The Whiteley Homes Trust

CCTV Policy

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Original Policy Date	12 May 2026
Review Period	Bi-annually
Next Review Date	May 2028
EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
April	**LT/HODs**	**Feedback incorporated into final version**	**FARC**	**12/05/26**	**1.0**

Introduction

This policy sets out the approach of **The Whiteley Homes Trust** ("the Trust") to the use of Closed-Circuit Television (CCTV) across Whiteley Village, including the estate, offices, extra care accommodation, café, woodland areas and associated facilities.

CCTV is used to promote safety, safeguard residents and visitors, protect Trust assets, and support the investigation of incidents. The Trust is committed to ensuring CCTV is operated lawfully, ethically and transparently, with proper respect for the privacy and rights of individuals.

Scope of Applicability

This policy applies to:

- Employees, agency workers, contractors, bank workers, volunteers and Board members (collectively referred to as "employees")
- Residents, beneficiaries, tenants and private leaseholders
- Visitors and members of the public
- Contractors, suppliers and partner organisations

Legal Framework

The Trust operates CCTV in accordance with:

- **Data Protection Act 2018**
- **UK General Data Protection Regulation (UK GDPR)**
- **Human Rights Act 1998**
- **Protection of Freedoms Act 2012**
- **Information Commissioner's Office (ICO) CCTV Code of Practice**

CCTV images constitute personal data and are processed in line with data protection principles, including lawfulness, fairness, transparency, data minimisation and security.

Equality, Diversity and Inclusion

The Trust is committed to embedding equality, diversity and inclusion in all its activities. CCTV systems are implemented and operated in a way that does not discriminate and that respects the dignity, privacy and rights of all individuals.

The impact of CCTV use on protected groups is considered as part of Equality Impact Assessments and Data Protection Impact Assessments.

Areas Covered

CCTV cameras may be installed in:

- External grounds, estate roads and pathways
- Communal entrances, exits and shared indoor spaces
- Administrative and operational offices
- Extra care communal facilities
- Café and publicly accessible areas

CCTV is **not** installed in private living accommodation or areas where individuals have a reasonable expectation of privacy, such as bathrooms, toilets or changing facilities.

Purpose of CCTV

CCTV is used for legitimate purposes including:

- Safeguarding residents, employees and visitors
- Preventing and detecting crime and anti-social behaviour
- Protecting Trust land, buildings and assets
- Supporting safeguarding investigations and disputes
- Assisting law enforcement, insurers and legal advisers where lawful

CCTV is **not** used for routine monitoring of employee performance.

Lawful Basis for Processing

CCTV footage is processed under:

- Legitimate interests (Article 6(1)(f) UK GDPR)
- Compliance with legal obligations
- Protection of vital interests in safeguarding situations

Data Protection Impact Assessments (DPIAs) are completed before installing new cameras, relocating equipment, or introducing new surveillance technologies.

Operation and Monitoring

- CCTV operates continuously or during defined hours depending on risk

- Camera positioning minimises unnecessary intrusion
- Live monitoring and playback is restricted to authorised employees
- All authorised users receive appropriate training

Audio recording is not used.

Retention, Storage and Security

- Footage is stored securely with restricted, logged access
- Footage is normally retained for **no longer than 60 days**
- Footage required for incidents, investigations or legal proceedings may be retained longer until the matter concludes
- All footage is deleted securely and irretrievably

Individual rights

Individuals may:

- Request access to footage in which they appear
- Raise concerns regarding CCTV use
- Request erasure where appropriate

Requests are handled by the Data Protection Officer within statutory timeframes. Images of third parties may be redacted where necessary.

Covert Monitoring

The Trust does **not** undertake covert monitoring.

Covert surveillance would only be considered in **exceptional circumstances** involving suspected serious criminal activity, where no less intrusive option exists, and only with:

- A completed DPIA
- Explicit Executive authorisation
- Involvement of the Data Protection Officer

Roles and Responsibilities

- **Board / Executive Team**: Oversight and assurance
- **Data Protection Officer**: Compliance, DPIAs, disclosures and DSARs
- **Operational Managers**: Day-to-day system oversight
- **All Employees**: Adherence and reporting concerns

Employees involved in managing and operating CCTV systems receive appropriate training on legal requirements, privacy, and data security. All employees must report any suspected breach of this policy or unauthorised access to CCTV footage immediately to the Data Protection Officer.

Failure to comply with this policy may result in disciplinary action.

Residents installing and operating domestic CCTV and smart camera doorbells

If a resident operates a domestic CCTV system or doorbell camera, under data protection law they are the controller of the data they collect. This means they own the video footage and are legally responsible for what happens to it and they must ensure that they comply with data protection regulations.

Automatic Number Plate Recognition (ANPR)

The Trust has a legitimate interest in utilising ANPR in providing security within the village which is utilised at the entrances to the village.

Complaints

Concerns regarding CCTV use should be raised with the Data Protection Officer using dpo@whiteleyvillage.org.uk. Unresolved matters may be referred to the Information Commissioner's Office.

Policy Review

This policy will be reviewed every two years, or sooner where there are changes in legislation, regulation, or organisational need.

Feedback is encouraged to ensure the policy remains effective and accessible.

Contact Information

For further information, access requests, or complaints regarding CCTV operations, please contact:

- **Data Protection Officer:** Veritau
- **Email:** dpo@whiteleyvillage.org.uk
- Complaints may also be escalated to the Information Commissioner's Office if unresolved using icocasework@ico.org.uk.

This policy is available to all employees, residents, and visitors upon request.