



CCTV Code of Practice

Approved on: 3rd May 2016
Senior Management Team

Effective from: 25th July 2016



HAPPY TO TRANSLATE

Bield Housing & Care, 79 Hopetoun Street, Edinburgh, EH7 4QF
Scottish Charity SC006878

Introduction

Bield Housing & Care owns and operates image only CCTV surveillance systems across a large number of our properties.

Using CCTV can be privacy intrusive, as it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day activities. This Code of Practice has been written to explain how Bield will operate CCTV and the information recorded from it, to ensure privacy is considered while creating a safer environment for employees, customers and visitors to Bield.

In operating CCTV systems Bield will:

- Comply with the Data Protection Act (1998) and other relevant obligations such as the implications of the European Convention on Human Rights, Article 8 (the right to respect for private and family life, home and correspondence).
- Ensure appropriate installation and operation of CCTV systems
- Ensure information captured is usable and meets the purposes installed for
- Ensure individuals who may be captured in images are reassured that their privacy is being respected and information handled appropriately

CCTV systems will not be installed simply because they can; they are affordable or have customer support. Careful consideration will be taken into whether CCTV surveillance is required, ensuring all alternative options have been investigated prior to commencing the use of CCTV.

Purpose of CCTV

CCTV systems are installed and operated by Bield for the following purposes:

- to enhance the security of our properties;
- to assist in the prevention and detection of crime;
- to provide a sense of security to employees and customers;
- to provide out of hours and emergency safety via BR24 for main entrances and lifts

CCTV Surveillance System

Bield operate two types of CCTV surveillance systems; image only CCTV from fixed location cameras and live capture for emergency lift calls and main door enter systems.

The CCTV systems operate throughout the year, 24 hours a day.

Data Protection

For the purposes of the Data Protection Act (1998) (DPA), Bield Housing & Care are the data controller and are legally responsible for the management and maintenance of the CCTV systems installed and operated in our properties. Bield is registered with the ICO as a data controller for the use of CCTV for the purpose of security and the prevention and detection of crime.

Bield will operate CCTV systems and handle any recorded images in accordance with Bield's Data Protection Policy and Procedures.

Subject Access Requests

The DPA gives individuals the right to find out what personal data we hold about them and this includes requesting to view or be provided with a copy of CCTV footage that they may appear in. This is commonly known as subject access, and individuals may exercise the right by making a written request for the information held about them.

All requests for CCTV footage by individuals will be treated as subject access requests and will be handled in line with Bield's Data Protection Policy and Procedures.

Privacy

Privacy Impact Assessments

Due to the ability of CCTV to invade individual's physical and informational privacy, Privacy Impact Assessments will be completed; annually for each development; for each new installation; renewal or alteration to usage. E.g. change in camera position or addition of cameras.

Consultation

Customers will be consulted on the use of CCTV before any surveillance systems are installed or if changes are made to the system or camera positions that may affect their privacy.

Signage

Appropriate and clear signage will be in place to make everyone aware where CCTV is in operation and who to contact regarding any queries about the CCTV system.

Technical Specification

The CCTV systems will be of the technical specification to ensure appropriate quality of images and that unnecessary images are not viewed or recorded.

CCTV systems will have an accurate date and time set and be checked regularly.

Location of Cameras

BR24 Live capture systems cameras will be situated at the main entrance of the property and in the lifts. These cameras are to provide out of hours safety and security and do not record images continuously.

Permanent fixed location cameras (and temporary mobile cameras) will be sited to ensure only areas of interest are subject to surveillance and to minimise viewing areas not relevant to the purposes the CCTV was installed for. They will be prevented from focusing on individuals' property.

Cameras will be sited to ensure that they can produce quality images taking into account the environment where located e.g. lighting, trees.

Cameras will be located in secure locations where protected from vandalism.

Use of CCTV System

Procedures

Bield will maintain clear procedures on the operation of CCTV for all employees who require access to CCTV systems.

Training

All employees who require to use CCTV systems will be trained in respect of all functions, operational and administrative arising within the CCTV system operation.

Access to CCTV systems

All CCTV equipment will be located in secure and restricted offices with any CCTV monitors switched off. Access is strictly limited to relevant employees and CCTV Contractors.

All access to equipment and images will be recorded in each property's CCTV log.

Recording / Storage of Images

BR24 live capture allows real time access to the camera images. These are only accessed when the main door or lift call are activated. Images are not recorded. Snapshots can be captured for evidence, if required, and are stored securely within the BR24 call handling system.

CCTV images are recorded on a digital hard drive and accessed only when an incident has been reported that requires the images to be viewed. No images from CCTV cameras are actively monitored, with the exception of in emergency situations.

Copies of Recorded Images

Copies of recorded images will only be made when required for investigation or disclosure in relation to the purposes the CCTV was installed for. Copies are encrypted on DVD or USB

Memory Sticks and are stored and transported securely. Once the images are no longer required they are disposed of securely.

Retention

CCTV images will be retained only for as long as necessary to fulfil the required purpose and in accordance with Bield's retention schedules and CCTV Procedures.

Disclosing CCTV Images

Disclosure of information from the CCTV systems will be controlled and consistent with the purpose(s) for which the system was installed following the CCTV Procedures. Images will only be disclosed to relevant third parties e.g. Police Scotland, Care Inspectorate.

A register of CCTV disclosure and non-disclosure will be maintained by Bield's Information Management Officer.

Misuse of CCTV systems or images

Any misuse of Bield CCTV systems or images by employees will be treated seriously by Bield and may be considered under disciplinary procedures.

Complaints

If an individual wishes to make a formal complaint about Bield's compliance with this Code, it should be made via the Bield's Complaints Handling Procedure.

Individuals also have the right to complain to the Information Commissioner if they feel Bield are not operating CCTV in accordance with the Data Protection Act (1998).

<https://ico.org.uk/>

Equality and Diversity

In operating this Code of Practice, Bield seeks to achieve equality of opportunity and will not discriminate against anyone on grounds of age; disability; gender re-assignment; pregnancy and maternity; race, including ethnic or national origin, colour and nationality; religion or belief; sex and sexual orientation.

Contact

Information Management Officer

AccessToInfo@bield.co.uk

T: 0131 273 4000

Review

A review of this Code will be conducted every three years.