



POLICY CHANGE COVER PAGE

Policy Name:	CCTV Policy
Date of Change:	September 2026
Reasons for Changes:	Following the installation of a new CCTV system, the policy was reviewed and updated to ensure it remains current and compliant.
Summary of Changes:	• All references to Knowes HA changes to Knowes Housing Association Ltd • Wording revised throughout the policy to improve clarity and readability. • References to legislation and regulatory guidance updated, including the Data (Use and Access) Act 2025. • Lawful basis for processing CCTV data clarified. • Bullet points under Section 1.3 have been simplified as there was too much information/repetition. • Section 3 – wording has been simplified to suit a small office and car park CCTV system without being too technical. • Wording in Section 4.4 regarding monitoring updated to include that images will only be accessed where required for a legitimate purpose, such as the investigation of an incident. • Equality, Diversity and Inclusion section added and Equality Impact Assessment completed. • 'Document Owner' section removed. Please note that the policy was shared with the Data Protection Officer for comment.



POLICY NAME	CCTV POLICY
POLICY CATEGORY	GOVERNANCE
POLICY NUMBER	G38
DATE TO BOARD	OCTOBER 2026
PREVIOUS REVIEW	AUGUST 2022
NEXT REVIEW DATE	OCTOBER 2029
LINKS TO OTHER POLICIES	G15 DATA PROTECTION

1.Introduction

- 1.1 Knowes Housing Association Ltd operates CCTV and other forms of surveillance systems across our office premises and car park. We operate these systems to enhance security where we consider there to be a potential threat to the health, safety and wellbeing of our staff, visitors and members of the public. Furthermore, this surveillance assists in the prevention, deterrence and detection of crime, fly-tipping and anti-social behaviour, while providing vital evidence to mitigate risks on and around our office premises.
- 1.2 Knowes Housing Association Ltd recognises the responsibilities associated with the operation of surveillance systems and the rights and freedoms of individuals whose images may be captured. The Association is committed to ensuring that all surveillance systems are operated lawfully, fairly and transparently at all times. In doing so, it will comply with the requirements of the UK General Data Protection Regulations (the 'UK GDPR'), UK Data Protection Act 2018 (the 'DPA 2018') and the Data (Use and Access) Act 2025. The lawful basis for processing personal data through CCTV systems is Legitimate Interests, namely the protection of staff, visitors, property and assets and the prevention and detection of crime and anti-social behaviour. In developing this policy, Knowes Housing Association Ltd has taken account of the standards and good practice set out in the Information Commissioner's Office guidance, 'In the picture: A Data Protection Code of Practice for Surveillance Cameras and Personal Information', and the former Surveillance Camera Commissioner's guidance, 'A Guide to the 12 Principles'.
- 1.3 This policy sets out Knowes Housing Association Ltd's approach to the installation, management and operation of CCTV and other surveillance systems, and the handling of information obtained through those systems. It is based on the following principles:
 - CCTV systems will only be installed where there is a clear and justifiable need.
 - The privacy implications of CCTV will be considered before installation through a Data Protection Impact Assessment (DPIA)
 - Clear signage will be displayed where CCTV is in operation.
 - Appropriate arrangements will be in place for handling enquiries and complaints.
 - Access to CCTV images will be restricted to authorised individuals and information will only be disclosed where appropriate.
 - CCTV images will be retained only for as long as necessary and disposed of securely.
 - Appropriate measures will be in place to protect the security of CCTV systems and personal data.
 - CCTV systems will be operated lawfully, fairly and transparently and in accordance with relevant legislation and guidance.
 - This policy will be supported by procedures where necessary.

2. Decisions on Installing CCTV and Surveillance Systems

- 2.1 Knowes Housing Association Ltd recognises that using CCTV and other surveillance systems can be privacy intrusive. As such it will not install systems as a routine response to incidents of a criminal or anti-social nature. Notwithstanding this, we acknowledge the potential value of these systems as both a deterrent and a means of detection and will consider all potential installations on a case-by-case basis. In doing so the aim will be to demonstrate that installation is a justified, proportionate and effective solution to an identified problem or risk.
- 2.2 The impact on people's right to privacy and the availability of alternative and less intrusive options will be a key consideration. To this end, all potential installations will be subject to a Data Protection Impact Assessment (DPIA). All DPIAs will be conducted, recorded and signed off in accordance with our DPIA procedures. These have been developed in accordance with Information Commission's guidance and prescribe the approach to be followed in identifying and assessing data protection risks, and in consulting with those whose privacy is likely to be affected, where appropriate. Knowes Housing Association Ltd's Data Protection Officer will advise on and review DPIAs as required.
- 2.3 Knowes Housing Association Ltd will maintain a register of DPIAs as a record of decision making, installation authorisation and review. In the interests of transparency, the register and individual DPIAs may be made publicly available on request.

3. System Specification and Installation

- 3.1 Knowes Housing Association Ltd will ensure that CCTV systems are appropriately specified, installed and maintained to meet operational requirements and comply with relevant legal and data protection obligations. Cameras will be positioned to support the purpose for which they have been installed whilst respecting individuals' privacy as far as reasonably practicable.
- 3.2 Knowes Housing Association Ltd will engage suitably qualified contractors, in accordance with its procurement procedures, to install and maintain CCTV systems where required. Contractors will be expected to comply with relevant data protection and confidentiality requirements.

3.43.3. Knowes Housing Association Ltd will maintain a register of CCTV installations, including their location and installation date.

4. Access and Use of Images

- 4.1 Access to all equipment and images will be strictly controlled. Appropriate security measures will be in place to ensure entry to physical locations is limited to authorised personnel. As a general rule, such authorised personnel will be employees of Knowes Housing Association Ltd or individuals appointed by the Association, such as specialist contractors, acting under its explicit instruction. Knowes Housing Association Ltd will have in place a written data processing agreement with these contractors which is UK GDPR compliant and clearly defines obligations, responsibilities and liabilities.
- 4.2 The specialist contractors will be responsible for setting and maintaining relevant technical security controls for each system, including passwords or access codes and for maintaining physical and digital access logs.
- 4.3 Knowes Housing Association Ltd considers the following to be permitted reasons for monitoring:
- Prevention and detection of unacceptable behaviour, including aggressive or abusive actions, towards staff in Knowes Housing Association Ltd's premises;
 - Prevention and detection of unauthorised access to, or other criminal activity within, Knowes Housing Association Ltd's premises; and/or
 - General compliance with relevant legal obligations, regulatory requirements and Knowes Housing Association Ltd's policies and procedures.
- 4.4 Knowes Housing Association does not undertake routine monitoring of CCTV footage. Images will only be accessed where required for a legitimate purpose, such as the investigation of an incident.
- 4.5 Access to images will be on an as required basis and in accordance with the purpose for which the system was installed. This will only be carried out where an incident has been reported that requires investigation or where there is clear suspicion that an incident has taken place. Where it is required to access or download recorded images in order to investigate an alleged incident a data request, authorised by the Chief Executive Officer or such person to whom the decision may from time-to-time be delegated, this will be recorded in the CCTV Access Register or otherwise documented.
- 4.6 Access to images may also be required in order to respond to a Subject Access Request (SAR). All requests for system footage by individuals will be treated as SARs and handled in line with Knowes Housing Association Ltd's SAR Procedures. In doing so Knowes Housing Association Ltd acknowledges the requirement to balance the rights of data subjects against those of other individuals who appear in the requested images. On receipt of a SAR, arrangements will be made to retain, and prevent automatic deletion of, all images of the individual submitting the SAR that have been captured.
- 4.7 The general principle will be that requests for images will be authorised by

the Chief Executive Officer or such person to whom the decision may, from time to time, be delegated, at Knowes Housing Association Ltd. Images will be supplied direct to the person that authorised the request, and receipt will be logged in the CCTV Access Register or otherwise documented.

- 4.8 Disclosure of information from systems will be controlled and consistent with the purpose(s) for which the system was installed. As such disclosure is likely to be limited to law enforcement agencies or the Knowes Housing Association Ltd's legal advisers. The CCTV Access Register or other documentation will contain relevant details of image disclosure, including named recipient and reason for disclosure. Any disclosure of images must be done by secure means.
- 4.9 Knowes Housing Association Ltd will not routinely keep copies of images obtained through CCTV or other surveillance systems. Any images that are returned following disclosure will be disposed of securely in accordance with Knowes Housing Association Ltd's Data Retention Policy and Procedures.
- 4.10 Knowes Housing Association Ltd considers any attempted or actual misuse of CCTV or other surveillance systems or images by staff members to be a disciplinary matter, which will be handled in accordance with the relevant policy and procedures.
- 4.11 Knowes Housing Association Ltd will consider requests from Police and other legal authorities when suitable reasons have been given and that are in line with their obligations under the Investigatory Powers Act 2016. Such disclosure of information must follow our disclosure procedure.

5. Reviewing Installations

- 5.1 As a minimum, each system will be reviewed 6 months after initial installation and every 2 years thereafter to ensure its continued use serves a legitimate purpose and is required; and that the installation specification and design is appropriate to this purpose. This will involve a review and, as necessary, an update of the DPIA to reflect changes or actions required. Knowes Housing Association Ltd have implemented review procedures in the DPIA for CCTV imagery.
- 5.2 Where it is determined that a system is no longer needed, arrangements for decommissioning will be made promptly. This will involve removal of all cameras and associated equipment and signage in accordance with Knowes Housing Association Ltd's CCTV and surveillance system procedures.
- 5.3 Notwithstanding these regular reviews, Knowes Housing Association Ltd will separately instruct its contractors to undertake periodic maintenance and security checks. Any works to repair or replace system components, or to amend system configuration or design will be carried out only under

explicit instruction.

6. Privacy Information

- 6.1 Knowes Housing Association Ltd shall be as transparent as possible in its usage of CCTV and surveillance systems and Knowes Housing Association Ltd's Privacy Notices will reference the collection of personal data via systems. Clear and prominent signage will also be in place where systems are in operation. Signage requirements will be included as part of the standard system specification, and the appointed specialist contractors will be required to confirm these have been met as part of the installation process. In accordance with good practice these will state the general purpose for which the system is being used and contain relevant contact details where any enquiries should be directed. In this regard, complaints about implementation of or compliance with this Policy or the associated procedures, will be handled in accordance with Knowes Housing Association Ltd's Complaints Handling Procedure.
- 6.2 Knowes Housing Association Ltd acknowledges that individuals also have the right to complain to the Information Commission directly if they feel Knowes Housing Association Ltd is not operating CCTV and surveillance systems in accordance with the UK GDPR and/or DPA 2018.

7. Equality, Diversity and Inclusion

Knowes Housing Association Ltd is committed to ensuring that CCTV and surveillance systems are operated fairly, consistently and without discrimination. An Equality Impact Assessment has been carried out for this policy and no significant adverse impacts have been identified. Any equality implications arising from the operation of CCTV systems will be considered as part of future policy reviews.

8. Review

This policy will be reviewed every three years or sooner if required by changes in legislation or regulatory guidance.

Dated	23/09/2026
Approved By	Board
Review Date	3 years
Version	2