



Belmont House, 57 Belmont Road, Cambuslang, G72 8PG
www.wwhc.org.uk E: enquiries@wwhc.org.uk T: 0141 641 8628

Policy Name	CCTV Systems Policy
Policy Author	Data Protection Officer
Approved by Sub Committee	N/A
Approved by Management Committee	September 2025
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West Whitlawburn Housing Co-operative will provide this policy on request at no cost, in larger print, in Braille, in audio or other non-written format, and in a variety of languages. Please contact the office.

1. **Introduction**

- 1.1 WWHC owns and operates CCTV systems at various locations within its office and properties (including multi-storey blocks and the Concierge Station) and external areas owned by WWHC. WWHC recognises its legal obligations in operating such systems and the rights and freedoms of those individuals, including its staff, service users and others, whose images may be captured by the systems. WWHC is committed to operating CCTV systems fairly and lawfully at all times in accordance with, in particular, data protection and human rights laws.
- 1.2 WWHC considers that CCTV systems have a legitimate role to play in helping to maintain a safe and secure environment for staff, service users and others. However, WWHC recognises that this may raise concerns about the effect on individuals and their privacy. Images captured by CCTV systems are personal data which must be handled and used by WWHC in accordance with data protection and human rights laws.
- 1.3 This policy outlines why and how WWHC uses CCTV systems, how WWHC will handle and use personal data recorded by its CCTV systems, how WWHC will respond to requests for disclosure of captured images and for how long WWHC will retain captured images.
- 1.4 Responsibility for keeping this policy up-to-date and advising WWHC on the use and operation of CCTV systems has been delegated to the Data Protection Officer (DPO).

2 **Principles**

- 2.1 WWHC will comply with the following principles when installing and operating CCTV systems within its offices and facilities:
 - 2.1.1 CCTV systems will only be installed and operated where there is a clear identified and documented need and legal basis for their use.
 - 2.1.2 Privacy by design will be the principal consideration when procuring new CCTV systems or if changes are to be introduced to existing systems by way of operation or the underlying technology.
 - 2.1.3 CCTV systems will only be installed and operated upon staff request and after a data protection impact assessment (DPIA) has been completed.
 - 2.1.4 CCTV systems will be located to ensure that only necessary areas are captured by the systems and to not unnecessarily capture

areas that are not relevant to the purposes for which the system has been installed.

- 2.1.5 CCTV systems will not capture sound.
- 2.1.6 CCTV systems will only capture images of a suitable quality for the purposes for which the systems have been installed to avoid giving rise to false positives.
- 2.1.7 CCTV systems will attach date and time stamps to captured images.
- 2.1.8 Appropriate technical and organisational measures will be put in place to ensure the security of CCTV systems and captured images and to protect the systems from vandalism. Controls will be implemented to govern access to and use of such images by authorised personnel only.
- 2.1.9 Appropriate measures will be taken to provide clear signage and information to individuals whose images are captured by the CCTV systems.
- 2.1.10 Captured images will only be retained for as long as is necessary for the purposes for which the CCTV systems have been installed.

3 Reasons for use of CCTV systems

- 3.1 WWHC uses CCTV systems for its legitimate business purposes, including:
 - 3.1.1 to prevent and detect crime and to apprehend and prosecute offenders;
 - 3.1.2 for public safety;
 - 3.1.3 to provide evidence and verification of incidents involving customers, members of the public and / or staff; and
 - 3.1.4 to ensure staff are complying with the terms of the Staff Code of Conduct, WWHC's policies and procedures and their contracts of employment and to enforce the same, if required.

4 How WWHC will operate CCTV systems

- 4.1 WWHC will operate its CCTV systems, capture images and use captured images in accordance with the requirements of data protection law.

- 4.2 Staff who operate and monitor WWHC's CCTV systems must exercise care and ensure that the systems are used responsibly, professionally and lawfully and in a manner that respects and protects the privacy of individuals in accordance with this policy and applicable laws. Cameras must not be located in places that overlook private property and any pan, tilt and zoom function embedded in the cameras must not be used to focus on private property, unless this is strictly necessary in order to fulfil the reasons set out in Section 3 of this policy. Sound recording, if available, must not be activated on the CCTV systems in any circumstances. Staff will be provided with appropriate training by WWHC on the applicable laws and appropriate use of the CCTV systems.
- 4.3 WWHC will ensure that clear and prominent signs are displayed at the entrance of the area in which CCTV systems are in operation to alert individuals that their images may be captured. The signs will contain details of WWHC as the organisation operating the systems, the purpose(s) for which WWHC has installed and uses the systems and contact details for further information. Additional information on WWHC's use of CCTV systems is also available at WWHC offices and contained within WWHC's fair processing notices.
- 4.4 The security and integrity of captured images will be ensured by live feeds from CCTV systems and captured images only being viewed, accessed and stored by staff who have authority to do so. Equipment and monitoring screens will be positioned to prevent unauthorised parties from accessing and viewing the captured images.
- 4.5 WWHC will retain detailed records in situations where captured images are removed from the place that they are normally stored of (unless confidentiality reasons permit WWHC to dispense with this):
- 4.5.1 date and time of removal;
 - 4.5.2 name of the person removing the images;
 - 4.5.3 name of the person viewing the images, including any third parties;
 - 4.5.4 reason for removing the images (if the images were removed for use in legal proceedings, the crime incident number should be noted);
 - 4.5.5 outcome, if any, of the removal; and
 - 4.5.6 date and time that the images were returned to the place from

which they were removed or, if not returned, whether the images were retained for evidential purposes.

5 Disclosure of captured images to third parties

5.1 Captured images will not normally be released to third parties, for example, in response to requests for disclosure, unless there is demonstrable proof that they are required for crime prevention and detection, the apprehension and prosecution of offenders, legal proceedings or by court order. No captured images will be posted online or disclosed to the media.

5.2 WWHC may disclose captured images to any of its professional advisers, consultants and contractors where this is necessary in order to fulfil the reasons set out in Section 3 of this policy. This may include, for example, disclosure of captured images to obtain advice regarding alleged anti-social behaviour by a customer or member of the public, or alleged staff misconduct.

5.3 WWHC will retain detailed records of the following when disclosing captured images to third parties (unless confidentiality reasons permit WWHC to dispense with this):

5.3.1 date and time at which access was allowed;

5.3.2 identification of any third party who was allowed access;

5.3.3 reasons for allowing access; and

5.3.4 details of the captured images to which access was allowed.

5.4 When disclosing captured images to third parties, WWHC will only disclose the minimum necessary to comply with the request, taking into account the reasons underlying the request.

6 Individual requests for access to or erasure of captured images

6.1 Data protection law grants rights to individuals in relation to their personal data. This includes rights to request access to and erasure of their images captured by WWHC's CCTV systems. Any request received must be forwarded to the DPO immediately for handling and response.

6.2 To allow WWHC to handle and respond to requests and locate relevant captured images, requests should include (where possible):

6.2.1 date and time of the recording;

6.2.2 location where the images were captured; and

6.2.3 information to permit identification of the individual, if necessary.

6.3 In the case of access requests, individuals will only be granted access to their images if there are no other individuals identifiable or visible within the captured footage. WWHC may provide individuals with copies of images by way of screenshots or extracted footage or WWHC may ask individuals if they wish to view captured images in situ at the WWHC office where appropriate viewing facilities will be made available for this purpose.

6.4 WWHC retains copyright in all images captured by its CCTV systems. Any further use or publication of images provided to an individual in response to an access request is prohibited, unless the individual obtains authorisation from WWHC.

6.5 WWHC is entitled to refuse access to captured images in limited circumstances, such as where disclosure would prejudice the prevention or detection of crime or the prosecution of offenders. Where captured images have been passed to the Police or Procurator Fiscal, an access request from an individual will be refused until such time as WWHC has been notified by the Police or Procurator Fiscal that no proceedings will be taken, or proceedings have concluded.

6.6 The WWHC CCTV systems do not currently have the capability to erase an individual's images from captured images in response to an erasure request. If WWHC CCTV systems become capable of this in the future, then WWHC will erase the requested images where there is no legal basis or purpose for WWHC to continue to hold the images and provided that the erasure will not affect the images of other individuals who have been captured within the images.

7 **DPIAs**

7.1 WWHC will review its DPIA of its CCTV systems at least once every 12 months to ensure that their use remains necessary and appropriate and they continue to address the needs that justified their initial installation and operation. Where the outcome of a DPIA is that the use of the CCTV systems can no longer be justified as being necessary or proportionate, arrangements for the removal of the systems, together with associated equipment and signage, will be made as soon as practical thereafter.

7.2 Prior to introducing a new CCTV system, placing a CCTV system in a new location or implementing changes in how the CCTV system

operates or the underlying technology, WWHC will complete a DPIA to assess compatibility with the requirements of data protection law. The DPIA will assist WWHC in deciding if the new system, new location or changes in operation or technology are necessary and proportionate in the circumstances, whether they should be used or if limitations should be placed on their use in the light of risks. Consideration will be given to less privacy invasive alternatives, where available.

7.3 The DPO will provide advice and assistance on DPIAs, as required.

8 Retention of captured images

8.1 Images captured by WWHC's CCTV systems will be stored locally on hard disk drive and will be permanently and securely deleted after 30 days, unless continued retention is required for an ongoing issue, for example, the apprehension and prosecution of offenders, an internal WWHC operational or human resources matter or to respond to a request made by an individual under data protection law. In those situations, captured images will be retained for as long as is necessary for those purposes and steps will be taken to prevent their automatic deletion.

8.2 At the end of their useful life, hard disk drives and any physical matter, such as digital video files and hard copy prints, will be erased permanently and securely and destroyed.

9 Complaints

Complaints about the use of WWHC's CCTV systems should be forwarded to the DPO in the first instance. The DPO will assist WWHC in handling and responding to the complaints in accordance with the Complaints Policy.

10 Consequences of failure to comply

10.1 WWHC takes compliance with this policy very seriously. Failure to comply with the policy:

10.1.1 puts at risk the individuals whose images are captured by the CCTV systems;

10.1.2 carries the risk of sanctions for WWHC and associated significant reputational damage; and

10.1.3 may, in some circumstances, amount to a criminal offence by a member of staff.

10.2 Due to the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action for a member of staff under WWHC's procedures, and this action may result in dismissal for gross misconduct.

10.3 Any questions or concerns about this policy should be directed to the DPO.

11 **Review and updates to this policy**

WWHC will review and update this policy and may amend, update or supplement it from time to time and at least every 3 years or earlier, if required by changes in law.

Equalities Impact Assessment

Policy/Project/Service Information			
Lead Officer	Data Protection Officer		
Policy / Project / Service	CCTV Systems Policy	New Policy / Project / Service or revision of existing?	New
Is this a reassessment following amendments being required at a previous assessment?			
Briefly describe the aims, objectives and purpose of the policy / project / service.	To ensure compliance with the UK General Data Protection Regulation (UK GDPR)		
Who is intended to benefit from the policy / project / service? (E.g. applicants, tenants, staff, contractors)	All stakeholders		
What outcomes are wanted from this policy / project / service? (E.g. the measurable changes or benefits to members/ tenants / staff)	This policy outlines why and how WWHC uses CCTV systems, how WWHC will handle and use personal data recorded by its CCTV systems, how WWHC will respond to requests for disclosure of captured images and for how long WWHC will retain captured images		
Consultation			
Who have you engaged and consulted with as part of your assessment?			
All staff and Concierge			

Equalities Impact Assessment			
Which protected characteristics could be affected by the policy, practice, or service?		Identify any positive impact/s that could result for each of the protected characteristic groups.	Identify any negative impact/s that could result for each of the protected characteristic groups.
Age			
Disability			
Gender Reassignment			
Marriage & Civil Partnership			
Race			
Religion/Belief			
Pregnancy/Maternity			
Sex			
Sexual Orientation			

Action Plan To Mitigate Negative Impact		
What action/s are required to address the impacts arising from this assessment?		
Protected characteristics	Action	Implementation Date
Age		
Disability		
Gender Reassignment		
Marriage & Civil Partnership		

Race		
Religion/Belief		
Pregnancy/Maternity		
Sex		
Sexual Orientation		
Human Rights		

Final Decision	Tick relevant box	Include explanation where appropriate
Approved for implementation without change		
Amend or change the Policy/Project/Service		
Continue the Policy/Project/Service without change (despite impact)		
Stop the Policy/Project/Service		
Lead Officer Signature		
	Stephanie Marshall	
Date	27/08/2025	
Date approved by Management Committee/ Sub Committee	30/09/2025	