

Closed Circuit Television (CCTV) Policy

1.0 Introduction

One Manchester is committed to providing safe and secure neighbourhoods for our tenants and communities. One way we fulfil this commitment is by utilising overt and covert CCTV that includes recording devices where we own properties. The use of such technology has an important role in preventing and detecting crime and also gives our tenants and communities added reassurance, that their homes and neighbourhoods are safe and protected. However, it important we give residents confidence that we only use the images and recordings from our CCTV to protect and support them.

2.0 Purpose

This policy sets out the approach to using overt and covert CCTV that One Manchester will adhere to, while ensuring that the management and operation of CCTV including the management and protection of personal data that it holds about or concerning any individual, is compliant with associated legislation.

3.0 Scope

This policy applies to all CCTV systems owned and operated by One Manchester. This includes visible fixed installation CCTV's, and covert video recording devices. Also included are One Manchester employees, partners and contractors. One Manchester will only operate none live viewing CCTV and the purpose will be for viewing, reviewing and footage retrieval only.

4.0 The Policy

The guiding principles in our approach to managing our CCTV system are taken from the Information Commissioners Surveillance Camera Code of Practice Pursuant to Section 29 of the Protection of Freedoms Act 2012. The code has 12 principles and this policy states below how One Manchester will adhere to those principles.

4.1 ***Principle 1 - Use of surveillance camera systems must always be for specified purpose, which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.***

One Manchester will use CCTV for the purpose of dealing with

- a. Anti Social Behaviour or other Community Safety issues;
- b. Persistent fly tipping;
- c. Tenancy Management Issues;
- d. For the protection of our properties and capturing criminal damage;
- e. Support OM staff investigations;
- f. Compliance with data protection and/or subject access requests.

Direct requests by tenants to view, review or receive CCTV images or their requests for OM to view, review or retrieve CCTV images on their behalf will be refused unless they meet the data protection and/or subject access requests.

4.2 Principle 2 - The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

- One Manchester will only use surveillance when it is deemed as most appropriate way of capturing effective evidence. OM ensures an effective process is in place to review the use of the footage and continuing use of CCTV.
- CCTV will only be used in a covert way to capture crime or anti-social behaviour and other community safety issues.
- Overt CCTV will be used for the purposes outlined under Principle 1 and will not be used for such as facial recognition, or other biometric systems and will only be used to monitor public spaces.

4.3 Principle 3 - There must be as much transparency in the use of surveillance camera systems as possible, including a published contact point for access to information and complaints.

- One Manchester will have in place a process for accessing recordings via our data processes in line with GDPR and these are published on our website.
- Where CCTV is not being used for covert surveillance and for the monitoring of public spaces One Manchester will have appropriate signage in place to inform the public of the presence of the CCTV.
- One Manchester's complaints policy and process will deal with any concerns raised by residents in the use of CCTV.
- Any CCTV equipment used by One Manchester will ensure that all images are time and date stamped when being used as evidence.

4.4 Principle 4 - There must be clear responsibility and accountability for all surveillance camera system activities, including images and information collected, held and used.

- One Manchester will only retain CCTV images for evidential purposes linked to the areas of business outlined in Principle 1 and when they are no longer required they will destroyed in line with One Manchester's retention policy.
- When footage is transferred for evidential purpose to other bodies OM will satisfy themselves that the organisations data protection arrangements are compliant with regulatory requirements.
- In general One Manchester's CCTV system will not retain images for longer than 30 days as they are automatically over written

4.5 Principle 5 - Clear rules, policies and procedures must be in place before a surveillance camera system is used and these must be communicated to all who need comply with them.

- One Manchester will have in place clear procedures and processes for using CCTV and will have nominated individuals who are able to access view, review or retrieve footage. Any access to downloaded or retained images will also be restricted to named individuals.
- One Manchester's Data Protection Officer will be informed of any request for images as the matter will be treated as a Subject Access Request.
- One Manchester will have in place defined rules on who can gain access any retained or stored images.
- A clear process will be in place for the disclosure of images and information, which will only take place when it is necessary for such a purpose outlined under principle 1 or for

the purpose of law enforcement. In order to help prevent unwarranted identification of innocent parties, where possible steps will be taken to edit CCTV footage in order to obscure an individual/identifiable features One Manchester retains the right to refuse any request for information or images unless there is an overriding legal obligation such as a court order or information access rights.

- In line with legislation One Manchester will ensure where any CCTV system covers a public place cameras will be registered with the relevant authority.

4.6 *Principle 6 – No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once its purpose has been discharged.*

- One Manchester will not retain images for longer than is required as outlined under principle 4.

4.7 *Principle 7 – Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purposes such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.*

- One Manchester will only allow access to images as outlined under principle 5.

4.8 *Principle 8 - Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.*

- One Manchester does not operate a live surveillance camera system, which requires monitoring. The system in place whether Overt or Covert is used to capture images and these images reviewed if a breach occurs as outlined in Principle 1.
- Therefore, One Manchester officers do not need to be trained to an approved operational, technical and competency standard; however the designated individuals will be trained to comply with the policy, procedures in use and accessing the systems and retaining images.

4.9 *Principle 9 - Surveillance camera system images and information should be subject to appropriate security measures, to safeguard against unauthorised access and use.*

- A process will be in place that will only allow trained and permitted individuals to access and download footage once permission has been granted by one of the appointed managers.
- One Manchester's overt permanent CCTV will be password protected for access.

4.10 *Principle 10 - There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.*

- The continued use of CCTV at One Manchester will be reviewed on a regular basis and it is deemed unnecessary it will be removed. This will include confirming the present location of the cameras is appropriate.
- A review of the system will take in to account other possible alternative interventions that may be more appropriate than using CCTV.

4.11 *Principle 11 - When the use of a surveillance camera system is in pursuit of a legitimate aim and a pressing need, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information for evidential value.*

- One Manchester will continue to review its systems to ensure they will if necessary offer an appropriate level for evidential value to the criminal justice system.

4.12 *Principle 12 - Any information used to support a surveillance camera system, which matches against a reference database for matching purposes should be accurate and kept up to date.*

- This principle does not apply for One Manchester as we do not utilise CCTV systems to match against any reference databases including but not limited to those associated with Auto Number Plate, facial or other biometric recognition systems.

5.0 Method and Approach

This policy should be read in conjunction with any procedures, guidance notes and documentation prepared to meet and support its aims.

6.0 Responsibility

The Information Risk and Security Group (IRSG) will be responsible for ensuring that this policy complies with legislative requirements.

One Manchester Staff are responsible for the operation of the video image recording systems and for implementing this policy.

7.0 Equality and Diversity

One Manchester will ensure that this policy is applied fairly to all our customers. We will not directly or indirectly discriminate against any person or group of people because of their race, religion, gender, marital status, sexual orientation, disability or other grounds set out in our Equality, Diversity and Inclusion Policy.

An Equality Impact Assessment has been carried out on this policy.

8.0 Monitoring, review and evaluation

This policy will be updated as required with changes in legislation or working practices and a full review will be completed every three years.

The One Manchester Data Protection Officer will be responsible for reviewing and evaluating this policy.

9.0 Legislation and Link to other Documents

This policy and any subsequent procedures have been written in accordance with relevant guidance and legislation, which includes:

- Data Protection Act 2018;
- Protection of Freedom Act 2012;

- The Human Rights Act 1998;
- The Freedom of Information Act 2000;
- Information Commissioners Office;
- Surveillance Camera Code of Practice Pursuant to Section 29 of the Protection of Freedoms Act 2012;
- Private Security Industry Act 2001;
- OM Neighbourhood Management Policy;
- OM ASB and Hate Crime Policy;
- OM Adult and Child Safeguarding Policies.