

CCTV Policy

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1.0 PURPOSE

- 1.1 The purpose of this policy is to outline the way in which Two Rivers Housing uses Closed Circuit Television (CCTV).
- 1.2 This policy covers Two Rivers' use of the Closed-Circuit Television (CCTV), either permanent, fixed systems or redeployable systems.
- 1.3 CCTV is a surveillance system that comprises cameras, recorders and viewing screens. We use digital recorders and 'network cameras' that provide greater installation flexibility.
- 1.4 CCTV systems may be used by Two Rivers Housing to:
 - Monitor the security of our premises and assets
 - Prevent and detection of crime
 - Investigate alleged breaches of tenancy
 - Work in partnership with tenants and agencies concerned with community safety to provide reassurance and reduce anti-social behaviour within our communities
 - Work with police, local authorities and other partnership organisations to identify and take appropriate action against perpetrators of crime, anti-social behaviour or breaches of tenancy.
- 1.5 CCTV cameras may be placed in:
 - Stairways
 - Lifts and entrances
 - Communal areas
 - Public places
 - Car parks
 - The carpark and entrance at our offices, Rivers Meet
- 1.6 Two Rivers Housing will operate its CCTV systems in accordance with Data Protection Legislation. This policy outlines how we meet legislative requirements in the installation of CCTV and how we deploy, manage our overt CCTV systems (Overt surveillance is openly carried out with clear signage).

2.0 IMPACT ON PRIVACY OF INDIVIDUALS

- 2.1 Privacy is to be maintained by a proportionate response to the problem, regularly evaluating whether CCTV is necessary and proportionate in its continuous use.
- 2.2 A Privacy Impact Assessment (PIA) must be completed before the installation of a new CCTV system. A PIA must be kept up to date and accurate.
- 2.3 We will only use overt cameras. We will not use covert cameras (i.e. cameras hidden from view or focused on private areas)
- 2.4 CCTV will usually be passively monitored – this means CCTV footage is reviewed after an event for specific purposes (i.e. not viewed in real time or live).

3.0 ACCESS TO IMAGES

- 3.1 Only nominated persons will have access to images (either live or stored).
- 3.2 The CCTV register must be completed each time footage is accessed or reviewed by the authorised person.
- 3.3 Footage and stills will only be stored for as long as they are needed.
- 3.4 Footage captured by the system will be retained for a maximum of 28 days except where they are required to assist with complaint investigations, prosecutions or to complete a Subject Access Request.
- 3.5 On some occasions CCTV footage may be viewed on a Two Rivers Housing mobile phone or tablet. However, the footage will not be stored on the device at any time.
- 3.6 CCTV monitors will not be placed where members of the public or customers can see them.
- 3.7 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and where we have a lawful basis to share. CCTV footage may be shared with third parties including:
 - Law enforcement agencies where footage or images may assist with the prevention or detection of crime.
 - Prosecution agencies.

- Relevant legal representatives.
- The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime, in consultation with the Police or Community Safety Partnership.
- Data Subjects and their authorised third parties as part of a Subject Access Request where an exemption does not apply.

3.8 Footage and images will only be downloaded and stored where we have a lawful basis for doing so. The authorised person downloading and storing the image is responsible for determining this before downloading the footage.

4.0 SUBJECT ACCESS REQUESTS

4.1 Under the UK General Data Protection Regulations (GDPR) 2018, individuals have a right to request a copy of their personal data, this includes CCTV footage and images of them providing the data has not been deleted or an exemption prevents us from providing this.

4.2 To exercise their right, customer or members of the public can submit a Subject Access Request via telephone, email, letter or via social media. Individuals do not need to use specific words or reference data protection legislation.

4.3 Staff are responsible for ensuring they identify a Subject Access Request and pass this onto the Information Governance Officer, or the Data Protection Officer in their absence within one working day. Once received the request will be reviewed and the Information Governance Officer will contact the Data Subject.

4.4 Subject Access Request must be completed within one month, unless there is a valid reason for extending the timescales.

4.5 Two Rivers has a documented SAR procedure, please refer to the iGov SAR Procedure document.

5.0 IMPLEMENTATION

5.1 All members of staff are responsible for ensuring they are aware of their responsibilities and the procedures regarding the use of CCTV.

5.2 The Head of Safer Neighbourhoods is responsible for ensuring that this policy is communicated and implemented.

- 5.3 It is the responsibility of all of Two Rivers Housing employees to ensure that their work is carried out in line with this policy and the procedures attached to it.
- 5.4 Two Rivers will ensure that all of its employees are aware of the policy.
- 5.5 Two Rivers will ensure that this policy and the procedures attached to it are implemented in accordance with our Equality and Diversity Policy.
- 5.6 Two Rivers will ensure that this policy and the procedures attached to it are implemented in accordance with our Customer Care Policy.
- 5.7 Two Rivers will ensure that this policy and procedures attached to it are implemented in accordance with our IT Policy.

6.0 MONITORING

- 7.1 The Head of Safer Neighbourhoods is responsible for monitoring this policy to ensure that it is correctly applied.
- 7.2 Two Rivers will regularly review the information that is held on its records to ensure that actions that have been taken are reasonable and consistent and in line with this policy.

7.0. REVIEW

- 7.1 The Head of Safer Neighbourhoods will be responsible for ensuring that reviews of this policy are carried out.
- 7.2 Two Rivers will undertake a review of this policy whenever there are relevant changes to legislation, case law or good practice that may impact on it.
- 7.3 In the absence of any other trigger for a review, the policy will be reviewed at three yearly intervals or such other period as the Two Rivers Group Board may from time to time determine.
- 7.4 The controlled procedures relating to this policy will be maintained and periodically reviewed, considering any operational issues that arise or changes to legislation, case law or good practice.

8.0 RELATED POLICIES, PROCEDURES AND OTHER DOCUMENTS

- IT Policy
- Anti-Social Behaviour Policy
- Privacy Policy
- iGov SAR Procedure
- Customer Care Policy
- Equality and Diversity Policy
- Guidance on the use of domestic CCTV and video doorbells
- Guidance on tenant supplied recordings

10.0 LEGAL AND REGULATORY FRAMEWORK

- Data Protection Act 1998
- General Data Protection Regulation (GDPR) 2018
- Human Rights Act 1998
- Homes and Community Agency Regulatory Standards
- Protection of Freedoms Act 2012
- Information Commissioner Office – CCTV Code of Practice
- Home Office – Surveillance Camera Code of Practice 2013

10.1 We are not subject to the Regulation of Investigatory Powers Act 2000. A procedure for the use of CCTV can be found on the website and any complaints of CCTV will be followed up through the Two Rivers complaints procedure.