



Title: CCTV Policy
Lead: Communities Director
Originator: Community Safety & Emergency Response Manager
Approval body and date approved:- Policy Forum - September 2025
Date for review: September 2028

1. Introduction

Magenta Living is committed to ensuring the safety and security of its customers, staff, and assets. As part of this commitment, we operate a comprehensive Closed Circuit Television (CCTV) system, including a 24/7 Control Room that monitors our housing stock, communal areas, and several public spaces.

CCTV is installed and operated to help ensure the safety and security of our staff, residents, visitors, and property. The primary reasons for using CCTV include the prevention and detection of crime, supporting the effective management of incidents, and providing reassurance to the community.

CCTV footage may also be used to assist in investigations, support law enforcement agencies, and help resolve disputes. The use of CCTV is guided by a commitment to privacy, proportionality, and compliance with relevant legislation and best practice standards.

This document, along with the individual systems Codes of Practice, are designed to give clear guidelines on Magenta Living's use of CCTV and to protect it, and its CCTV operators, from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system.

This policy also covers the purchase and use of CCTV equipment and the gathering, storage, use and disposal of visual data. Whilst this policy is of particular relevance to staff working directly with the CCTV systems, the policy applies to all staff employed by Magenta Living as they may be required to view CCTV footage and this policy outlines the standard expected from any external agencies or persons who operate CCTV systems on its behalf.

Legislation

In addition to Magenta Living's existing policies, procedures, guidelines and Code of Practice, CCTV and its operation are subject to legislation under:

- UK GDPR and Data Protection Act 2018
- The Human Rights Act 1998 (HRA).
- The Regulation of Investigatory Powers Act 2000 (RIPA).
- The Protection of Freedoms Act 2012

The operation of all Magenta Living run CCTV systems will comply with these Acts, policies, procedures, guidelines and Codes of Practice. This is to ensure members of the public and Magenta Living itself are protected from abuses of the CCTV systems. The Emergency Response Team Leader will be responsible for reviewing all CCTV documentation relating to the system annually (or as changes occur) and ensuring the information in those documents is up to date. The Emergency Response Manager who acts as the Single Point of Contact (SPOC) will assist in this process.

2. Statement of Intent

It is important that everyone, and especially those charged with operating the CCTV systems on behalf of Magenta Living, understands exactly why each of the systems has been introduced and what the cameras will and will not be used for.

Each CCTV system has its own site or task specific objectives with the purpose of:

- Protecting areas and premises used by members of the public
- Deterring and detecting crime and anti-social behaviour on behalf of members of the public
- Assisting in the identification of offenders leading to their arrest and successful prosecution or other appropriate action
- Deterring violent or aggressive behaviour towards members of the public
- Reducing fear of crime, anti-social behaviour and aggression on behalf of members of the public
- Protecting property and assets owned by Magenta Living
- Providing evidence for grievance, formal complaints and Health and Safety Investigations.

The CCTV systems will not be used for any purpose other than those set out above, without prior consultation with the Communities Director, responsible for CCTV.

Cameras will not be used to monitor the progress of individuals in the ordinary course of their daily lives. Any other use of CCTV equipment requires approval from the Communities Director.

All requests to use CCTV other than for incidents that are historical will only be considered if RIPA (Regulation of Investigatory Powers Act 2000) is applied. Without such authorisation, CCTV will not be used under any circumstances.

3. Policy

3.1 Overall Responsibility

The Communities Director has overall responsibility for CCTV systems within Magenta Living. Close supervision of CCTV monitoring procedures rests with the Community Safety & Emergency Response Manager.

3.2 Management Responsibility

The Emergency Response Team Leader is responsible for ensuring all users are kept up to date on legislation and changes in procedures. Magenta Living's Code of Practice document will be reviewed annually and a central database of all documents relating to Magenta Living's CCTV system will be maintained.

The Emergency Response Team Leader is responsible for the day-to-day operation of the CCTV system and the security and accountability of all equipment and media used by their system.

They will ensure that authorised staff using the CCTV system are properly trained in the use of the equipment and comply with the Code of Practice and policies and procedures. No permission will be given for any other staff to operate the equipment or view images without authorisation from the Head of Customer Access.

The Community Safety & Emergency Response Manager will act as the first point of contact for enquires, complaints and requests for evidence and as the liaison officer for all external and internal contacts.

The Community Safety & Emergency Response Manager will signpost any safeguarding or other tenancy concern matters to the relevant Magenta Living teams.

3.3 CCTV Staff Operating CCTV Systems

Staff operating CCTV systems are responsible for operating the equipment in accordance with requirements set out in current legislation, this policy document, guidelines, confidentiality certificates, Codes of Practice and local operational manuals.

All CCTV operators will receive training to ensure that they are suitably qualified to legally operate CCTV systems. This includes Public Space Surveillance training which qualifies them to be licensed appropriately by the Security Industry Authority (SIA).

3.4 Monitoring of Magenta Living staff

Magenta Living does not routinely use CCTV to record colleagues working normally as part of their day-to-day employment. Managers are not permitted to use the cameras to observe staff working practices, nor to assist them in the day-to-day management of their staff.

Individuals will only be monitored if there is reasonable ground to suspect a criminal offence or breach of policy and/or procedure, potentially amounting to misconduct/gross misconduct is being committed. Additionally, there may be circumstances where normal monitoring and recording “incidentally” captures evidence of actions by Magenta Living staff which may constitute a breach of policy and / or procedure. In either case where CCTV has recorded such incidents, (and officers wish to use footage as part of any investigation) officers should consult the People Team and where appropriate Trades Unions.

3.5. Purchase and Deployment of CCTV Cameras

Magenta Living is committed to respecting people’s rights to privacy and support an individual’s entitlement to go about their lawful business. This is a primary consideration in the operation of any CCTV system, although there will inevitably be some loss of privacy when CCTV cameras are installed.

Magenta will give serious consideration to the necessity for cameras in a given location and their impact on the privacy of individuals using the areas where cameras are to be installed.

If CCTV cameras are required, they will be installed with privacy zones whenever required, which block out private areas so that they cannot be viewed or recorded.

Covert cameras will not be deployed into areas used by members of the public. Cameras will be clearly visible and clearly signed.

Where covert cameras have been authorised for deployment in private areas, Regulation of Investigatory Powers Act 2000 (RIPA) will be complied with. Signage will not be displayed.

Concealed and unsigned cameras within properties may be deployed in areas of high security where there is no legitimate public access and where staff access is controlled and restricted. Staff who work in these areas will be informed of the location of these cameras, their purpose and where the monitor is kept.

Magenta Living will not use CCTV cameras if there are less intrusive and more effective methods of dealing with the problem.

No individual department or service area will be permitted to purchase or install CCTV cameras until a full Operational Assessment and Privacy Impact Assessment have been completed and presented to the Communities Director and Data Protection Officer for approval.

It is a requirement under the Surveillance Camera Code of Practice and the National CCTV Strategy that any equipment purchased is fit for purpose and will meet the objectives set down for the scheme. There is also a clear requirement for all CCTV schemes to have an effective maintenance schedule and Code of Practice. Officers purchasing new CCTV equipment will ensure these requirements are met.

Recordings are retained for 28 days in line with our Data Retention guidelines.

3.6 Remote re-deployable cameras

Magenta Living's Neighbourhood Management Team and Emergency Response Team install remote re-deployable cameras in areas where they believe it is justifiable and proportionate to remotely monitor behaviours in relation to Anti-Social Behaviour or Fly Tipping. These cameras can be viewed via a mobile app or tablet.

The cameras will only remain in place for as long as is reasonably necessary and will only be viewed by trained staff members, responsible for this area. Neighbourhood Housing Officers will only view footage when an incident is reported to them and are not permitted to monitor the camera remotely, without prior agreement from their line manager.

All Neighbourhood Officers and Community Safety Officers receive in-house training to ensure that they are suitably qualified to legally monitor CCTV images following report of an incident. This training is carried out by individuals who possess SIA Licences (CCTV – Public Space Surveillance).

Wherever remote re-deployable cameras are fitted, signage is displayed informing individuals of the camera's presence and contact details.

3.7 Use of Video Doorbells

Video doorbells e.g. Ring Doorbells are becoming increasingly popular among Magenta Living tenants looking to enhance personal security. Whilst we recognise the benefits these devices can offer, we also acknowledge the need to balance individual security with the privacy rights of others and compliance with relevant legislation, including the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

Permitted Use

Tenants may install video doorbells on properties without shared access points, such as standalone houses or bungalows, provided that:

- The device is positioned in a way that only captures footage of the tenant's own property and immediate entrance area.
- The field of view does not include public pathways, neighbouring properties, or areas used by others, unless absolutely necessary and proportionate.
- The tenant ensures that the use of the device complies with data protection laws, including informing visitors that recording is taking place (e.g., through signage).
- The device is not used to record audio continuously or indiscriminately.

Prohibited Use

Video doorbells are **not permitted** in any location where their use would result in the recording of shared communal areas, such as:

- Low-rise and high-rise buildings with shared entrances, corridors, stairwells, or outdoor communal spaces.
- Maisonettes or flats with shared access points or walkways.

This restriction is in place to protect the privacy of other residents who may be recorded going about their daily lives, which could constitute a breach of data protection legislation and Magenta Livings duty to safeguard tenant privacy.

The only exception to this applies when a partner agency, such as the Police or Social Services, identifies and declares a significant safeguarding risk to a tenant.

Responsibilities of Tenants

Tenants who install Ring doorbells are responsible for:

- Ensuring the device is used lawfully and respectfully.
- Responding to any complaints or concerns raised by neighbours or by Magenta Living.
- Removing or repositioning the device if it is found to be in breach of this policy.

Failure to comply with this section may result in Magenta Living requiring the removal of the device and taking further action where necessary.

3.8 Customer Hub

CCTV monitors sited in the Customer Hub at Partnership Building provide live monitoring of the Customer Hub area by the CCTV Control Room. It is the

responsibility of the Emergency Response Team Leader to ensure those observing the monitors are properly trained in their duties and responsibilities and that the ability to view the monitors is restricted to those authorised.

3.9 Viewing Images and the Provision of Evidence

The casual viewing or trawling of images is strictly forbidden. Viewings will only be undertaken for a specific, legitimate and documented purpose.

Monitoring of other cameras where required will only be carried out by persons authorised by the Community Safety & Emergency Response Manager.

The provision of evidence or viewings will only be actioned from the Police, other enforcement agency requests or another department conducting an investigation into criminal activities, potential disciplinary matters, complaints, grievance or health and safety issues.

The Police have a legal requirement to 'seize' any relevant evidence when investigating a crime and the Community Safety & Emergency Response Manager must comply with their request. The enforcement agencies are required to submit written requests.

Magenta Living and Merseyside Police have a signed, legal document which is an information sharing agreement. Additionally, all Merseyside Police staff and Magenta Living employees who enter the CCTV Control Room have been subjected to enhanced DBS screening. Police Officers and Police Community Support Officers are allowed to view CCTV images in 'real time' if it is for a specific Policing purpose in order to allow for a prompt investigation.

Staff viewings will be permitted, but images will only be released to a properly authorised investigating officer after they have submitted a formal request to the Departmental Director.

Where it is decided that CCTV images will be used as part of an investigation staff will be given a copy. All staff images will be retained in an evidence locker located within the CCTV software.

Magenta Living will not permit viewings or release images to people being investigated by an enforcement agency or in an internal investigation, which may be handed over to an external agency such as the Police. The responsibility for investigating and disclosing images to those involved in the investigation are covered by the Police and Criminal Evidence Act (PACE) and the Evidence and Disclosure Act and the prosecuting authorities are required to follow the procedures set out in these Acts. It should be noted that other enforcement agencies will operate under other legislation but the use of and disclosure of the evidence rests with them.

It is critical that a full and detailed record is kept of all viewings of the systems and all instances when images are issued. This information will be recorded on the Magenta Living CCTV software (View Scape) and must include:

- Date, time, camera number and location of the incident
- The name of the authorising officer
- The date, time, name and contact details of the person viewing or removing images
- The reason for the viewing/ issue of images
- The person who released and the received the images signatures
- Any media containing images should be uniquely marked and the number recorded for ease of identification

3.10 Signage

All areas where CCTV is in use will be clearly signed to comply with the General Data Protection Regulation. This is to warn people that they are about to enter an area covered by CCTV cameras or to remind them that they are still in an area covered by CCTV. The signs will also act as an additional deterrent. CCTV signs will not be displayed in areas, which do not have CCTV cameras.

The signs must have a yellow background with all writing in clear black print. The sign must carry the CCTV camera and organisations name. The information on the sign must explain why the CCTV cameras are there, who manages them and a contact number. The signs, position and the message need to be big enough to enable people to easily read the information on it. For pedestrians the sign should be A4 size, for lifts A5 size and for vehicle access A3 size.

3.11. Data Subjects' Rights

Where recorded CCTV images contain images where it is possible to identify individual persons, those persons (Data Subjects) have rights under UK GDPR and Data Protection Act 2018. Magenta Living will operate under the terms of the GDPR Act at all times.

Magenta Living will respect the rights of Data Subjects including (where applicable):

1. the right to be informed
2. the right of access (Subject Access Request)
3. the right of rectification if data is incorrect
4. the right to erasure (right to be forgotten)
5. the right to restrict processing
6. the right to object to processing (e.g., marketing)
7. the right not to be subject to automated decision making
8. the right of data portability

Not all of these rights are mandatory; most are only applicable in certain circumstances. Should a Data Subject notify Magenta Living of their desire to exercise any of these rights, colleagues must seek the advice of Magenta Living's Data Protection Officer before responding.

3.12 Requests for Information (Subject Access Requests)

There will be circumstances where customers and/or other stakeholders request copies of CCTV recordings. Colleagues should treat all of these requests as a "Subject Access Request" and following Magenta Living's procedures for dealing with these. In all instances where Subject Access Requests are received, they should be passed onto Magenta Living's Data Protection Officer (DPO) for logging and validating, before CCTV images are released.

There are certain circumstances when it will not be possible to provide images from CCTV - for example, when the images form part of a criminal investigation (in these circumstances such footage will only be provided to the Police).

3.13 Recording Systems

All staff required to operate CCTV equipment are to receive training in the use of the equipment and must conform to this policy document and their systems Code of Practice. Staff who operate the recorders will be required to sign a 'confidentiality statement', which prohibits them from making any material available for purposes other than those stated in the Code of Practice. All staff having access to the equipment will also sign a confidentiality statement. Once signed, the confidentiality statement should be placed in the individual's personnel file.

Except for evidential purposes images will not be copied in whole or in part.

Recorded material will not be sold or used for commercial purposes or the provision of entertainment. Images provided to the police or other enforcement agencies or for internal investigations shall at no time be used for anything other than the purposes for which they were originally released.

Recording equipment and recording media will be kept in a secure location and no access will be granted to unauthorised staff.

All images will remain the property and copyright of Magenta Living.

Each new recording media must be clearly marked with a unique reference number in indelible ink before it is brought into operation.

Each use of media will be documented. Unused media or media awaiting issue will be held in a secure cabinet in such a way that completeness of the archive is immediately apparent. The CCTV register will be stored in a secure place.

All media will be retained and disposed of securely in line with Magenta Livings Corporate Retention and Disposal Schedule.

3.14 Disciplinary Offences and Security

Tampering with or misuse of cameras, monitoring or recording equipment, images or recorded data by staff is strictly forbidden and may be regarded as misconduct/gross misconduct which could lead to disciplinary action, which may result in dismissal or criminal prosecution.

Any breach of this policy document or the CCTV Code of Practice will be regarded as a serious matter. Staff who are in breach of these instructions will be dealt with according to Magenta Living disciplinary procedures.

The responsibility for guaranteeing the security and proper use of the system will rest with the Emergency Response Manager. They will, in the first instance, investigate all breaches or allegations of breaches of security or misuse and will report his/her findings to their Head of Service or Assistant Director and Director.

3.15 Inspections/ Visits

All CCTV system may be subject to inspections or visits by a member of the Information Commissioners Office or the Regulation of Investigatory Powers Commissioner. In addition, systems may also be subject to visits/ inspections by internal auditors appointed by Magenta Living.

3.16. Health and Safety

The Emergency Response Team Leader is to ensure that staff are made aware of and comply with all Magenta Living policies on health and safety. In particular they are to be aware of policies relating to working with electrical equipment and VDU Regulations.

3.17. Complaints

Complaints about the operation of a CCTV system should be addressed initially to YourVoice@magentaliving.org.uk. Complaints will be dealt with in accordance with Magenta Living's complaints procedure.

3.18 Further Advice/ Information

Further advice on CCTV related matters may be obtained from the individuals and organisations shown below:

Community Safety & Emergency Response Manager
Partnership Building
Hamilton Street
Birkenhead,
Wirral

CH41 5AA

Tel: 0808 100 9596

E-mail contactus@magentaliving.org.uk

4. Implementation

The policy will be effective from October 2025. Staff will be made aware of the policy through publication on the Magenta Living intranet, INSITE. The policy will also be uploaded to the Magenta Living web site.

5. Consultation

Confirmed by Interim Customer Director that the policy does not require customer consultation.

Policy Forum review took place on 16.09.2025

6. Equality Analysis (EA)

We believe all people should be treated with dignity and respect regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including, nationality, ethnic or national origins), religion, belief or non-belief, sex, or sexuality or by association with someone with any of these characteristics or perception of having any of these characteristics.

The Equality analysis was undertaken on 16.09.2025

7. Monitoring Performance

This policy's effectiveness will be measured using the following performance indicators:

- CCTV Incident Reports generated,
- Police or Housing related interventions,
- Benchmarking against similar organisations via The CCTV User Group
- Stakeholder feedback.

8. Scheme of Delegation

The responsible authority for approving this policy is the Executive Team.

The Responsible Director for formulating this policy and ensuring its effective implementation is Communities Director.

The Responsible officer for reviewing and monitoring the implementation and performance against this policy is the Community Safety & Emergency Response Manager.

9. Policy Review

The policy will be reviewed every 3 years or earlier if deemed necessary through the performance monitoring process.

10. Amendment Log

Date of revision:	Record of amendments:	Reason for revision:
16.09.2025	Only changes required was the amendment of internal role titles.	3 year review