



## **CCTV POLICY STATEMENT August 2017.**

### 1.0 Owner

1.1 James Andrew Residential LTD has in place across various sites within their management portfolio CCTV surveillance systems, "the system". Images are monitored and recorded on-site, both on un-manned & manned sites and will be used in strict accordance with this policy. The system is managed by James Andrew Residential Ltd.

1.2 The Director of Residential Estates and the Head of Estates are jointly responsible for the operation of the system and for ensuring compliance with this policy and the procedures documented in the Procedures Manual. They may be contacted as follows:

Director of Estates:      Fiona Docherty  
   James Andrew Residential.  
   Fairchild House  
   Redbourne Avenue  
   London N3 2BP

Head of Estates:            Corin Jenkins  
   James Andrew Residential.  
   Fairchild House  
   Redbourne Avenue  
   London N3 2BP

### **Data Protection Act 1998:**

CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. This Policy is associated with the James Andrew Residential LTD Data Protection Policy, the provisions of which should be adhered to at all times.

The company Data Protection Officer, who is responsible for the Data Protection Policy, is: Kirsty Ridout. PA,

James Andrew Residential Ltd. Fairchild House Redbourne Avenue  
London N3 2BP



## 2.0 The system

2.1 The system comprises: Fixed position cameras; Pan Tilt and Zoom cameras; Monitors; Multiplexers; digital recorders; Public information signs.

2.2 Cameras will be located at strategic points on the estates, principally at entrances and exit points of the estate and buildings. No camera will be hidden from view and all will be prevented from focussing on the frontages or internal areas of private residential apartments.

2.3 Signs will be placed at strategic points and at entrance and exit points of the estate to inform staff, residents, visitors and members of the public that a CCTV system is in use.

2.4 Although every effort has been made to ensure maximum effectiveness of the system it is not possible to guarantee that the system will detect every incident taking place within the estate or any area of coverage.

## 3.0 Purpose of the system

3.1 The systems have been installed by various parties and are managed by James Andrew Residential Ltd with the primary purpose of reducing the threat of crime generally, protecting all premises and helping to ensure the safety of all staff, residents and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:

- Deter those having criminal intent
- Assist in the prevention and detection of crime
- Facilitate the identification, apprehension and prosecution of offenders in relation to nuisance, crime and public order.
- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to investigators, managers and any external advisors.
- Facilitate the safe and free movement of traffic on the estate.
- Support staff in the event of a fire or similar major incident on the estate.

The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in accordance with the policy on covert recording.
- For any automated decision taking

## 3.2 Covert recording

3.2.1 Covert cameras may be used under the following circumstances on the written authorisation or consent of the Director of Estates or Head of Estates and their use must be justifiable and proportionate. Covert camera installation should meet the following criteria:-

- That informing the suspects or individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised, anti-social or illegal activity is taking place or is about to take place.
- That the use of the camera(s) is in the interests of the safety and welfare of staff, residents and visitors.

3.2.2 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.

3.2.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

## 4.0 The Estate Security Control Room (FCC).

4.1 Images captured by the system will be monitored and recorded in a controlled environment, twenty-four hours a day throughout the whole year. Monitors are not visible in normal circumstance.

4.2 No unauthorised access to the system will be permitted at any time. Access will be strictly limited to the duty controllers, authorised members of senior management, police officers and any other person with statutory powers of entry. A list of those members of senior management or staff authorised to access the Control Room is given at **Appendix 1**.

4.3 Staff, residents and visitors may be granted access to the system on a case-by-case basis but strictly on prior authorisation of the Director of Estates. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason.

4.4 Before allowing access to the system, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the system.



## 5.0 System Administration and Procedures

5.1 Details of the administrative procedures which apply to the Control Room will be set out in a Procedures Manual, a copy of which is available for inspection by prior arrangement, stating the reasons for the request.

5.2 Images of identifiable living individuals are subject to the provisions of the Data Protection Act 1998; the system Operator on duty is responsible for ensuring day to day compliance with the Act. All recordings will be handled in strict accordance with this policy and the procedures set out in the Procedures Manual. The recording equipment is kept securely in a security controlled room.

## 6.0 Staff

6.1 All staff working on the Estates will be made aware of the sensitivity of handling CCTV images and recordings. The site management will ensure that all staff are fully briefed and monitored in respect of the functions, operational and administration arising from the use of CCTV.

6.2 Training in the requirements of the Data Protection Act 1998 will be given to all those required to work on the system.

## 7.0 Recording

7.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.

7.2 Images will normally be retained for between fifteen days to 31 days from the date of recording, and then automatically overwritten. Once a hard drive has reached the end of its use it will be erased prior to disposal and a record made of the removal from operation.

7.3 All hard drives and recorders shall remain the responsibility of James Andrew Residential Ltd during site management or until disposal and destruction.

## 8.0 Access to images

8.1 All access to images will be recorded and an appropriate access request form completed. We have separate forms for Police requests and staff or public requests.

8.2 Access to images will be restricted to those staff that need to have access in accordance with the purposes of the system.

### 8.3.0 Access to images by third parties

8.3.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- 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
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

8.4.0 Access to images by a subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. Anyone who believes that they have been filmed by C.C.T.V. is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access.

8.4.1 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data Protection Officer. Subject Access Request Forms are obtainable from the Estate Office, between the hours of 0900 to 1700 Monday to Friday.

8.4.2 The Data Protection Officer will then arrange for a copy of the data to be made and given to the applicant. The applicant must not ask any member of staff to show them the data, or ask anyone else for a copy of the data. All communications must go through the appointed Data Protection Officer. A response will be provided promptly and in any event within forty days of receiving the required fee and information. Those authorised to access the system for the purpose of review or downloading are listed in **Appendix 2**.

8.4.3 The Data Protection Act gives the Data Protection Officer the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

8.4.4 All such requests will be referred to the Estate management by the Data Protection Officer.

8.4.5 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

9.0 Request to prevent processing



9.1 An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage or distress to that or another individual.

9.2 All such requests should be addressed in the first instance to the Data Protection Officer, who will provide a written response within 21 days of receiving the request setting out their decision on the request. A copy of the request and response will be retained.

## 10.0 Complaints

10.1 It is recognised that staff, residents or public may have concerns or complaints about the operation of the system. Any complaint should be addressed in the first instant to the Data Protection Officer. The right to complain does not alter the existing rights of staff under any relevant grievance or disciplinary procedures.

## 11.0 Compliance monitoring

11.1 The contact point for staff or members of the public wishing to enquire about the system will be the Data Controller James Andrew Residential.  
Fairchild House, Redbourne Avenue, London N3 2BP

11.2 Upon request enquirers will be provided with:

A summary of this statement of policy

An access request form if required or requested

A subject access request form if required or requested

Details of who to write to in the event of a complaint.

11.3 All documented procedures will be kept under review.

11.4 The effectiveness of the system in meeting its purposes will be kept under review by Ballymore Asset Management on behalf of Ballymore Wapping Ltd.

## **Appendix 1**

Authorised access to the system.

Other than site based personnel the following have authorised access to the system. All persons must sign in and out and state the purpose of the visit.

Director of Estates

Head of Estates.

Compliance Manager

Property Manager

Authorised Estate or CCTV system engineers.