FORUM HOUSING ASSOCIATION

Forum Housing Association is fully committed to all principles of Equality and Diversity and takes an approach which recognises the importance of the nine Protected Characteristics covered by the Equality Act (Age, Disability, Gender Reassignment, Pregnancy and Maternity, Race, Religion or Belief, Marriage and Civil Partnership, Sex, Sexual Orientation). As a demonstration of our commitment, this policy and procedure has had an Equality Analysis undertaken on it to ensure we offer a service and employment that is inclusive for all.

CLOSED CIRCUIT TELEVISION (CCTV) MANAGEMENT AND DATA SHARING

POLICY

Forum Housing Association acknowledges its legal responsibility with regard to data management and will ensure compliance, best practice and quality standards are adhered to at all times.

The Association will perform business in an open and accountable way and make information available to interested appropriate persons including police.

The Association accepts the obligation to be publicly accountable with regard to its usage of Closed Circuit Television (CCTV) and agrees that the purpose of the use of CCTV cameras is to ensure:

- All service users, staff and other persons who might use the premises are safe
- The security of its properties
- To deter any potential criminal activity
- To aid investigations
- Monitoring and management of its resources

Association staff will only use the equipment for the above agreed purposes.

There will be appropriate signage at each site where CCTV is in use and this will detail the purpose of the system. This signage will comply with Code of Practice guidelines.

All new service users will be issued with information regarding usage of CCTV and their right of access to CCTV data.

Forum Housing Association are registered with the Information Commissioner’s Office (ICO) with regard to usage of CCTV and will act in accordance with relevant legislation and its own policies and procedures with regard to holding and sharing of data; this includes:

Legislation

- Criminal Justice and Public Disorder Act 1994
- Criminal Procedures and Investigations Act 1996
- Crime and Disorder Act 1998
- Data Protection Act 1998 in the creation and holding of personal data.
- Human Rights Act 1998
- Freedom of Information Act 2000
- Human Rights Act 1998
Association Policies and Procedures

- Safeguarding and Child Protection
- Safeguarding and Adult Protection
- Health and Safety
- Lone Worker
- Violence and Aggression
- Anti-Bullying
- Confidentiality
- Harassment - Staff
- Media
- Complaints – Service Users

These lists are not exhaustive.

The Association will ensure that CCTV cameras and usage will be:

- Fair, reasonable, proportionate and lawfully processed
- Held only for the purposes specified
- Adequate, relevant and not excessive
- Not kept for longer than is necessary
- Processed in accordance with individuals rights
- Secure

PROCEDURE

Use and Maintenance of CCTV

Any member of staff operating the CCTV system will be trained to do so and act with the utmost probity at all times.

No cameras forming part of the CCTV system will be installed in a covert manner.

No cameras forming part of the CCTV system be used to view accommodation areas.

The Association will undertake a CCTV assessment when a new CCTV system is installed or when additional cameras are installed onto an existing system. An annual risk assessment will also be completed at all sites where CCTV is used. These assessments will be undertaken using the Association’s Risk Assessment document (H&S-12).

The assessment will ensure:

- The appropriateness of the surveillance equipment
- That the positioning of such equipment is satisfactory (service users will be included in this process)
- Appropriate signage is in place regarding use of CCTV
- Recorded data is securely held
- Data is held for the agreed legal timescale
- Data disclosure parameters are clear to all parties
- Maintenance checks are regularly undertaken. The detail of these maintenance checks will be held by Head of Service (Estates and Risk Management) and by the Association’s approved contractors.
- Quality systems that meet the needs of all interested parties are installed.
- Data Controllers (Association staff) know how to respond to external requests for access to images.
Any faults or concerns with CCTV equipment should be reported within the job reporting process detailed in the Development and Estates policy. CCTV work requests will be designated as Urgent priority.

Management of Data / Images

Service Managers will have day-to-day responsibility within their agreed management area for the CCTV systems.

With regard to the management of recorded images the Association will:

- Ensure that the management of recorded data is held in a secure place
- Ensure date and time settings on the equipment is correct
- Ensure that camera locations are clearly identified on the system
- Ensure that all CCTV systems are set up to clear data automatically after the agreed period. Exceptional data, which is deemed to be required for Association or external purposes, will be copied over to the Association Servers and held for the required period.
- Ensure that data is held for no longer than necessary (e.g. 28 days except by exception) which includes the evidence of reportable activity or internal management issues.
- Ensure that staff are trained in the usage of CCTV management and are able to comply with the agreed processes with regard to data management and data sharing.
- Requests for data will be responded to within 5 working days.
- Project staff will liaise with the Head of Service (Finance and Performance) with regard to storing all relevant data on the systems.

Data sharing

Service Managers are accountable for the management of data within their agreed management area and will ensure that all staff comply with the parameters set out in this policy.

The Association will always act within the law and this may on occasions mean the disclosure of recorded data to third parties. The disclosure of any information to third parties must be in compliance with the agreed protocols and procedures and relevant parties will be made aware that data has been shared with a third party. These third parties will include local government staff including, Police, Social Services, and similar agencies. Information sharing agreements will be agreed upon by all relevant parties and signed up to where relevant.

Request for Information

Requests to view or to copy data must be made formally using the Data Access Request Form (CCT2). The requests must be forwarded to Head of Service (Estates & Risk Management) for approval.

Each and every request for data will be assessed on its own merits and “blanket exemptions” will not be applied.

Specific identifiable information disclosed will be agreed upon with the service user where required.

Complaints

Any persons that are unhappy with the management of CCTV or any related processes should use the Associations’ complaints procedure. Association staff will inform regarding this process.
This policy will be reviewed on at least a 3 year cycle, or sooner as directed.

Date of next review August 2016.

Staff non-compliance with this policy may result in disciplinary proceedings.

H&S-12 Risk Assessment Document
CCT2 Data Access Request Form