



CCTV Policy

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Student - Professional - Commercial Property Lets In RCT & Merthyr Areas

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1.0 SCOPE

Purpose

- 1.1 This document sets out Phillips Property Management (South Wales) LTD' policy on the use of Closed Circuit Television Schemes (CCTV). The document also includes the principles by how our CCTV Scheme will be operated, managed, and how access can be gained for recordings.
- 1.2 The CCTV System is a surveillance system that comprises of cameras, recorders and viewing screens. Our systems currently consists of Internet Protocol (IP) cameras, DVR/NVR Recorders and remote monitoring equipment. The CCTV cameras may be sited internally such as communal hallways, stairways and main entrances or externally such as car parks, exterior areas of the property and public spaces.
- 1.3 The CCTV Scheme and System is in place to provide our tenants, visitors and community with added reassurance that their homes and neighbourhoods are safe and protected. However, it is crucial that those who come in contact with the systems have the confidence that the scheme is operated professionally and that we strictly follow the Policy. The system is not in place in order to "spy" on people.

Policy Applies to

- 1.4 Phillips Property Management (South Wales) LTD C S Phillips Property Developments LTD

2.0 POLICY STATEMENT

Use of CCTV

- 2.1 The Scheme and Systems are operated and are recording 24 hours a day and 365 days a year.
- 2.2 The Scheme and System is used for the following
 - For the prevention, detection and reduction of crime and other incidents
 - To protect and ensure the safety of tenants, visitors, staff and members of the public
 - To assist in investigations of suspected breaches of Company Policies, Regulations and Tenancy Contracts relation to staff, tenants and occupants of rental properties
 - To support the Police in a bid to deter and detect crime by providing evidence in support of enquiries, investigations and prosecutions
 - To support the community by monitoring and recording public areas for the prevention, detection and reduction of crime and other incidents
- 2.3 Individuals found to be responsible for criminal or civil acts may then be the subject of enforcement action or persecution
- 2.4 Requests maybe submitted to move CCTV equipment or monitor certain areas but the final decision will be made by the System / Scheme operator who will look at the each request individually and looking at any evidence to support the request.
- 2.5 Body Worn Cameras (BWV) maybe used for certain activities carried out by staff of the business named on page 1 of this policy. BWV are usually used as evidence such as evictions etc. Footage stored on the devices will be downloaded and stored in accordance with this policy.

Installation

- 2.6 A consultation period will be held and engagement will be carried out with members of the public and other agency partners prior to installation to gain their views and to decide if the scheme / system is appropriate.
- 2.7 Signage will be displayed in areas in which will be covered by the CCTV Scheme. The signage will also display the name of the System Operator and will also display a Contact Number / Details for the operator.

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Retention of Images and Recordings

- 2.8 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV Images and Recordings will be retained for no longer than 30 days from the date of capture. Images and Recordings will be overridden if still on the system once the 30 days have been reached. Most of our systems will only store up to 7 days of recordings.
- 2.9 Recordings and Images will primarily stored on the Network Video Recorder (NVR) or Digital Video Recorder (DVR) at the property in which the CCTV Camera (s) are sited at but footage and images may also be monitored and stored off site at our Office all of which will still be kept in compliance with this Policy.

Application for Disclosure of Images or Recordings

- 2.10 Requests by individual data subjects for images and recordings relating to themselves "Subject Access Request" should be submitted in writing to the Scheme Operator along with proof of identification and the correct fee.
- 2.11 In order to locate the data requested on the system, sufficient detail must be provided by the data subject in order to allow us to locate the relevant files and identify the subject on the footage.
- 2.12 Where the Operator of the Scheme / System is unable to comply with the Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from the information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure or if it has reasonable, having regard the circumstances, to comply without the consent of the individual.

Access to and disclosure of images and recording to third parties

- 2.13 A request for images by 3rd parties must be made in writing to our Scheme Operator
- 2.14 In certain circumstances it may be appropriate to disclosure images to a third party, such as when disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 2.15 Such disclosures will be made at the discretion of the Scheme Operator who will look at the case individually.
- 2.16 Under the discretion of the Scheme Operator, disclosures maybe authorised in certain circumstances in order to investigate breaches relating to the property Tenancy Contract and for evidential purposes if further action is taken.
- 2.17 Full records will be kept for any CCTV Footage disclosures made under this Policy. Details recorded are date, time, camera ID, requestor, authoriser and the reason for the discourse along with any supporting documentation.
- 2.18 All discourse requests made to the Scheme Operator will be dealt with within 30 days.

3.0 COMPLAINTS PROCEDURE

- 3.1 Complaints concerning the use of the CCTV Systems, Operators, or disclosures of images and recordings should be made directly to the Scheme Manager in writing.
- 3.2 All complaints received will be dealt within a timely manner allowing the Scheme Operator to fully investigate along with any other partners or agencies. We aim to fully complete and provide a outcome for the complaint within 30 days. Updates will be provided as and when suitable during the investigation.
- 3.3 Appeals against the decision of the Scheme Manager can be made in writing and sent to the Director of Phillips Property Management (South Wales) LTD.

4.0 MONITORING AND PROCESSING COMPLIANCE

- 4.1 All staff involved in the operation of the CCTV Schemes & Systems owned by Phillips Property Management will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained within.
- 4.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV footage will be required to undertake Data Protection Training.

5.0 POLICY REVIEW

- 5.1 This policy will be monitored by the Company Director and reviewed annually by the Scheme Manager with reference to the relevant legislation or guidance in effect at the time of review. The policy will also be reviewed continually for its suitability adequacy and effectiveness.

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6.0 DATA PROTECTION COMPLIANCE AND REGULATORY FRAMEWORK

- 6.1 In its administration of the CCTV System, Phillips Property Management complies with the Data Protection Act 1998. Due regard is given to the data protection principles embodied in the Data Protection Act. These principles require that personal data shall be:
- Processed fairly and lawfully;
 - Held only for specified purposes and not used or disclosed in any way incompatible with those purposes;
 - Adequate, relevant and not excessive;
 - Accurate and kept up to date;
 - Be kept no longer than necessary for the particular purpose;
 - Processed in accordance with the rights of individuals;
 - Kept secure; and
 - Not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.
- 6.2 From 25th of May 2018, we will also comply with the GDPR (General Data Protection Regulation). Due regard will be given to the Data Protection principles contained within Article 5 of the GDPR which provide that personal data shall be:
- Processed lawfully, fairly and in a transparent manner;
 - Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible for those purposes;
 - Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - Accurate and, where necessary, kept up to date;
 - Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
 - Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using technical or organizational measures.
- 6.3 CCTV Schemes & Systems that process personal data must conform to the Data Protection Act 1998, the Human Rights Act 1998, the Freedom of Information ACT 2000 and the Protection of Freedoms Act 2012.
- 6.4 We will act in accordance with the Information Commissioner's Office (ICO) "Code of Practise 2013" under the Data Protection Act 1998 covering the use of CCTV and the "CCTV Code of Practise" issued by the Surveillance Camera Commissioner as required by the Protection of Freedoms Act 2012. We are registered with the Information Commissioner's Office under registration A8354051.
- 6.5 We and the Scheme will also ensure that we comply with any other mandatory rules or regulations and any recommendations to ensure we will comply with the law.