CCTV Policy

1. What this policy is about

1.1 This Policy outlines our approach to the use and control of Closed-Circuit Television (CCTV) and the data it generates. It is essential for ensuring the safety of our customers and visitors while also serving as a deterrent against crime.

1.2 The policy ensures compliance with our legal obligations, including the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA18), as well as aligning with the provisions of the Information Commissioner's Office (ICO) CCTV Code of Practice.

1.3 It applies to both overt and covert CCTV installations that are owned, approved, or operated by Livv, and includes the footage captured by these systems, as well as the responsibilities of those authorised to operate or manage CCTV, including colleagues, contractors and partners.

1.4 We recognise the importance of CCTV in maintaining a secure environment and the crucial role it plays in enhancing safety and preventing criminal activities.

2. Our approach

2.1 We will take a proportionate approach to the use of both overt and covert CCTV relevant to our activities. We hold a record of all CCTV deployed where we are the Data Controller.

2.2 We will monitor live CCTV footage 24/7 and will ensure all operators who access and review this footage are fully licensed under the SIA CCTV Operators Scheme, ensuring that they are qualified to handle the surveillance systems and maintain compliance with relevant security standards and regulations.

2.3 We will use CCTV for the following purposes:

- Deter and detect criminal activity
- Prevent and tackle anti-social behaviour
- Promote the personal safety of our customers and reduce the fear of crime
- Protect the health, safety and security of our colleagues
- Protect the asset value of our buildings and developments
- Assist in the detection of crime and identification of individuals by providing CCTV footage to relevant authorities to enable them to take law enforcement action

2.4 We will only use covert image capture in exceptional circumstances, supported by a Purpose and Use Document, CCTV Privacy Impact Assessment (CCTV PIA) and with relevant approval. Continuing review and consideration of need to utilise this type of capture will be undertaken.

2.5 We will ensure any Livv colleague footage is not used for the purpose of monitoring productivity.

2.6 We will not use CCTV in areas where there would be a reasonable expectation of heightened privacy for example bathrooms or changing rooms.

Commissioning and location

2.7 We will ensure that all CCTV is sufficiently commissioned. This will include a CCTV PIA which will be subject to regular review through the life of the installation and approval from the Data Protection and Insurance Officer as outlined within section 3.

2.8 Our assessment will form the basis for the purpose and use document which will be in place for every scheme, subject to annual review and includes the clear lawful basis (as set out in GDPR Article 6) for use. The assessment aligns with the ICO Data Protection Code of Practice for Surveillance Cameras and Personal Information.

2.9 Camera location forms part of commissioning and regular assessment activity, we will consider their location and field of view aligned to the legal basis for purpose and use.

2.10 At times we may commission temporary CCTV cameras in key areas to prevent and tackle specific cases of anti-social behaviour. These cameras will be deployed to monitor and deter inappropriate activities, helping to create a safer space for customers, colleagues and the public. The use of all temporary CCTV will be in line with this policy.

CCTV equipment

2.11 We will ensure CCTV system commissioning and maintenance is carried out in accordance with industry standards that are relevant to its intended purpose. This includes:

- Annual inspections for preventive and corrective maintenance of the CCTV system.
- Regular desktop checks of all CCTV systems to confirm satisfactory operation.
- If we determine that a CCTV system or camera is not functioning, we will respond within 24 hours to perform the necessary repairs. If a camera is beyond repair, we will replace it to ensure the issue is resolved correctly on the first attempt.

2.12 We will ensure the quality of recording, use of pixelation and security of recorded material is aligned to Data Protection and ICO CCTV Code of Practice expectations.

2.13 The Group does not use automatic facial recognition technology, sound recording or broadcast messaging.

Storing images

2.14 Images will be stored only for the time necessary in line with the Purpose and Use document, CCTV PIA and legal basis. This is at most 30 days or 90 days for bookmarked images.

2.15 Images will only be stored for longer than 90 days in exceptional circumstances, for example a Court request, where a written record of circumstances will be approved by the Defined Owner along with a date for deletion.

2.16 We will ensure recorded images will be held securely and only accessible to authorised colleagues, partners or contractors.

2.17 Images for deletion will be removed securely and permanently.

Awareness

2.18 We will provide clear, visible and comprehensive signage identifying where overt CCTV coverage is in place, in line with good practice. We will also ensure reference to privacy information, contact and further information sources are available at all locations.

Subject access requests (SAR)

2.19 We consider requests from anyone who believes that they have been filmed by CCTV, subject to Data Protection exemptions or prejudicing criminal enquiries or proceedings considerations, where these apply. The subject can request a SAR verbally, in writing or via email.

2.20 Requests should include the specific location, date and time and will be processed in line with the Group's Data Protection Policy. All requests are handled by the Data Protection and Insurance Officer.

Disclosure requests

2.21 We can receive requests for CCTV footage from partners and third parties including the Police and other law enforcement agencies, solicitors, insurers or local authorities.

2.22 All requests for disclosure are subject to the following careful considerations:

- The purpose of the request, aim of the requestor and proposed use of the requested footage.
- Lawful grounds for disclosure.
- The rights of individuals.
- Disclosure to law enforcement agencies where failure to do so would likely prejudice the prevention and detection of crime, and an assessment has been made that the exemption in Schedule 2,1,2 of the Data Protection Act 2018 applies.

2.23 Written requests for disclosure through an approved CCTV Disclosure Request Form are required for every disclosure.

System access requests

2.24 We may receive a Police or other law enforcement agency request to use our CCTV systems for investigative purposes. These requests should be supported by a copy of the Regulation of Investigatory Powers 2000 (RIPA) authorisation for this surveillance. If provision of this authorisation is not possible e.g. in the event it may be restricted for investigatory purposes, a decision will be made by the Defined owner and Data Protection whether to allow access.

Decommissioning

2.25 Where a Defined owner review identifies CCTV is no longer required this will be decommissioned, including:

- Removal of equipment
- Destruction of images
- Removal of signage

Customer devices

2.26 Customers wishing to install CCTV or a video doorbell must obtain prior approval in accordance with our Home Improvement Policy, as these installations are considered alterations to the home.

2.27 The following will be taken into account:

- Recording should be restricted to the customer's own home, garden and outdoor spaces.
- CCTV or video doorbells must not capture footage of neighbouring properties, as this could infringe on their privacy.
- Before approval is granted for installation, neighbours must be consulted with and their feedback taken into consideration as part of the approval process.

Please refer to our customer handbook for further information.

3. Responsibilities

3.1 All colleagues are responsible for carrying out their work in line with this policy and associated procedures. The Director of Assets is responsible for overall implementation of this policy. Specific responsibilities are set out below:

Role	Responsibility
Executive Director of Property	Final approval of the policy. Act as nominated Health & Safety Lead under the Social Housing (Regulation) Act 2023
Director of Assets	Planned reviews and where necessary development of the policy in line with good practice. Overseeing the implementation of this Policy including the development and application of effective internal controls to support implementation.
Head of Assets	Responsible for overseeing the commissioning, deployment, management and use of CCTV. Complete regular reviews and monitoring to ensure compliance with this Policy, as well as with the expectations outlined for the Defined Owner and Facilities Management teams.
Assets Manager (Facilities Management)	Maintenance and review of: • Records of all CCTV deployed. • Commissioning assessments of CCTV PIA. • Installation compliance. • Ongoing review of the need for the use of covert CCTV to ensure its application remains appropriate. • Annual review of the purpose and use document for each scheme including the CCTV PIA to inform continued use and confirm image retention. • Identification of actions from annual assessment or continued management to maintain CCTV use within acceptable purpose and use definitions. • Regular checks on compliance with data retention. • Approving extended retention period requests and ensuring records of approval and agreed retention date are held and complied with.
Head of Facilities Management	Delivery of CCTV monitoring and management. Including: • Maintain procedures for overseeing monitoring, recording, access request and retention activity including training and communication to maintain effective and consistent application. *(continued)*

Role	Responsibility
	• Display and maintenance of signage relating to the operation and privacy references for CCTV use. • Secure storage and deletion arrangements in line with Retention Schedule. • Regular updates to the Defined owner on the use of CCTV. • Maintain a record of licensed SIA CCTV operators. All colleagues or third-party operators will obtain and maintain a Security Industry Authority (SIA) CCTV licence. Where third party providers/operators are used, the team will put in place and maintain contracts that reflect compliance with this Policy.
Data Protection and Insurance Officer (or deputising member of the Risk and Assurance Team)	Maintain a register of information assets which includes those relating to CCTV. Review and approval of: • Commissioning CCTV PIA. • Purpose and use document including lawful basis for use and privacy arrangements. Providing ongoing support and advice in the use of CCTV and Policy good practice in alignment with Data Protection and in relation to access to CCTV recordings and retention. Respond to subject access requests relating to CCTV in liaison with the Facilities Management team.

4. Monitoring and review

4.1 CCTV use is subject to regular monitoring through Defined owners and oversight of the purpose and use of each scheme, subject to annual review and CCTV PIA. Arrangements with third parties for the delivery of services are held in the Contract Register in accordance with the Contract Management Framework and access and disclosure is subject to approval and Data Protection oversight and relevant documentation held on file.

4.2 We will review this policy every three years, or sooner if our monitoring of the policy identifies that changes are required, for example because of changes to law, regulation or related Livv strategies and policies.

Control framework

Compliance

This policy supports compliance with:

- UK GDPR and Data Protection Act 2018
- Protection from Harassment Act 1997
- Anti-social Behaviour, Crime and Policing Act 2014

Document control	
Version	1.0
Policy applies from	12 February 2025
Policy applies to	Livv Housing Group
Approved by	Executive Directors' Team
Approved on	11 February 2025
Replacing	New policy
Review due by	February 2028
Responsible Executive Director	Executive Director – Property
Policy author	Head of Compliance & Legal Data Protection and Insurance Officer
Equality Analysis	5 February 2025
Environmental Impact Assessment	Not required
Circulation	Intranet; Livv Housing Group website

Version control		
Version	**Date of Review**	**Summary of changes made**
1.0	February 2025	New Policy