



Closed-Circuit Television (CCTV) Policy

1. Introduction

- 1.1 This policy must be read in conjunction with the Salvation Army Homes CCTV Procedure and associated appendices.
- 1.2 Salvation Army Homes uses CCTV images to help provide a safe and secure environment for residents, staff, volunteers, contractors and visitors, and to help protect its property.
- 1.3 This policy sets out the accepted use and management of Salvation Army Homes' CCTV equipment and images, ensuring it complies with the UK General Data Protection Regulation (GDPR)¹, the Human Rights Act 1998 and other legislation (referred to together in this policy as "the Legislation").
- 1.4 Where, in this policy, there is reference to the Legislation, this includes all statutory amendments and subordinate legislation and regulations.
- 1.5 Salvation Army Homes has produced this policy in line with the ICO CCTV guidance and the UK General Data Protection Regulation (GDPR).

2. Scope

- 2.1 This policy applies to all staff, volunteers, residents, contractors and the general public who may be in or around properties, premises and car parks owned or managed by Salvation Army Homes.
- 2.2 Managers must ensure that relevant teams understand and comply with this policy.
- 2.3 CCTV (closed-circuit television): a system that sends television signals to a limited number of screens, and is often used in shops and public places to prevent crime.

¹ References to the GDPR in this Policy mean the UK GDPR as varied or supplemented by the Data Protection Act 2018

3. Aims

3.1 This policy aims:

- 3.1.1 To give clear guidelines to staff on the operation of Salvation Army Homes' CCTV systems.
- 3.1.2 To ensure compliance with the UK GDPR.
- 3.1.3 To provide guidance to staff and contractors when installing CCTV.
- 3.1.4 To outline Salvation Army Homes' policy in respect of residents' personal CCTV installations.

4. Policy Statement

4.1 Purposes of CCTV

- 4.1.1 Salvation Army Homes may utilise CCTV within and around its properties to:
 - Help provide a safe and secure environment for residents, staff, volunteers, contractors and visitors;
 - Help protect its property and prevent crime;
 - Carry out covert monitoring under certain (limited) circumstances (see 4.8 Covert Recording).

4.2 Data Protection Impact Assessment

- 4.2.1 Before installing a CCTV system, a Data Protection Privacy Impact Assessment must be carried out to identify any potential risks in relation to Salvation Army Homes' use of CCTV and approach and to comply with GDPR Legislation. This must be reviewed annually.

4.3 CCTV Equipment and Siting

- 4.3.1 Any equipment selected for the CCTV system will be appropriate to satisfy the purposes set out in this policy and the siting of any cameras will be completed in compliance with the Legislation.

4.4 CCTV Signage

- 4.4.1 Salvation Army Homes will notify all individuals including employees, contractors, residents and the general public if they are in an area where CCTV surveillance is being carried out and this will be achieved through the use of prominent signs. It is also recommended that CCTV signage has a braille option for those with impaired vision.

4.5 Storing Images

- 4.5.1 Salvation Army Homes has an obligation to keep CCTV images secure at all times so as to prevent unauthorised viewing or disclosure. CCTV images will be stored on a secure medium and in a secure place, to which access is controlled. The Association will maintain the integrity of all images whilst they remain in its possession.

4.6 Viewing Images

- 4.6.1 The mere act of viewing is a processing activity that is subject to the UK GDPR regulations. CCTV images will only be viewed and accessed by authorised members of staff as identified in the Local Scheme CCTV Checklist (Appendix 3 CCTV Procedure). Other staff and third parties (such as the police), will only be allowed to view the images where it is necessary in connection with the purposes set out in this policy.

4.7 CCTV Retention

- 4.7.1 CCTV images held on the hard drive of a PC or server will be overwritten on a recycling basis once the drive is full, and in any event will not be held for more than 30 days, except where they need to be retained longer for evidential purposes.

4.8 Disclosure of Images

- 4.8.1 In certain circumstances it may be necessary to disclose the CCTV images to a third party, such as the police. Disclosures to third parties must be consistent with the purposes set out in this policy and the CCTV Procedure.
- 4.8.2 Any disclosure of images must be approved by the relevant Manager, following notification to the DPO team.
- 4.8.3 In all circumstances a record should be kept by the relevant Manager of all requests for disclosure of CCTV images, together with any reasons for refusing a request.

4.9 Processors

- 4.9.1 Any third party appointed on behalf of the Association to collect information about individuals will be a “processor”. For example, the Association may hire an external organisation to maintain its CCTV system, edit images on its behalf (i.e. manually editing out images of third persons if any data subjects request a copy of the footage), or carry out covert monitoring under certain (limited) circumstances. If a third party is appointed on behalf of the Association to collect information about individuals, Salvation Army Homes will ensure the appropriate data sharing agreement is adhered to.

4.10 Individual Access Rights by Data Subjects

- 4.10.1 The UK GDPR gives individuals (data subjects) the right to access personal information about themselves, including CCTV images.
- 4.10.2 All requests for access to images by data subjects (when they are asking for access to images of themselves), must be treated as a subject access request and reported to the Data Protection Office (DPO).
- 4.10.3 It can be difficult to locate specific CCTV images, and requests for access must include sufficient information to enable Salvation Army Homes to identify:
- The date and time when the images were recorded;

- The location of the CCTV camera;
- Further information to identify the individual, if necessary.

4.10.4 Decisions regarding the disclosure of information following a request from a data subject will be made and communicated to the requester in accordance with Salvation Army Homes' Subject Access Request Response Procedure.

4.11 Resident CCTV Installation

4.11.1 Salvation Army Homes residents have the right to protect their property and this can be done by installing a personal CCTV system, subject to Salvation Army Homes permission prior to installation.

4.11.2 If the system camera captures images outside the boundaries of the resident's household, then UK GDPR and the Data Protection Act 2018 will apply and the resident will need to ensure the use of CCTV complies with these laws.

4.11.3 The Information Commissioner's Office website provides more information about domestic cameras covering areas other than a person's own property <https://ico.org.uk/for-the-public/domestic-cctv-systems/>

4.12 Roles and Responsibilities

4.12.1 This policy must be read in conjunction with the CCTV Procedure and associated appendices.

4.12.2 The relevant Manager will carry out an annual review to evaluate whether it is necessary and proportionate to continue using a CCTV system within a Salvation Army Homes property, in line with this policy and the Legislation, using the DPIA Assessment (Appendix 4).

4.12.3 All schemes with CCTV must hold a localised procedure. (Appendix 3 CCTV Procedure).

5. Data Protection and Equality Impact

In developing this policy we have carried out assessments to ensure that we have considered:

- Equality, Diversity and Inclusion
- Privacy and Data Protection

To request a copy of these full assessments, please contact the Business Assurance Team at business.assurance@salvationarmyhomes.org.uk.

6. Further information

If you have any questions regarding this policy, please contact your line manager or the Business Assurance Team at business.assurance@salvationarmyhomes.org.uk, who will direct your query to the relevant Policy owner.

Legislative and Regulatory Framework

The following legislation, regulatory standards and documents can be relied upon to inform this policy.

Legal Framework	Regulatory Standard	Other documents
Data Protection Act 2018		Data Protection Policy
UK General Data Protection Regulation (GDPR)		Subject Access Request Response Procedure
ICO CCTV Guidance https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/		CCTV Procedure Scheme-specific localised CCTV procedures Guidance on resident responsibilities in the use of CCTV and Video Doorbells

Document History Log

Lead Reviewer	Date			Version	Approval	
	Created:	Revised:	Expiry		By	Date
HoPCS	August 2020		October 2023	1.0	SMT	21/10/2020
BAM	Minor update to Section 10		October 2023	1.1	n/a	
DPO		July 2024	August 2027	1.2	SMT	22/08/2024

Equality Impact Assessment Summary			
Protected characteristic	Impact (Positive, negative, neutral)	Protected characteristic	Impact (Positive, negative, neutral)
Age	Neutral	Disability	Neutral
Sex	Neutral	Race	Neutral
Religion of belief	Neutral	Sexual orientation	Neutral
Gender reassignment	Neutral	Pregnancy / maternity	Neutral
Marriage / civil partnership	Neutral		