

# Privacy Policy - CCTV

Keniston Housing Association Limited

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## **1 Privacy Commitment**

- 1.1 Keniston Housing Association Limited ("Keniston") [ICO Registration No: Z5592620], is committed to safeguarding your privacy when using CCTV at certain of its sites. It does this by operating within the requirements of current applicable Data Protection legislation and with the Information Commissioner's guide 'A data protection code of practice for surveillance cameras and personal information'.
- 1.2 This Privacy Policy relates only to our use of CCTV monitoring, our response to any requests or enquiries made and sets out how any personal information gathered through the use of CCTV will be treated.

## **2 Policy**

- 2.1 We monitor certain of our property sites using CCTV for the purpose of crime prevention and prosecution of offenders, for identifying emergency situations, accidents and incidents (such as anti-social behaviour).
- 2.2 We will retain CCTV footage for no more than 28 days unless the footage is being used to investigate an alleged crime or an incident in which case it may be retained for up to 2 years following the conclusion of any investigation.
- 2.3 We process CCTV data generally without your consent in pursuit of our legitimate interests to protect the general well-being and interests of our residents.
- 2.4 Keniston takes all reasonable security measures to protect personal information from loss, unauthorised access, destruction, modification or disclosure.
- 2.5 We do not make any attempt to find out the identities of images contained within our CCTV footage unless it is to help investigate a particular incident.
- 2.6 Appropriately sized warning signs informing of the presence of CCTV, their purpose (i.e. to prevent and detect crime and anti-social behaviour), contact details and where to find a copy of this policy, are placed near each of our overt CCTV camera.
- 2.7 We will only use covert surveillance where it is necessary, reasonable and proportionate. Covert surveillance will only be used if it is preventing or detecting crime or preventing disorder, it is in the interests of public safety or it is for the protection of public health. Any decision to use covert surveillance will be fully documented and will set out how the decision to use this technique was reached and by whom.

## **3 Sharing of personal information**

- 3.1 CCTV footage will remain confidential unless there is a specific need to investigate a matter further.
- 3.2 CCTV footage will never be sold to any third parties nor will we share your information except where we are required to by law.
- 3.3 CCTV footage may be shared with the police as part of an investigation into an

incident.

#### **4 Your rights**

- 4.1 If you believe you have been filmed on our CCTV systems you have the right to request a copy of this data or the images captured.
- 4.2 Please specify the time, date and location of the footage, and also supply a clear photograph so that we can identify you and find you on the footage. The more specific you can be about what you require and about who you are, the quicker we will be able to respond to your request.
- 4.3 We may refuse access requests where this may put an ongoing investigation at risk, or where we believe that the privacy of other individuals on the footage may be compromised or where the footage is no longer being retained by us.
- 4.4 You also have the right to complain to the Information Commissioner's Office (the ICO) about our CCTV data processing activities.

#### **5 Changes to our Privacy Policy**

- 5.1 We regular review our Privacy Policy and any updates will appear on this webpage.

#### **6 How to contact us**

- 6.1 If you would like any further information or if you should wish to make a request to view certain footage containing your image, please write to us at 13 Artington Close, Farnborough, Kent BR6 7UL or email us at [enquiries@kenistonha.co.uk](mailto:enquiries@kenistonha.co.uk).
- 6.2 You should also refer to our Data Protection policy and to our CCTV procedures for further information on how we treat, share and dispose of your personal information together with your rights with regards your information held by us.
- 6.3 A copy of these policies and procedures can be found on our website.

This Policy was approved by the Management Team on 31 October 2017