



WYTHENSHAW COMMUNITY HOUSING GROUP

CCTV CODE OF PRACTICE

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PREAMBLES

Owner of the System: **Wythenshawe Community Housing Group**
8 Poundswick Lane
Wythenshawe
Manchester
M22 9TA

Definitions**1.1 In this code:**

- “Public place” has the meaning given by Section 16(b) of the Public Order Act 1986 and is taken to include any highway and any place to which at the material time the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission.
- “Relevant authority” has the meaning given by Section 33(5) of the 2012 Act.

- “Surveillance camera systems” has the meaning given by Section 29(6) of the 2012 Act and is taken to include: (a) closed circuit television (CCTV) or automatic number plate recognition (ANPR) systems; (b) any other systems for recording or viewing visual images for surveillance purposes; (c) any systems for storing, receiving, transmitting, processing or checking the images or information obtained by (a) or (b); (d) any other systems associated with, or otherwise connected with (a), (b) or (c)¹.
- “System Operator” - person or persons that take a decision to deploy a surveillance camera system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or processing of images or other information obtained by virtue of such system.
- “System User” – person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such system.

‘Area’	The areas covered by CCTV surveillance under the Scheme.
‘Code’	The Code of Practice as set out hereto.
‘Emergency Services’	Police, Fire, Ambulance Services
‘GMP’	Greater Manchester Police
‘Scheme’	The CCTV system operated by the group, may be extended from time to time to take into account spikes in anti-social behaviour
‘Community Safety Manager’	The Manager within the Group who has specific responsibilities for the scheme, including the management of the staff that run the CCTV system.
‘Group’	Wythenshawe Community Housing Group
‘RIPA’	Regulation of Investigatory Powers Act 2000

1. INTRODUCTION

1.1 Wythenshawe Community Housing Groups CCTV system (the 'Scheme') has been designed to:

- Enhance public safety in and around the Area
- Deter criminals and potential criminal activity
- Assist the police to gain evidential quality recording of incidents
- Improve response times; and to reduce the fear of crime in the Area generally.

The Scheme shall be supported by a partnership of organisations who share and support the Scheme's objectives and who may also provide further financial or operational support to the workings of the Scheme.

1.2 Brief Description

The system comprises of functional and static colour dome cameras situated on buildings and throughout the Area in various locations. The cameras are monitored 24 hours per day, and all information is recorded in the Control Room based within Wythenshawe House.

The CCTV control room is manned 24 hours a day by a minimum of two SIA licenced members of staff.

This Code of Practice has been provided to form the basis for the control, operation, management and accountability of the system. It is held and maintained by the CCTV Manager.

1.3 Responsibilities

1.3.1 Overall Management – Wythenshawe Community Housing Group
Technical Supervision - as above

1.3.2 The ownership and copyright of recorded material produced by the Scheme rests with Wythenshawe Community Housing Group.

2. OBJECTIVES AND OPERATIONS

2.1 The main objectives of the Scheme are:

- To reduce the fear of crime and help to reassure the general public that the Area is a safe place to work, visit and live in.
- To help secure a safer environment for those who work, live, trade in and visit the Area.

- To help prevent crime by deterring criminal activity, by detecting such activity, by helping identify offenders and assisting in the apprehension of offenders leading to the prosecution of the offenders. By providing GMP and the Trust with evidence to take action in the Courts, where appropriate; help in the maintenance of public order, and to provide assistance to the emergency services.
- To make the area a more attractive place to live, work and visit.
- To prevent and respond effectively to all forms of harassment.
- To reduce the incidence of criminal damage, vandalism and graffiti, to improve the environment and reduce environmental maintenance costs.

2.2 Provision of Evidence

- 2.2.1 Recorded evidence shall, when appropriate, be made available to the Police, the City Council or national government departments. Specific investigations may be assisted on request from law enforcement agencies, where the latter would use the system and evidence collected in accordance with the Police and Criminal Evidence Act 1984. Such assistance must be authorised by the Community Safety Manager

2.3 The Code of Practice

- 2.3.1 The Group is committed to compliance with the terms of this Code and will be publicly accountable for discharging this commitment, through an annual performance report published on the Groups website and through occasional Board reports

2.5 Cameras

- 2.5.1 All of the cameras offer full colour, functional capability.

2.6 Monitoring Equipment

- 2.6.1 The 24 hour control room is situated at Wythenshawe Community Housing Groups Head Office. The equipment has the capability of recording all cameras simultaneously throughout a 24 hour period.

3. STATEMENT OF PURPOSE AND PRINCIPLES

3.1 Purpose

- 3.1.1 This section states the intention to support the objectives of the System and outlines how it is intended to do so.
- 3.1.2 The purpose of the System and the process adopted in determining the reasons or implementing the System are as previously defined for achieving the objectives detailed within Section 2.

3.2 General Principles of Operation

- 3.2.1 The System will be operated in accordance with all the requirements and the principles of the Human Rights Act 1998.
- 3.2.2 The operation of the System will also recognise the need for formal authorisation of any covert 'directed' surveillance as required by the Regulation of Investigatory Powers Act 2000.
- 3.2.3 The System shall be operated in accordance with the General Data Protection Regulation and Data Protection Act 2018 at all times and the Protection of Freedoms Act 2012.
- 3.2.4 The System shall be operated fairly, within the law and only for the purposes for which it was established and identified within the Code, or which are subsequently agreed in accordance with the Code.
- 3.2.5 The System shall be operated with due regard to the principle that everyone has the right to respect for his or her private and family life and home.
- 3.2.6 The public interest in the operation of the System will be recognised by ensuring the security and integrity of operational procedures.
- 3.2.7 The Code is intended, as far as reasonably possible, to balance the objectives of the System with the need to safeguard the individual's rights. Every effort has been made throughout the Code to indicate that a formal structure has been put in place, including a complaints procedure, by which it can be identified that the System is not only accountable, but is also seen to be accountable.
- 3.2.8 Participation in the system by any organisation, individual or authority assumes an agreement by all such participants to comply fully with the Code and to be accountable under it.

3.3 Home Office Surveillance Camera Code of Practice 2013

- 3.3.1 Our Code of Practice reflects the 12 Guiding Principles listed in the Home Office Surveillance Camera Code of Practice 2013.
 - 1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
 - 2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

4. PRIVACY AND DATA PROTECTION

4.1 Public Concern

- 4.1.1 Although the majority of the public at large may have become accustomed to overt surveillance, those who do express concern do so mainly over matters pertaining to the processing of the information (Data), i.e. what happens to the material obtained.
- 4.1.2 All Data obtained by virtue of the System shall be processed fairly and lawfully and, in particular, shall only be processed in the exercise of achieving the stated objectives of the System. Personal Data shall be processed with due consideration to a persons' right to respect for his or her private and family life and their home.
- 4.1.3 We respect and support individuals' rights to privacy and this is a primary consideration in the operation of the Group's CCTV systems.
- 4.1.4 Monitoring Centre CCTV Operators are only permitted to use our CCTV cameras to view public areas. They must not be used not to look into the interior of any private premises or any other area where an infringement on the privacy of individuals may occur.
- 4.1.5 There are exceptional circumstances where a CCTV operator may view private premises and these are set out below;
- i) If it was in immediate response to a police or other enforcement agency request for assistance following an incident being committed.
 - ii) If a CCTV operator, whilst operating the cameras in accordance with this Code of Practice, observes an incident which s/he believes indicates that a serious incident is being, or is about to occur, in a non-public area.
- 4.1.6 Any event where an operator takes a decision positively to view or continue viewing a private area, as described in the circumstances above, must be entered into the system. The details must include location, time, date, camera number and the reason for the observation. Operators will be required to justify their actions. Any breach of this condition of employment will result in disciplinary proceedings and may lead to the dismissal of the operator.
- 4.1.7 We carry out privacy impact assessments (PIA) on all of our CCTV systems every year. This is to assess if a system is still doing the job it was installed to do.
- 4.1.8 PIAs will also be carried out prior to any new CCTV cameras being installed. A PIA assesses whether cameras unnecessarily impact on people's privacy. If they do then action must be taken either to mask images or locate the cameras in alternative positions.

4.2 General Data Protection Regulation and Data Protection Act 2018

4.2.1 The operation of the System has been notified to the Information Commissioner in accordance with current General Data Protection Regulation and Data Protection Act 2018.

4.2.2 The Data Controller for the System is Wythenshawe Community Housing Group

4.2.3 All Data will be processed in accordance with the Data Protection Principles of the General Data Protection Regulations and Data Protection Act 2018:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

4.3 Request for Information (Subject Access)

4.3.1 If Wythenshawe Community Housing Group holds personal data about you, under the General Data Protection Regulation (GDPR) you have the following rights over your personal data:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- rights in relation to automated decision making and profiling

4.3.2 You can contact us to request to exercise these rights at any time by contacting: The Data Protection Officer, Wythenshawe Community Housing Group, Wythensahwe House, Poundswick Lane, Wythenshawe, Manchester M22 9TA

4.3.3 Before we can take any action on a request, it may be necessary to verify your identity so we can be sure any information we are being asked to alter or provide relates to you. To do this we will require TWO official documents (such as a passport or driving licence) and in certain circumstances will require further identification, for example if:

- a request is being made by a third party on behalf of the data subject;
- the request is made by someone whose name or details we do not recognise; or
- contact details provided in the request do not match the contact details we hold on file for the data subject.

4.3.4 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive.

We will respond to requests without undue delay and in any event within one month. In exceptional cases this one month period may be extended by two further months if the request is particularly complex and involves a large number of requests.

If making a request for access (subject access request) it would be helpful if you could complete a Subject Access Request form which will aid us in conducting the appropriate searches to provide you with the information required. – **See Appendix 1**

4.4 Exemption to the Provision of Information

4.4.1 Personal Data processed for any of the following purposes:

- i) The prevention or detection of crime; or
- ii) The apprehension or prosecution of offenders, is exempt from the subject of recorded images, replay or copy any pre-recorded data in accordance with the Code

4.4.2 Each and every application will be assessed on its own merits and general blanket exemptions will not be applied.

4.5 Criminal Procedures and Investigations Act 1996

4.5.1 The Criminal Procedures and Investigations Act 1996 introduced a statutory framework for the disclosure to defendants of material, which the prosecution would not intend to use in the presentation of its case (known as unused material). Disclosure of unused material under the provisions of this Act should not be confused with the obligations placed on the Data Controller by Article 15, Right of access of the General Data Protection Regulation.

5. THE HUMAN RIGHTS ACT

5.1 Under the Human Rights Act, which came into force 2nd October 2000 special responsibility falls to all government departments, local authorities and public organisations involved with CCTV regarding people's right to respect for private and family life. The Human Rights Act provides that there should be no interference by a public authority with right to respect for private and family life except when in accordance with the law.

5.2 The Human Rights Act provides that any infringement of any of the Human Rights referred to in the Schedules & Articles to the Act which is not deemed to be absolute rights must be justified and follow the government's guidelines. This means that any infringement must:

- Be proportional to the risk of the activity being monitored,
- be legal and therefore comply with the relevant legislation such as the Police and Criminal Evidence Act and the General Data Protection Regulation and Data Protection Act,
- Be accountable (as detailed throughout this Code) to the people of the area,
- Be necessary, in order to increase community safety or indeed to prevent and detect criminal activity, these being a furthering of the interests of a democratic society

5.3 Major changes to the Code will only be made after appropriate consultation with relevant interested groups, including GMP and any other organisation with a participatory role in the operation of the scheme and will be agreed by the Groups Board

5.4 Minor changes will be agreed by the Group's senior management team and will be reported to Board. Summary comment on changes will also be included in the annual report.

6. RESPONSIBILITIES OF THE OWNER OF THE SYSTEM

6.1 The group has prime responsibility for compliance with the purpose and objectives of the system, for management and security and the protection of the public and individuals.

6.2 The group will consult with and provide information to the public about the operation of the system, and about any proposed changes to the system or Code of Practice.

6.3 The Trust will be responsible for consultation, accountability, publication of information and dealing with complaints. It will also be responsible for ensuring that evaluation and inspection take place, and for formal monitoring of compliance with the code by the Group's staff and any contractors appointed to undertake duties in connection with the system.

7. PARTNERSHIP

7.1 The partnership consists of key members and supporters and includes, but is not limited to, the following organisations:

- Wythenshawe Community Housing Group
- Manchester City Council
- Greater Manchester Police
- Greater Manchester Fire and Rescue Service

7.2 The primary aim of the partnership is to work together and encourage a common commitment to reduce crime in the Area for the benefit of all. The CCTV system is to be seen as part of a strategy to address crime in the area. As the group will have the major financial stake in the system, it will take responsibility for making any major decisions not achievable through consensus with its partners, but will pay due regard to the wishes of partners where the scheme directly impinges on their activities. Regular meetings will be arranged for key members for the following purposes:

- To agree on decision making arrangements.
- To agree on operational methods, monitoring, audit of the system and any revision of this Code of Practice.
- To establish methods of receiving reports relevant to the management of the system.
- To provide formal reviews of the achievements of the CCTV partnership at regular intervals.
- To agree safeguards to ensure that the integrity of Police operations is safeguarded within partnership discussions.

8. MANAGEMENT OF THE SYSTEM

8.1 The day to day management of the Scheme and the compliance with the Code of Practice will be the responsibility of the Community Safety Manager.

8.2 Formal liaison will be established between the Community Safety Manager and all partners. Access to the recordings and the control room will comply with specific guidelines and all access will be recorded and monitored.

8.3 Links with the Police will be conducted and managed in an agreed manner under direction of the Community Safety Manager. The Community Safety Manager will be responsible for developing and monitoring operational documentation required to run the system in compliance with the Code of Practice.

9. MAINTENANCE OF THE SYSTEM

9.1 To ensure compliance with the Information Commissioner's Code of Practice and that images recorded continue to be of appropriate evidential quality, the System shall be maintained under a maintenance agreement.

9.2 The maintenance agreement will make provision for regular / periodic service checks on the equipment which will include cleaning of all-weather domes or housings, checks on the functioning of the equipment and any minor adjustments that need to be made to the equipment settings to maintain picture quality.

9.3 The maintenance agreement will also provide for 'emergency' attendance by a specialist CCTV engineer on site to rectify any loss or severe degradation of image or camera control.

- 9.4 The maintenance agreement will define the maximum periods of time permitted for attendance by the engineer and for rectification of the problem, depending upon the severity of the event and the operational requirements of that element in the System.

10. INSTALLATION

10.1 Sound

No sound will be recorded by equipment installed which is directly connected to the Scheme.

10.2 Change

Before the introduction of major technological change that will have a significant effect on the capacity of the system, the implications will be fully assessed in relation to the key purpose of the system and be subject to consultation.

10.3 Dummy Cameras

In order to enhance public confidence in the system, no dummy cameras will be used within this system.

11. ACCOUNTABILITY

11.1 The Partnership

Agreement will be reached between the partners, on provision for communication and mutual exchange of information about their differing interests in the system, and for reports on compliance with the Code.

11.2 The Police

The Police will be required to satisfy the Group that systems have been introduced to monitor and audit the participation of the Police in the scheme, including compliance with the Code. This monitoring and audit should be monitored via agreement with the Police, by officers of appropriate seniority and experience within GMP.

12. PUBLIC INFORMATION

- 12.1 The public shall be made aware of the system and its purpose in order to gain their understanding and acceptance. The following principles will be adopted:

- Cameras will not be hidden.
- Signs will be displayed at key points stating that a CCTV system is in operation; these signs will also identify the owner of the system.
- The signs will indicate the general area which the system covers.

13. RESIDENTIAL AREAS

- 13.1 The cameras adjacent to residential areas and properties may have electronic stops that will prevent any intrusions, impact upon civil liberties and observations of private properties. Excepting unavoidable wider angle, longer distance or panning shots, every effort will be made to ensure that domestic premises are not included within any camera's field of view in order to preserve personal privacy.
- 13.2 Where appropriate, privacy restrictors shall be used for cameras adjacent to residential areas. However, where there is the potential to oversee directly a residential property, cameras will be operated with due regard to the privacy of the individuals living there, and spot checks will be made on data to justify the contents of the recordings. As a requirement of the Group's Code of Conduct, staff will be expected to adhere to high levels of confidentiality regarding the individual right to privacy, and any employee found abusing the system will be subject to disciplinary procedures on the grounds of gross misconduct. Such allegations, if proven, will result in dismissal.

14. ASSESSMENT OF THE SCHEME AND CODE OF PRACTICE

14.1 Evaluation

14.1.1 The system will be evaluated annually by the Group. The evaluation will include:

- Assessment of impact on crime.
- Assessment of areas with CCTV.
- The views of the public.
- Operation of the Code of Practice.
- The continuing requirements of the system.
- The possible improvement required.
- The publishing of the evaluation.

14.1.2 The results of the evaluation will be taken into account in the future function, management and operation of the scheme.

14.2 Monitoring

The Community safety Manager will continually monitor the operation of the system and the implementation of the Code of Practice.

14.3 Inspections

Independent inspections will be considered if felt necessary as a further check on compliance with standards. This would be conducted by independent persons with relevant knowledge, not connected to the day to day running of the operation.

15. STAFF

15.1 Wythenshawe Community Housing Group ensure

- Effective and fair systems of recruitment and selection of staff.
- A requirement that staff will be qualified at a suitable level on appointment or be offered such training as is required to fulfil their duties and obtain an SIA CCTV Public Space Surveillance Licence.
- A disciplinary procedure which incorporates compliance with the Code of Practice and procedures and ensuring that all relevant staff are fully briefed on the disciplinary consequences arising in the event of breaches of the Code or misappropriation of recordings.
- A requirement of confidentiality during and after termination of employment.
- Systems of monitoring and supervision that ensure compliance with the Code of Practice and operational procedure.
- All employees are trained to a proficient level before they are allowed to take up a position in the monitoring centre. All staff training will be provided and supervised by persons qualified and experienced in all aspects of the management and operation of the CCTV system.

16. COMPLAINTS

16.1 The group will publish information about the manner in which an individual can make a complaint about any aspect of the scheme. Particulars of how to make a complaint, the name and address of the person to whom the complaint should be made and the responsibility in handling the complaint will be displayed in the same locations as the Code of Practice.

16.2 Summary details of complaints will be published in the Group's annual report.

17. BREACHES OF THE CODE INCLUDING SECURITY

17.1 Responsibility for security rests with the Group.

17.2 Breaches of the Code of Practice and of security will be subject to proper investigation, in line with the groups disciplinary procedures. The investigating person shall be responsible for making recommendations to the Executive Director of Housing to remedy any breach proven as well as liaising with the Community Safety Manager and other partners as may be required.

17.3 Contractors and equipment suppliers will also be required under their contract of service to comply with the terms of this Code of Practice.

The control room will be a secure unit at all times. Only authorised named personnel are allowed access to the control room, which is strictly limited to the Community Safety Manager, the CCTV Supervisors/Operators, the Police and authorised maintenance contractors and any other person authorised by the Community Safety Manager.

18. CONTROL AND OPERATION OF THE CAMERAS

- 18.1 Operators of camera equipment will be required to act with the utmost probity and integrity. Only staff with responsibility for using equipment will have access to operating controls, unless authorised as an investigating person within the terms of sections 12.3 and 15.2 of this Code or otherwise authorised by the Community Safety Manager.
- 18.2 Use of the cameras shall accord with the purpose and key objectives of the scheme and shall comply with the Code of Practice and resulting operational instructions.
- 18.3 Cameras will not be used to look into residential property. Operational procedures and technological measures (see section 11) will be implemented where necessary to improve restraints on the use of cameras in connection with individual residential premises. However this clause shall not be taken to include surveillance of appropriate communal areas, pathways, roads, parking areas or service facilities such as lifts.
- 18.4 All camera operators will be made aware that recordings are subject to routine audit and that they may be required to justify their interest in a member of the public or premises.
- 18.5 The cameras are (generally) to be prominently placed in fixed positions within public view so as to obtain the best views for detection, and reflect their predominantly overt use to deter crime and anti-social activity and to assist the public to feel safer. No covert cameras will be used as part of the Scheme. For the avoidance of doubt these provisions do not apply to any occasional use of video or sound recording carried out separately by the Group or its agents, via equipment not directly connected to the Scheme, for the purposes of investigating nuisance or other anti- social behaviour.
- 18.6 Clearly designed and worded signs, indicating the Scheme owner's name and address are to be displayed in public view at the perimeter and centre of the surveillance area, indicating that CCTV is in operation, so as to:
 - a) Respect the individual's right to be advised that CCTV is monitoring the area, and that their image may be recorded in public places.
 - b) Maximise the deterrent value of CCTV to potential offenders.
 - c) Reduce the public fear of crime.

18.7 All cameras have high resolution colour capabilities to enhance images for easier identification, to aid detection of offences and to improve evidential material. Functional dome cameras will allow continuous through panning of up to 360 degrees, tilting to required angles. Cameras will also be able to operate efficiently at both night time and in poor lighting conditions.

18.8 All functional dome cameras are to be remotely controlled from the control room to allow strategic viewing of their coverage areas. Cameras may be subject to automatic movement when not being operated manually by the operators to enhance their deterrent and detection abilities, and also have an auto park facility which returns the camera to a home position for maximum viewing of the area under surveillance.

18.9 **Control Room Practice and Camera Control**

18.9.1 High standards of camera operation are to be maintained at all times and subject to Section 16.1 only the control room staff and those being trained are allowed to operate the cameras or recording equipment. Operators must be capable of meeting the training standards agreed by the Community Safety Manager before being allowed to operate cameras without supervision. Performance will then be regularly assessed by the Community Safety Manager. All camera use will accord with the purposes and objectives of the Code of Practice and any operating procedures.

18.9.2 Operators will complete the control room duty rota by name, signature and time of handover at the start and end of all shifts. One operator will always be present in the control room so that continuous surveillance can be maintained, two fully trained operatives will be on duty at all times and at no point should the control room be left unmanned.

18.9.3 When refreshment or changes of routine breaks are to be taken one fully trained or operative or supervisor must remain in control. Eating and drinking is only allowed in the control centre staff room. No smoking is allowed anywhere within the control centre building. Toilet facilities shall also be available.

18.9.4 In the event that deterrence is ineffective, cameras will be proactively monitored to detect criminal incidents or anti-social activities within their coverage areas at the earliest possible opportunity. The control room is equipped with recording facilities to ensure that events can be recorded to acceptable evidential standards if court proceedings ensue. All cameras will record in time lapse mode throughout operations. However, upon the detection of an incident, the operators will ensure that events are then recorded in real time which will not interrupt the continuity of the main CCTV system.

18.9.5 Incidents will then be dealt with according to agreed procedures with the Emergency Services. The Police will be notified of the incident by telephone and/or police radio and as the incident develops, cameras will be used to

gather evidence to identify suspects and help secure arrests and court convictions.

- 18.9.6 Regular patrols should be completed through the camera network paying attention to hot spot areas, company buildings and sites. These patrols should be logged onto the appropriate reporting system (House on the Hill, Daily Occurrence Books, Orchard) and any concerns flagged with the Team Leader.

In the event of a major incident, contingency plans shall be activated between CCTV staff, the Community Safety Manager, the Police, other emergency services and the Groups senior management team.

19. ACCESS TO AND SECURITY OF MONITORS AND CONTROL ROOM

- 19.1 Access to view monitors, whether to operate equipment or to view images is limited to staff with that responsibility. A control room daily occurrence book will record staff on duty each shift, and the names of any persons or groups that have been authorised by the Community Safety Manager or Executive Director of Housing to have access to the control room and view the monitors.

- 19.2 A responsible operator will be present during the operation of monitors. If monitors are to be left unattended, the area in which they are kept will be secured against unauthorised entry. Public access to or the demonstration of monitors shall not be allowed unless specifically authorised by the Community Safety Manger.

- 19.3 The control room will be kept secure at all times and arrangements for this will include:

- Routines and procedures and other facilities necessary to ensure that the control room is protected from unauthorised access.
- Records will be kept of all access to the control room, recording details of the individual concerned and the times of arrival and departure.
- Operation times and the number of staff on duty will be clearly defined and complied with.
- Access to the control room will be restricted to operating staff and their managers according to prearranged shifts and on production of valid identification, and other members of the groups staff designated by the Community Safety Manager.
- Technical repairs will be carried out in controlled circumstances according to a set procedure.
- Police visits will usually be prearranged and always recorded as with other visits.

- Independent inspectors appointed by the Group under the terms of this Code may visit without prior appointment.

19.4 Supervision and Audit

Security procedures for access to the control room will be maintained and strictly adhered to. Access will be monitored and all concerned will be made aware that security procedures on access to the control room are included in the regular audit.

19.5 Daily Occurrence logs

Our management system will be maintained daily, giving details of control room activity, incidents, calls and actions

19.6 Health and Safety

Compliance with health and safety legislation will be a requirement of the Code of Practice. Specific requirements will include:

- Electricity at Work Regulations
- VDU Regulations
- Management of Health and Safety at Work
- Workplace Regulations

20. DATA AND RECORDED MATERIAL

20.1 Use of Recorded Material

Recorded material will be used only for purposes defined in this Code of Practice. In particular, recorded material will not be sold or used for commercial purposes or the provision of entertainment. The showing of recorded material to the public will only be allowed in accordance with the law; either in compliance with the needs of the Police in connection with the investigation of crime, which will be conducted in accordance with the provisions of any relevant Code of Practice under the Police and Criminal Evidence Act 1984 and any advice and guidance given to the public from time to time; or in any other circumstances provided by law. The provisions of the General Data Protection Regulation and Data Protection Act 2018 also apply.

20.2 Ownership

Ownership of recorded material and copyright in the recorded material will be held by the Trust.

20.3 Accurate Recording

Recording facilities will be checked daily to ensure it is in good working order. A test recording of the data recorded will be made monthly to check data quality.

20.4 **Use of Data - CDs/DVDs**

Time lapse data will be stored on the hard drives and retained at least 31 days before being reused. Real time CDs/DVDs are only kept for 31 days unless otherwise requested. Any data being required for evidential purposes will be separately indexed and security stored separately to avoid accidental reuse.

The data retention policy will be made known to the Police, Crown Prosecution Service and local Law Society.

CDs/DVDs will not be rewritable and will be disposed of in a secure manner.

20.5 **Cataloguing, Storage and Recording of CDs/DVDs**

CDs/DVDs will be individually labelled and stored in a secure cabinet. A Data Register will be maintained giving exact date and time of each use of each CD/DVD, recording the reason for its request, and of the individual responsible for creating that CD/DVD. (The Data Register will also be stored securely).

20.6 Staff will be informed that records will be kept for library purposes and the Data Register will be included in the regular audit.

20.7 **Evidential Use of Recordings**

CDs/DVDs required for evidential purposes will be treated as exhibits and will be retained and stored according to procedures agreed with the Police. Where appropriate, procedures will be approved by a prosecuting authority. Any CD/DVD that is produced as evidence will be of proven integrity. Staff will be required to provide Police with any statements required for evidential purposes.

20.8 **Police Access to Data**

Police may apply for access in accordance with any agreement made with the Group, where the Police reasonably believe that access to specific data is necessary for the investigation and detection of a particular offence or offences, or for the prevention of crime.

20.9 The Police shall sign the Data Register for any evidence removed from the control room. The Police may also request access to data under the provisions of the Police and Criminal Evidence Act 1984 (PACE).

20.10 Data provided to the Police shall at no time be used for anything other than the purpose specified and identified when the data is released to the Police by the control room. Arrangements may be made from time to time for a Police Officer appointed in accordance with liaison arrangements (see Section 7) to visit the control room and confirm that agreed procedures are being followed.

Where required, the Police may ask for original hard drives and these will be produced on new hard drives supplied by the Police. The original hard drive will be labelled and locked in a secure safe for possible use at a later date or deleted and reused if required.

20.11 **Third Party Access to Data**

Access to data may be obtained in connection with civil disputes where so ordered by the Courts or in accordance with the provisions of the Civil Evidence Act 1995 or to Solicitors acting for defendants or victims in connection with criminal proceedings. No other access will be allowed, unless approved by the CCTV Manager.

21. **PHOTOGRAPHS**

21.1 Still photographs will not be taken as a routine. The taking of each photograph must be capable of justification.

a) **Taking Still Photographs During Live Incidents**

Still photographs from live incidents will only be taken at the request of the Police Officer in charge at the scene when the officer should be identified, and a record made of the request, together with a note of the incident and time and date of the request.

b) **Production of Stills**

A Police Officer authorised by a Senior Officer of at least the rank of Inspector, may request that the operator produces a still photograph taken at a live incident, or a still photograph from a data recording. The officer giving this authorisation should be satisfied that the still photograph is required for the prevention or detection of crime. Still photographs shall only otherwise be produced via instructions issued by either the Community Safety Manager.

21.2 All still photographs will remain the property of the group and will be indexed in sequence. A record will be kept of the reason for the production of the photograph, date, time, the particulars of production of a live photograph, and information identifying the control room staff member responsible for producing the photograph. Any still photograph released to the Police will be dealt with by the Police as an exhibit and should at no time be used for anything other than purposes specified and identified when released to the Police.

21.3 The production of sample photographs during training or updating for camera operators should be conducted strictly in accordance with procedures set by the Scheme Manager.

21.4 Further, unless otherwise advised by the Police, any photographs produced by the system should:

- not be on display and should be kept in a binder or album.
- be retained only if provided by Police for this purpose.
- be seen only by individuals stipulated by the Police.

21.5 Procedures under this part of the Code of Practice will be subject to monitoring and audit (see Section 12.3). A Police Officer, appointed in accordance with liaison agreements (see Section 7) will be allowed access from time to time to check compliance with these requirements.

22. DEALING WITH INCIDENTS

22.1 Locally agreed procedures will provide for:

- Referral to Police who will respond according to local agreement. See GMP grading response guidelines.
- Compliance with the airwave service code of practice when dealing with incidents reported via the Police radio.
- Compliance with current legislation and protocols with partner agencies, For example, information sharing protocol with GMP and MCC.
- Adherence to the control room out of hour's emergency incident management procedure.
- Adherence to the Groups critical incident reporting and escalation policy.

23. POLICE CONTACTS AND USE OF THE SYSTEM

23.1 Routine Contact

Officers will be identified by the Police for liaison for day to day purposes. Senior staff will be nominated for liaison on audit and for decisions of significance for the operation and management of the scheme (see Section 7). Access to data and the control room must comply with the Code of Practice and the time and date and purpose of such access must be recorded and monitored.

23.2 The purpose of different links, which must accord with the Code of Practice and any Operational Guidance, between the Police and control room should be understood, complied with and not exceeded. Any substantive change in these links will be deemed to a change in the Code of Practice and must be approved by the Group's Board before being implemented. Telephone calls from and to the Police, the officer involved, purpose of the call and outcome, should be recorded in the control room occurrence book.

23.3 Police Use of the System

Police use of the system in any manner must accord with the Code of Practice and any other protocols developed between the Group and the Police.

- 23.4 Use of, or takeover of control of the system will be in clearly defined circumstances, be agreed according to local needs and the purpose of the scheme, be revised annually in context of the local crime and disorder framework plan and according to the Code of Practice.
- 23.5 Any request from the Police for use of the system in any manner that is not provided for by the Code of Practice, must be the subject of a specific agreement between the Community Safety Manager and Greater Manchester Police prior to the use of the system for that purpose, with the reason for the request stated in writing and in compliance with RIPA.
- 23.6 Any such use of the system shall be recorded by the control room and the Police, and be subject to audit by both control room and Police procedures. In the control room, reasons for use should be recorded in the occurrence book, with particulars of date and time and name of the officer making the request. Records shall be retained by the Police, recording the same particulars, and the officer requesting special use taking the responsibility for the decision.
- 23.7 If monitoring is taking place by both the control room and the Police, recording will only be carried out by the control room to avoid creation of two sets of recordings.

ADDITIONAL WCHG POLICIES AND PROCEDURES:

The following policies and procedures should be adhered too in conjunction with the code of practice

1. CCTV access control
2. Out of Hours Emergency incident management procedure
3. Critical Incidents Reporting Policy
4. Out of hours emergency repairs procedure
5. Duty Manager out of hours procedure



Data Protection Act – Subject Access Request Form

This Subject Access Request Form applies to current or former Wythenshawe Community Housing Group (WCHG) residents including Willow Park Housing Trust and Parkway Green Housing Trust.

The Data Protection Act and the General Data Protection Regulation provides individuals with rights over how their personal information is processed. These rights entitle you to a description of all the personal data which we hold about you; the purposes for which it is used; and to whom your data may be disclosed. You are also entitled to obtain of the personal data we hold on you (subject to certain exemptions).

To enable us to respond efficiently to your request please:

- 1 Complete the relevant sections of this form
- 2 Enclose a copy of the identification documents requested (see attached guidance)

Send the completed form and copy documents to:

Wythenshawe Community Housing Group
Business Development Team
Wythenshawe House
8 Poundswick Lane
Wythenshawe
M22 9TA

If you are the Data Subject (you are requesting your own personal data that we hold) please complete sections A, B and C.

If you are requesting the personal data on behalf of someone else, then please complete sections A, B, C & D and enclose proof that you have authority to act on behalf of the data subject.

Section A: Data Subjects' details	
Full Name:	
Address:	
	Post Code:
Tel:	Mobile:
Email:	
<p>Are you:</p> <p>A current or former WCHG resident <input type="checkbox"/></p> <p>A current or former staff member <input type="checkbox"/></p> <p>Another individual (please tell us your connection with WCHG) _____</p>	
<p>Please provide a copy of a document that verifies your name and address, such as copy of your driving license, a utility bill, council tax bill etc.</p>	

Section B: Personal Data you are requesting
<p>Please use this section to tell us exactly what personal data you would like to see. "Personal Data" means information relating to the Data Subject as an individual.</p> <p>Please be as specific as possible as this will help speed up our response.</p>
<p>Details of information requested (with dates):</p>
<p>Which format you wish to receive this information? (please tick)</p> <ul style="list-style-type: none"> <input type="radio"/> Electronically on a CD <input type="radio"/> Paper copies
<p>How would you like to receive this information? (please tick)</p> <ul style="list-style-type: none"> <input type="radio"/> Collect in person <input type="radio"/> Royal Mail delivery

Please indicate under which services your request falls and what data and/or documents you would like to see:	
Service	Information/documents you would like to request
Allocations, lettings and transfers	
Anti-social behaviour	
Rent / service charges	
Customer relations (a complaint you may have made)	
Tenancy	

<p>Please use this space to include any notes to help us locate the information you are requesting, for example by listing the specific documents or information that you would like disclosed:</p>

Section C: Data Subject Declaration	
I confirm that I am the Data Subject and that the information given on this form is correct	
Signed:	Date:
Name (please print):	
Section D: Requests made on behalf of someone else	

This section should ONLY be completed when someone is acting on behalf of the Data Subject (i.e. a request by a third party):	
Full name:	
Address:	
	Post Code:
Tel:	Mobile:
Email:	
Relationship to Data Subject:	
Signed:	Date:
Please provide proof of the Data Subject's identity (i.e. a copy of their driving licence, a recent utility bill or council tax bill) and your authority to act on their behalf	

Checklist:

Please ensure that you have provided us with the following:

- Description of the data you require
- Dates relating to the data you require
- Proof of identity
- Signed declaration (section C or D)
- Authority to Act (third party requests only)

Please send the completed form and required documents to:

**Business Development
Wythenshawe House
8 Poundswick Lane
Wythenshawe
M22 9TA**

Please note:

Information requested on behalf of the Data Subject can only be processed if written consent is enclosed with this form. WCHG reserves the right to obscure or suppress information that relates to third parties (under the terms of section 45 of the Data Protection Act).

Personal information collected on this form is required to enable your Subject Access Request to be processed, and will only be used in connection with this request.

For further details a Data Protection leaflet (information for customers) is available on our website and upon request.

Office use only:

Request received:
ID received:
Date completed:
Notes: