and Disclosure of Images

Access to and disclosure of images recorded on CCTV is restricted. This ensures that the rights of individuals are protected.

All Group CCTV is managed by the Facilities Coordinator and access to images will only be given to employees who are authorised to view the CCTV in accordance with the purpose it was installed.

Viewing of recorded images will take place in a restricted area and only by those authorised to view the recordings. If the images are to be saved on removable media and taken away from site, this will be documented and appropriate security in place on the removable media.

ateb will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of GDPR with regard to CCTV.

Applications by individual data subjects

A customer/stakeholder/employee wanting to make a Subject Access Request (SAR) – a request to access personal data, is to make a formal request in writing to the Data Protection Officer. Further information regarding Subject Access Requests can be found in our Group Data Protection Policy.

When responding to subject access requests we will consider whether images of third parties need to be obscured before disclosing

Where the Group is unable to comply with a Subject Access request without disclosing

the personal data of another individual who is identified or identifiable from the information, we have the discretion to refuse a request unless there is an overriding legal obligation, we have the consent of the third parties, or it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Applications by third parties

In limited circumstances it may be necessary to disclose images to a third party, for example the police, when a disclosure is required by law for the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. These requests should be accompanied by an official written request. Such disclosures will be made at the discretion of the Data Protection Officer or Governance Co-ordinator.

Where a suspicion of misconduct arises and at the formal request of the People and Communications Manager, access to CCTV images may be provided for use in employee disciplinary cases. (See section 2 – purpose of CCTV).

All requests for disclosure and access to images will be documented, including the date of disclosure, to whom the images have been provided and the reasons why they have been requested. If disclosure is denied, the reason(s) will be documented.

Retention of Images

Unless required for legal or evidential purposes CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten and therefore deleted after this point.

Where an image is required to be held in excess of the 30-day period, the Data Protection Officer or Governance Co-Ordinator will be responsible for authorising the request.

Images held in excess of the 30-day period will be reviewed on a 3 monthly basis and deleted if no longer required for evidential purposes.

3. Responsibilities

Group

This is a Group Policy which applies to all companies within ateb's Group structure.

All companies within the Group are responsible for ensuring the policy is available to their customers, stakeholders and employees and for ensuring appropriate training, support and guidance given on its application and use.

The key responsibilities of this policy are as follows:

Board of Management

Responsibility for CCTV equipment lies ultimately with the Group's Board of

Management. They are ultimately responsible for ensuring our customers and staff are safe and our properties protected. The Board satisfies this responsibility by delegating duties to the Chief Executive who is responsible for ensuring that adequate resources are made available to enable the objectives of this policy to be met.

Chief Executive

- Effective operation of the CCTV Policy across the Group as a whole.
- Adequate resources are made available to both develop and implement appropriate procedures.
- Responsible for the implementation of the policy and to ensure sufficient and qualified resources are available.
- Enable responsibilities to be effectively delegated.

Executive Director of Customer

- Interface with Corporate Delivery Group.
- Report to Chief Executive.
- Ensure the CCTV policy for the Group is in place, maintained, monitored and reviewed.
- Enable responsibilities to be effectively delegated.

Facilities Coordinator:

- Day to day management and service and repair requirements of the CCTV systems at ateb properties.
- Managing the service contract for the servicing and repair of the CCTV systems.
- Monitor the quality of services provided by contractors and operatives ensuring compliance with contract conditions.
- Maintaining an up to date register of CCTV located at ateb's properties.
- Be present, with the authority of the Data Protection Officer, whilst images are being viewed, for example by the police in investigating a crime.
- Ensure that all appropriate CCTV signage is in clear view at all ateb sites that have CCTV.
- In conjunction with the Data Protection Officer and Governance Team, will ensure regular reviews of the CCTV policy are conducted and the policy amended as and when necessary.

Data Protection Officer

- Responding to and authorising or otherwise any requests for access to images held on CCTV at any of ateb's properties.
- Ensuring that records are kept of any such request, either from an individual or a third party.
- Dealing with complaints relating to this policy, please see below:

If you have any complaints or enquiries about the operation of ateb's CCTV system should be addressed to the Data Protection Officer at:

Ceri Barnett
Data Protection Officer
Meyler House
St Thomas Green Haverfordwest SA61 1QP
Tel: 01437 763688
Email: mydata@atebgroup.co.uk

ICT Team

- Extracting the required images on the authorisation of the Data Protection Officer.
- Supplying extracted images by secure email or by being in attendance whilst the images are being viewed.
Any images provided on removable devices will be logged by ICT and the log provided to the Governance Team.

Scheme Managers

- Scheme Managers are responsible for the security of the CCTV equipment at their schemes
- Ensuring no unauthorised use of or viewing of images.
- Monitoring equipment is to be kept in an office that is able to be locked when the office is unmanned.
- Reporting any defects with the CCTV equipment to ensure it is able to monitor the areas it has been installed to survey.

Area Officers

- Reporting any request for information from third parties, for example the Police.
- Ensuring that the request is accompanied by a Request to an external organisation for the disclosure of personal data to the Police (under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 018 or GDPR articles 6(1)(d) and 9(2)(c)).

All Staff

- Ensure compliance with this Policy.
- Complete a Data Protection Impact Assessment when proposing new CCTV.

4. Control

The Facilities Coordinator is the lead contact for this policy and for ensuring it remains operationally effective. The Facilities Coordinator will review this policy at least every 2 years.

This policy is a dynamic document and will be amended as required following service reviews or changes to the operating environment.

Board approval will be obtained before any amendments are published and employees will receive refresher training as applicable.

5. Links to Other Documents

Internal

- Privacy Notices for Customers, Employees can be found on our website: www.atebgroup.co.uk
- [Data Protection Policy PN01](#)

External

- Data Protection Act 2018/General Data Protection Regulations 2018
- Information Commissioners Office (ICO)

SA/27 – CCTV Policy

Additional help

Contact our Facilities Coordinator quoting the policy reference:

Tel: **01437 763688**

Email: **hello@atebgroup.com**

Facebook **@atebgroup**

Face to Face: **Meyler House, Haverfordwest, SA61 1QP**

Version History

Ver.	Date	Changes
1	24/09/2020	Policy approved by Board
2		
3		

CCTV installations at ateb properties

Address of Property or Scheme	Type of site / property	Is the CCTV monitored by ateb	Is there signage?	Service contract in place	Where is the CCTV positioned? what areas does it record ?
Kensington Court, Steynton, Milford	Extra Care	Yes	Yes	Yes	4 x cameras To the front of the building, looking towards the car park; front of the main building looking towards the bottom corner of the road which leads into the complex; far side of the building looking towards the road named Exeter Road; corner of the foyer area at the main entrance To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
De Clare Court, Merlins Bridge, Haverfordwest	Extra Care	Yes	Yes	Yes	12 cameras recording areas within DCC. Positioning and reason for observation on operational requirement doc. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Hanover Court, Haverfordwest	Sheltered	Yes	Yes	Yes	3 x cameras = 1 facing main entrance, 1 facing car park from direction of communal block, 1 facing back gate/bin store. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Hanover Court, Milford Haven	Sheltered	Yes	Yes	Yes	7 x cameras To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Hanover Court, Tenby	Sheltered	Yes	Yes	Yes	3 x camera viewing the front door and the back door at the back of the building and the car park. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Croft Court, Pembroke	Sheltered	Yes	Yes	Yes	8 x cameras covering car parks to detect vehicles and persons entering and leaving the premises to monitor parked vehicles and also for staff and customers safety
Paterchurch court, Paterchurch Court	Sheltered	Yes	Yes	Yes	2 x cameras To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Acorn Heights, Tenby	Sheltered	Yes	Yes	Yes	4 x cameras 1 inside the front door and 3 outside 1 on the path viewing the two basement doors 1 on the corner viewing the car park and 1 outside the front door viewing cars coming in. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Hilary House, Haverfordwest	Supported	No	Yes	Yes	3 x cameras Internal Communal areas & front garden To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Refuge, PO Box 21, Haverfordwest	Supported	No	Yes	Yes	4 x cameras Internal Communal areas & front garden To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Northgate House, Haverfordwest	Supported	No	Yes	Yes	3 x cameras Internal communal areas and communal yard. To detect persons entering and leaving the premises, and also for staff and client safety

Wesley Court, Tenby	General Needs	Yes	Yes	Yes	2 x cameras Garage, foyer, corridors To detect vehicles and persons entering and leaving the premises, to monitor the
St Mary's House,	General Needs	Yes	Yes	Yes	6 x cameras covering Communal areas and entrance door To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
The Delphi, Tenby	General Needs	Yes	Yes	Yes	6 x cameras covering Communal areas and entrance door To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
St Clements Road, Neyland	General Needs		Yes	Yes	1 x camera Entrance to the carpark To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety
Williams Court, Narberth	Sheltered	Yes	Yes	Yes	6 x camera External Communal areas, Car Parks , Entrances. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and also for staff and client safety