

ALBYN GROUP CCTV POLICY

Policy Owner	Alli Vass
Policy Sponsor	Maureen Knight

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Corporate Fit	
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Risk Register	✓
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Regulatory Standards	✓
Equalities Strategy	
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1. INTRODUCTION

1.1 Albyn Group aims to incorporate our Purpose, Mission, Values and Vision into our policies and decision making. With that in mind, we aim to follow our guiding principles that apply to all policies:

<https://www.albynhousing.org.uk/about-us-2019/our-history/>

1.2 Albyn Group owns and operates CCTV surveillance systems at various premises including offices and residential properties. We do this for the purpose of enhancing security where we consider there to be a risk of crime or a potential threat to the health, safety, and wellbeing of individuals; and to assist in the prevention and detection of criminal or anti-social behaviour.

1.3 The Albyn Group acknowledges the obligations it incurs in operating such systems and the rights and freedoms of those whose images may be captured. We are committed to operating them fairly and within the law at all times and in particular will comply with the requirements of UK GDPR and the UK Data Protection Act 2018.

2. DEFINITIONS

2.1 **Albyn Group:** Throughout this policy Albyn Group means Albyn Housing Society and its subsidiary companies.

2.2 **Data Controller:** Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the way any personal data are, or are to be, processed.

2.3 **Data Processor:** Data processor in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

2.4 **UK Data Protection Law:** Data Protection Act 2018 and UK GDPR.

3. SCOPE

3.1 This policy applies to all employees who are responsible for procuring, contracting and or managing the implementation of CCTV surveillance systems. This includes the operational maintenance contracts for the systems and anyone operating systems either on an active day-by-day basis or purely for the purposes of reviewing and retrieving recorded activity, on those systems.

3.2 It covers all Albyn Group properties where CCTV surveillance systems are already implemented and on sites where surveillance systems are proposed for implementation.

4. RELATED POLICIES

4.1 Related policies include but are not limited to:

- Data Protection Policy
- ASB Policy
- Health & Safety Policy Statement

5. ROLES AND RESPONSIBILITIES

- 5.1 The Chief Executive has overall responsibility for health and safety at Albyn Group.
- 5.2 The Customer Services Director has responsibility for the CCTV surveillance systems used for Albyn Housing Society properties and offices
- 5.3 The Director of Assets & Subsidiaries has responsibility for CCTV surveillance systems used for subsidiary properties.
- 5.4 All employees who are involved in the procurement and or maintenance of surveillance systems will ensure this policy is communicated to any potential or actual supplier.

6. POLICY STATEMENT

6.1 Albyn Group will only use overt CCTV surveillance. The following are considered to be permitted reasons for using CCTV surveillance:

- Prevention and detection of anti-social and criminal behaviour or other actions which breach tenancy or occupancy agreements by residents of, or visitors to, residential properties
- Prevention and detection of unacceptable behaviour, including aggressive or abusive actions, towards staff in office premises
- Prevention and detection of unauthorised access to, or other criminal activity within, office premises
- General compliance with relevant legal obligations, regulatory requirements and Group policies and procedures.

6.2 Managing the System

- 6.2.1 Albyn Group will engage the services of a specialist contractor to manage the installation and maintenance of CCTV surveillance equipment, and the operation of CCTV surveillance systems.
- 6.2.2 All contractors will hold a Security Industry Authority (SIA) licence in accordance with the provisions of the Private Security Industry Act 2001. A SIA licence will be required for all licensable activities.
- 6.2.3 Suppliers and contractors must comply with UK Data Protection Law where they are implementing, operating, or managing CCTV systems on behalf of Albyn. The Albyn Group will have in place a written Data Processing Agreement with these contractors which clearly defines obligations, responsibilities, and liabilities.
- 6.2.4 The Albyn Group will maintain a register of all system installations, detailing location and installation date, relevant technical specifications, and system design features.

6.3 System Specification and Installation

- 6.3.1 Before installing CCTV, Albyn will:
 - Consider other options, for example improving lighting or upgrading security.
 - Complete a Data Protection Impact assessment to assess the potential impact in people's right to privacy and the availability of alternative less intrusive options.

6.3.2 The Albyn Group will site CCTV surveillance systems in accordance recommended practices that incorporates privacy by design features. Relevant criteria will include, but not be limited to:

- Ensuring personal data can be easily located and extracted.
- Ensuring images are of an appropriate quality, relevant to their purpose.
- Ensuring that the date and time images are captured is easily identifiable.
- Ensuring that unnecessary images are not viewed or recorded.
- Installing image only systems, which have no sound recording capability, as standard.
- Siting cameras to ensure only areas of interest are subject to surveillance and to minimise viewing areas not relevant to the purposes the system was installed for, with due regard given to planning permission requirements as necessary.
- Siting cameras and equipment in secure locations, protected from unauthorised access and possible vandalism.

6.3.3 If we think it's appropriate to install CCTV surveillance on estates or in communal areas, we will write to our customers to confirm:

- The purpose of the CCTV installation.
- The appropriate controls in place to keep the CCTV data secure.
- Whether it's a temporary or permanent installation.
- Whether there's a cost recoverable from their service charges for the CCTV. We'll consult residents, where required under section 20 of the Landlord and Tenant Act 1985.
- That a Data Protection Impact Assessment has been completed.
- How they can exercise their rights under UK Data Protection Law (as detailed within Customer Privacy Notice).

6.4 Access and Use of images

6.4.1 Access to images will be strictly controlled. Appropriate security measures will be in place to ensure entry to physical locations where image data is stored is limited to authorised personnel. Generally, such authorised personnel will be individuals appointed by the Albyn Group's CCTV contractors, acting under explicit instruction. The Albyn Group will have a Data Processing Agreement in place with CCTV contractors which clearly defines obligations, responsibilities, and liabilities.

6.4.2 CCTV contractors will be responsible for setting and maintaining relevant technical security controls for each CCTV system, including passwords or access codes and for maintaining physical and digital access logs.

6.4.3 Access to images may also be required to respond to a Subject Access Request (SAR). All requests for system footage by individuals will be treated as SARs and handled in line with the Albyn Group SAR Procedures. In doing so the Albyn Group acknowledges the requirement to balance the rights of data subjects against those of other individuals who appear in the requested images

6.4.4 A protocol will be in place between the Albyn Group and its CCTV contractors to govern the process for requesting copies of images and their subsequent release, storage, transportation, and destruction. This shall ensure appropriate levels of authorisation and security standards are maintained.

6.4.5 Disclosure of information from systems will be controlled and consistent with the purpose(s) for which the system was installed. As such disclosure is likely to be limited to law enforcement agencies or the Albyn Group's legal advisers.

6.4.6 The Group considers any attempted or actual misuse of CCTV or other surveillance systems or images by staff members to be a disciplinary matter, which will be handled in accordance with the relevant policy and procedures.

6.5 Retaining and Erasing Images

6.5.1 CCTV images will be deleted after a maximum of 31 days unless the information relates to an ongoing investigation or legal case. Where this is the case, the images will be deleted within three months of closing the ASB case or any legal proceedings concluding.

6.6 Reviewing CCTV Installations

6.6.1 Albyn Group will instruct its contractors to undertake periodic maintenance and security checks of CCTV systems. Any works to repair or replace system components, or to amend system configuration or design will be carried out only under explicit instruction.

6.6.2 All CCTV systems will be reviewed regularly by Albyn Group to ensure that they continue to serve a legitimate purpose and are required. This will involve a review and update of the DPIA as necessary to reflect changes or actions required.

6.6.3 Where it is determined that a system is no longer needed, arrangements for decommissioning will be made promptly. This will involve removal of all cameras and associated equipment and signage.

6.7 Customer CCTV & Camera Doorbells

6.7.1 Customers must contact Albyn Group before they install CCTV or a camera doorbell. They should consider other solutions first, for example, security lighting or neighbourhood watch schemes.

6.7.2 Customers will be able to install and operate CCTV, or a camera doorbell, if they:

- Comply with the law. When they contact Albyn Group, they will be directed to information about the law that must be followed and relevant guidance from the Information Commissioner's Office.
- Cover just their property and not their neighbour's property or any communal areas. This means customer are not able to have CCTV if they live in a flat with a shared entrance.
- Have a doorbell which does not record or save footage. If they live in a flat with a shared entrance, they can have a camera doorbell with a live video stream only.
- Make good if you cause any damage when installing or removing it. If installation will cause any disruption to the property e.g., by using the electricity supply customers will need to request permission.
- Do not compromise fire safety (e.g., damage fire doors including flat entrance doors).

7. POLICY REVIEW

7.1 This policy will be reviewed in three years or sooner if required.