

# SA/05 - CCTV Policy

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Living Solutions

ateb

**“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 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.

<b>Approval Date</b>	<b>Lead Contact</b>	<b>Review Date</b>
September 2024	Facilities Management Lead	September 2026

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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 data 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 properties and premises.
- To ensure that health & safety, fire safety rules and ateb 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 are 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 includes 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 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, dependant 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 Management Lead 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 regarding 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 Coordinator.

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 more than the 30-day period, the Data Protection Officer or Corporate Co-Ordinator will be responsible for authorising the request.

Images held more than 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 the ateb 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.

### All Employees

All employees are responsible for ensuring they understand this policy and the controls in place to ensure the security of CCTV data. All employees are responsible for completing a Data Protection Impact Assessment when proposing new CCTV.

### Key Operational Role Responsibilities

In addition to the responsibilities listed above the following key roles have specific responsibilities for the operational delivery of the probity policy across the group:

#### Facilities Management Lead:

- 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 properties and premises.
- In conjunction with the Data Protection officer, ensuring only appropriate team members are viewing CCTV and that team members are trained to handle the data confidentially.
- Authorising requests for access to images held on CCTV in the absence of the Data Protection Officer.
- 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 (with support from Corporate Co-Ordinator)

- Responding to and authorising or otherwise any requests for access to images held on CCTV at any of ateb properties and ensure only appropriate team members are accessing images in conjunction with the Facilities Management Lead.
- 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 CCTV systems, these should be addressed to the Data Protection Officer at:

**Ceri Morgan**

**Data Protection Officer**

**Meyler House**

**St Thomas Green Haverfordwest SA61 1QP**

**Tel: 01437 763688**

**Email: [mydata@atebgroup.co.uk](mailto:mydata@atebgroup.co.uk)**

### **Digital Services Team**

Providing advice and assistance to ensure the safe extraction and storage of CCTV images.

### **Independent Living Coordinators**

- Independent Living Coordinators 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 a room that can be locked.
- Reporting any defects with the CCTV equipment to ensure it can monitor the areas it has been installed to survey.
- Viewing CCTV images and extracting safely if required and authorised to do so by the DPO or Facilities Management Lead.

### **Out of Hours Team Members**

- Team members working out of hours are authorised to view and provide CCTV images to the authorities in an emergency. (Emergency situation is one where the request cannot wait to be authorised by the DPO or Facilities Management Lead during normal office hours.)

### Housing Coordinators

- 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).

## 4. Control

The Facilities Management Lead is the primary contact for this policy and for ensuring it remains operationally effective. The Facilities Management Lead will review this policy at least every 3 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](http://www.atebgroup.co.uk)
- Data Protection Policy

### External

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



## Additional help

Contact our customer team  
quoting the policy reference:

Tel: **0800 854 568**

Email: **hello@atebgroup.co.uk**

Facebook **@theatebgroup**

Face to Face: **Get in touch and we can arrange a location**

## Version History

Ver.	Date	Changes
1	24/09/2020	Policy approved by Board
2	29/09/2022	First Policy Revision approved by Board
3	05/08/2024	Policy approved at Business Review approved by EMT

## Appendix 1 – CCTV Policy

<b>CCTV Installations at ateb properties</b>					
<b>Address</b>	<b>Property / Site Type</b>	<b>Is the CCTV monitored by ateb?</b>	<b>Is there signage?</b>	<b>Service Contract in Place?</b>	<b>Where are cameras positioned?</b>
<b>Kensington Court, Steynton, Milford Haven.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	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 for staff and customer safety.
<b>De Clare Court, Merlins Bridge, Haverfordwest. (Including Perrots Lodge)</b>	<b>Scheme / Supported</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	12 cameras recording areas within site. Positioning and reason for observation on operational requirements doc. To detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and for staff and customer safety.
<b>Hanover Court, Haverfordwest.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	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 for staff and customer safety
<b>Hanover Court, Milford Haven.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	7 x cameras to detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and for staff and customer safety.
<b>Hanover Court, Tenby.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	4x cameras 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 for staff and customer safety.
<b>Croft Court, Pembroke.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	8 x cameras covering car parks to detect vehicles and persons entering and leaving the premises to monitor parked vehicles and for staff and customer safety
<b>Paterchurch Court, Pembroke Dock.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	2 x cameras to detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and for staff / customer safety
<b>Acorn Heights, Tenby.</b>	<b>Scheme</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	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 for staff and customer safety
Refuge PO Box 21 '2 Park Villa Court'	Supported	Yes	Yes	Yes	4x cameras Internal communal areas & front garden to detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and for staff and customer safety
Northgate House	Supported	Yes	Yes	Yes	3 x cameras Internal communal areas and communal yard. To detect persons entering and leaving the premises, and for staff and customer safety
Wesley Court, Tenby	General Needs	Yes	Yes	Yes	x2 cameras covering garage, foyer, and corridors, to detect people and vehicles entering the premises and for staff and customer safety.
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 for staff and customer 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 for staff and customer safety
St Clements Road, Neyland.	General Needs	Yes	Yes	Yes	1x camera entrance to the carpark to detect vehicles and persons entering and leaving the premises, to monitor the parked vehicles and for staff and customer safety
Williams Court, Narberth.	Scheme	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 for staff and customer safety
Meyler House, Haverfordwest.	Offices	Yes	Yes	Yes	2x Cameras external communal areas, car parks, entrances. To detect vehicles and persons entering and leaving the premises for property security.