

Loreburn Group

# CCTV Policy



**Creating Great Places to Live**

<b>Policy</b>	CCTV Policy							
<b>Version Reference</b>	2							
<b>Approved by</b>	MC		LET			MT		X
<b>Date of Approval</b>	August 2020							
<b>Review Period</b>	Every 3 Years <b>or</b> as legislation or substantive changes occur							
<b>Review Due</b>	August 2023							
<b>Policy Champion</b>	Head of Housing							
<b>Who this policy affects</b>	Staff	x	Customers	x	Contractors	x	Members of the Public	x
<b>Where this policy affects</b>	General needs	x	Sheltered	x	Supported	x	Offices/staff base	x

## 1. PURPOSE OF THIS POLICY

- 1.1 The purpose of this policy is to regulate the use of Closed-Circuit Television (CCTV) and its associated technology in the monitoring of both the internal and external environments at ~~the premises under the remit of Hope Place and Reston~~ the under noted locations:
- Block 1, Barnraws, Dumfries
  - Hope Place, Dumfries
  - J M Barrie House, Dumfries
  - Ladys Well, Dumfries
  - Millburn Court, Stranraer
  - 1-51 Nithsdale Mills, Dumfries
  - Gifhorn House, Dumfries
  - Stevenson Court, Sanquhar
- 1.2 New CCTV systems will be introduced in consultation with customers, staff and management committee. Where systems are already in operation, their operation will be reviewed regularly in consultation with customers, staff, and management committee.
- 1.3 CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and equipment as well as offering peace of mind among the occupants, that a surveillance security system is in operation within and/or in the external vicinities of the premises during both the daylight and night hours each day.
- 1.4 CCTV surveillance is intended for the purposes of:
- protecting the buildings and assets, both during and after working hours;
  - promoting the health and safety of staff, customers and visitors;
  - reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
  - supporting the Police in a bid to deter and detect crime;
  - assisting in identifying, apprehending and prosecuting offenders; and in the case of our young person's supported accommodation,
  - ensuring that the project rules are respected so that the accommodation can be properly managed.
- 1.5 This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where activities are carried out in the premises, Loreburn Housing Association will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.
- 1.6 This Policy is supported by the CCTV Procedural Guide.

## **2. Associated Policies**

2.1 This policy should be read in conjunction with:

- Anti-social Behaviour Policy
- Complaints Policy
- Freedom of Information Policy
- Insurance Policy
- Health and Safety Policy
- Estate Management
- Privacy Policy
- Risk Management Policy

## **3. LEGISLATIVE BACKGROUND**

- 3.1 Loreburn Housing Association as the corporate body has a statutory responsibility for the protection of its property, equipment and other assets as well as providing a sense of security to its employees, customers, and invitees to its premises. Loreburn Housing Association owes a duty of care under the provisions of Health and Safety at Work etc Act 1974 and associated legislation and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of ensuring that best practices governing the public and private surveillance of its premises.
- 3.2 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.
- 3.3 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Loreburn Housing Association, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other related legislation.
- 3.4 This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.
- 3.5 Video monitoring of public areas for security purposes within the premises is limited to uses that do not violate the individual's reasonable expectation to privacy.
- 3.6 Information which is obtained by Loreburn in violation of this policy may not be used in a disciplinary proceeding against an employee of the Association or a customer within the accommodation.

3.7 All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Loreburn Housing Association. Recognisable images captured by CCTV systems are “personal data.” They are therefore subject to the provisions of the General Data Protection Regulation 2016/679.

### 3.8 JUSTIFICATION FOR USE OF CCTV

3.9 GDPR requires that personal data is processed lawfully, fairly and in a transparent manner. This means that Loreburn Housing Association needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV to control the perimeter of the buildings for security purposes has been deemed to be justified by the board of management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

3.10 In other areas of the buildings where CCTV has been installed, e.g. hallways, stairwells, kitchens, the Association has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system.

3.11 CCTV recordings will only be made and used where there is a lawful basis for doing so in terms of GDPR Articles 6 and 9.

### 4.1. Location of Cameras

4.2 The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Loreburn Housing Association has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. CCTV Video Monitoring and Recording of Public Areas may include the following:

- **Protection of buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- **Video Patrol of Public Areas:** Parking areas, Main entrance/exit gates, Traffic Control
- **Criminal Investigations (carried out by Police):** Robbery, burglary and theft surveillance

## 5. Request from Customers

- 5.1 Our policy in relation to requests from our customers to install CCTV cameras is to consider these requests on a case by case basis and to take into account the views and feelings of all the neighbours, or others, who may be affected before making a decision on whether permission should be granted. Loreburn Housing Association has absolute discretion in granting, refusing and revoking permission for the installation of CCTV cameras.
- 5.2 Customers who intend to affix an external viewing CCTV camera to the property must apply to Loreburn HA for permission, before installation. The CCTV camera must capture images of the customer's property only, for example anything in the curtilage of their property or their car parked on the street. It must not be viewing or monitoring any other properties. The CCTV camera must not be installed until permission has been given.
- 5.3 Permission will only be granted where the CCTV camera will only capture images within the curtilage of the customer's property. A member of staff will visit the applicant on receipt of request to install CCTV to check the final positioning and reasons for the installation.
- 5.4 There may be some cases where it is not possible to site the camera without the CCTV camera capturing images of parts of a neighbouring property. In such cases Loreburn HA staff will consult with affected neighbours.
- 5.5 If neighbour/s object to the siting of the CCTV cameras, it is likely permission will be refused.
- 5.6 Loreburn HA reserves the right to check the angle of the CCTV camera once it has been installed. Loreburn HA will not view general footage or get involved in decisions about the processing of data, captured by CCTV installed by a customer. Any customer who installs CCTV will be responsible for ensuring their own compliance with data protection law.
- 5.7 While Loreburn HA may permit the installation of CCTV cameras, each customer who does so must satisfy themselves that any processing of personal data carried out is in accordance with Data Protection Legislation. **Loreburn HA shall have no liability to customers in this respect.**
- 5.8 Should CCTV be moved, or become the implicated reason in a neighbour dispute, a complaint, or an allegation of harassment, then Loreburn HA reserves the right to withdraw permission and to require that the cameras be removed.

## 6. Legislation Governing Domestic CCTV

- 6.1 Persons using CCTV installations at domestic premises do not require to pay a fee to the Information Commissioner, but they must still comply with Data

Protection Legislation. Customers do not need to register the CCTV system with the Police, but they will note one is present if the customer wishes.

- 6.2 There is a requirement to keep records of recordings and place appropriate signage around the premises where CCTV is being used. To comply with the Data Protection legislation, they should contain information about the purpose of the system, the Data Controller, and their contact details.
- 6.3 Under Data Protection legislation and Human Rights legislation, every effort must be made to ensure that 'collateral intrusion' of adjacent premises or Public areas are minimised. This may require the camera to be placed and angled in such a way to ensure that adjacent premises do not appear on the 'on screen' image.

## **7. COVERT SURVEILLANCE**

- 7.1 Loreburn Housing Association will not engage in covert surveillance.
- 7.2 Where the Police request to carry out covert surveillance on the premises, such covert surveillance may require the consent of a judge. Accordingly, any such request made by the Police will be requested in writing and the Association will seek legal advice.
- 7.3 Permission must not be granted until the request has been reviewed and approved by the Director of Housing or in their absence, the Chief Executive.

## **8. NOTIFICATION – SIGNAGE**

- 8.1 The Association will provide a copy of this CCTV Policy on request to staff, customers and visitors to the accommodation. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. The location of CCTV cameras will also be indicated to the Management Committee and to the CEO.
- 8.2 Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Loreburn Housing Association property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



### **WARNING CCTV cameras in operation**

**Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour for the safety of our staff and customers and for the protection of Loreburn Housing Association and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the Police. This scheme is controlled by Loreburn Housing Association. For more information contact (01387) 321...**

8.3 Appropriate locations for signage will include:

- at entrances to premises i.e. external doors
- reception area
- at or close to each internal camera

## **9. Storage & Retention**

9.1 GDPR states that data shall be kept “for no longer than is necessary for the purposes for which the personal data are processed”. A data controller needs to be able to justify this retention period. Loreburn HA will not generally retain CCTV footage for longer than a month (28 days), except where the images identify an issue – such as a break-in or theft and those images or recordings are retained specifically in the context of an investigation/claim/prosecution of that issue.

9.2 Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/claim/prosecution of that issue.

9.3 The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Head of Housing. The Head of Housing may delegate the administration of the CCTV System to another staff member.



## 10. Access

10.1 Access to the CCTV system and stored images will be restricted to authorised personnel only. In relevant circumstances, CCTV footage may be shared with third parties including:

- The Police where Loreburn Housing Association (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Loreburn Housing Association property, or
- The HSE and/or any other statutory body charged with adult or child safeguarding; or
- To assist the Head of Housing or investigator in establishing facts in cases of unacceptable behaviour; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Loreburn Housing Association or
- To individuals (or their legal representatives) subject to a court order.
- To the Association's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

10.2 Where CCTV images are shared with any third parties, Loreburn Housing Association will first establish that there is a lawful basis for the sharing.

10.3 Any USB sticks or other devices used for storing recorded footage and the monitoring equipment will be securely stored in a restricted area.

10.4 Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

10.5 A log of access to USB sticks/images will be maintained as required.

10.6 **Requests by the Police:** Information obtained through video monitoring will only be released when authorised by the Head of Housing. If the Police request CCTV images for a specific investigation, the Police may require a warrant and accordingly any such request made by the Police should be made in writing and the Association should immediately seek legal advice.

- 10.7 **Access requests:** In terms of the Data Protection Act 2018, on written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release.
- 10.8 Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable, where the other individual consents or where it is reasonable in all the circumstances to disclose the images. To exercise their right of access, a data subject should make an application to the Head of Governance and Assurance. However, subject access requests received by any member of staff are valid and must also be forwarded to the Head of Governance and Assurance as soon as possible.
- 10.9 No fee may be charged for providing data or responding to a request save where it can be demonstrated that the request is manifestly unfounded or excessive. A response must be provided to the request within one month of the date of receipt of the request.
- 10.10 Where possible, a person should provide all the necessary information to assist Loreburn Housing Association in locating the CCTV recorded data, such as the date, time and location of the recording but a request cannot be refused simply because this information is not provided. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the Association.
- 10.11 In giving a person a copy of their data, the Association may provide a still/series of still pictures, or a USB stick with relevant images. However, other images of other individuals will be obscured before the data is released. Where a request is made in electronic form, a response will be issued in electronic form unless the requester specifies otherwise.
- 10.12 From 11<sup>th</sup> November 2019, registered social landlords and their subsidiaries are considered to be public authorities for the purposes of providing housing services and for the supply of information to the Scottish Housing Regulator. As such Loreburn Housing Association is subject to the Freedom of Information (Scotland) Act 2002 (“FOISA”). Individuals, corporate entities and organisations may make a request for CCTV footage in terms of FOISA.
- 10.13 Any request for information under FOISA should be forwarded to the **Head of Governance and Assurance** as soon as possible following receipt. Certain information requested, including CCTV footage may be exempt from disclosure and each request will be considered in order to assess whether the

information should be provided to the requester. A response must be issued to the party making the request on receipt of the request within the time period laid out in the CCTV Procedure Guide. A fee may be charged for providing information and will be calculated in accordance with the provisions of FOISA and the associated fees regulations.

## **11. SECURITY COMPANIES**

- 11.1 Where the CCTV system is controlled by a security company contracted by the Association the following applies:
- 11.2 The Association has a written contract with the security company in place which details the areas to be monitored, how long data is to be stored, what the security company may do with the data, what security standards should be in place and what verification procedures apply. The written contract also states that the security company will process the recorded images only in accordance with Loreburn Housing Association's written instructions and in accordance with Data Protection Legislation.
- 11.3 Security companies that place and operate cameras on behalf of clients are considered to be "Data Processors." As data processors, they operate under the instruction of data controllers (their clients). Data Protection Legislation places a number of obligations on data processors. These include having appropriate security measures in place to prevent unauthorised access to, or unauthorised alteration, disclosure or destruction of, the data, in particular where the processing involves the transmission of data over a network and against all unlawful forms of processing. This obligation can be met by having appropriate access controls to image storage or having robust encryption where remote access to live recording is permitted. Staff of the security company have been made aware of their obligations relating to the security of data.

## **12. Service and Maintenance of Equipment**

- 12.1 A CCTV service and maintenance contract in place and CCTV systems will be serviced twice per annum in accordance to BS62676.
- 12.2 This contract is managed by the Assistant Manager – Compliance and Projects.

## **13. Implementation & Review**

- 13.1 The Policy Champion is the Head of Housing. This policy will be reviewed and evaluated annually by the Policy Champion. On-going review and evaluation will take cognisance of changing information or guidelines (e.g. from the Information Commissioner, the Police, Audit units (internal and external) national management bodies, legislation and feedback from customers, staff and others.

## 14. Complaints

- 14.1 Loreburn has a commitment to valuing complaints and ensures the organisation benefits from feedback to identify areas for change or improvement.
- 14.2 Loreburn has a Complaints Policy which ensures there are robust and effective procedures in place for complaints to be properly managed and acted upon.
- 14.3 Anyone dissatisfied with the outcome of their complaint having exhausted Loreburn's complaints procedure has the right to refer the matter to the Scottish Public Services Ombudsman.

## 15. Equality, Diversity & Inclusion

- 15.1 Loreburn aims to ensure that equality, fairness, dignity and respect are central to the way we work and how we treat our customers. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.
- 15.2 Loreburn will not discriminate against customers, staff, visitors, suppliers or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

## 16. Risk Management

- 16.1 Loreburn has a Risk Management Strategy, Policy and Procedure. These documents set out how the organisation will manage risk as an integral part of its governance and management systems, ensuring risks are identified, evaluated and controlled effectively.
- 16.2 Identifiable risks arising from this policy will be monitored and managed by the internal processes set out herein and by regular review of this and all other associated policies and procedures, ensuring risks are mitigated and Loreburn complies with all legislative requirements and regulatory and best practice guidance.

## 17. Responsibilities Chart

- 17.1 The below chart illustrates the responsibilities of all staff pertaining to this policy:

Responsibilities	CEO/ MC	LET	Head of Housing	Assistant Mgr - Compliance	All Staff
Ensuring managers implement and monitor the application of this policy and ensure the policy is communicated to all staff.		✓	✓		

Sufficient resources are made available to enable compliance with this policy.		✓			
Ensure all equipment provided for control and monitoring premise and property is maintained in accordance with manufacturer's recommendations and good practice				✓	
Report any defects, errors or omissions in the procedure or equipment.					✓
Report any data breaches or inappropriate use of CCTV systems					✓
Ensure appropriate use and understanding of requirements and responsibilities by third party operators such as security companies			✓		
Respond and/or approve requests from Police to use surveillance or covert CCTV to monitor an individual's activity (may or may not be a Loreburn customer)		✓			

## 18. Policy Review

### 18.1 The Policy Champion is the Head of Housing.

The Policy Champion is responsible for completing the Health and Safety Assessment and Equality, Diversity and Inclusion Assessment Checklist.

This policy will be reviewed by the Policy Champion every 3 years or sooner as required due to legislative or substantive change.

## Policy Assessment Checklist

### Health & Safety Assessment

**Does this policy have the potential to affect:**

Lone Working	No
Safety and/or wellbeing of customers	No
<b>Have the above items been considered in the preparation of this policy?</b>	<b>Yes</b>

**Comments:**

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing the safety and security of the building and its associated equipment as well as offering peace of mind among the occupants that a surveillance security system is in operation within and/or in the external areas of the premises during both the daylight and night hours each day.

### Equality, Diversity & Inclusion Assessment

**Does this policy have the potential to affect:**

Staff's rights to equal opportunities	No
Customer's rights to equal opportunities	No
Customer's ability to access to homes and/or services	No
<b>Have the above items been considered in the preparation of this policy?</b>	<b>Yes</b>

**Comments:**

### Agile Working Assessment

**Agile working requirements have been considered and addressed in the preparation of this policy:** Yes

## **APPENDIX 1 – DEFINITIONS**

### **Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;**

**CCTV** – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

**The Data Protection Act** – The Data Protection Act confer rights on individuals as well as responsibilities on those persons handling, processing, managing and controlling personal data. All school/ETB staff must comply with the provisions of the Data Protection Act when collecting and storing personal information. This applies to personal information relating both to employees of the organisation and individuals who interact with the organisation.

**Data** - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

**Personal Data** – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.

**Access Request** – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Act.

**Data Processing** - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

**Data Subject** – an individual who is the subject of personal data.

**Data Controller** - a person who (either alone or with others) controls the contents and use of personal data.

**Data Processor** - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Act places responsibilities on such entities in relation to their processing of the data.

## **APPENDIX 2 - PRIVACY IMPACT ASSESSMENT**

Before the Association installs a new CCTV system, it is recommended that a documented privacy impact assessment is carried out.

By properly conducting such an assessment is less likely to introduce a system that contravenes the provisions of the Data Protection Act. This is an important procedure to adopt as a contravention may result in action being taken against an Association by the Office of the Data Protection Commissioner or may expose an Association to a claim for damages from a customer. Some of the points that might be included in a Privacy Impact Assessment are:

- What is the Association's purpose for using CCTV images? What are the issues/problems it is meant to address?
- Is the system necessary to address a pressing need, such as staff and student safety or crime prevention?
- Are the CCTV cameras intended to operate on the outside of the premises only?
- Is it justified under the circumstances?
- Is it proportionate to the problem it is designed to deal with?
- Is it intended that CCTV cameras will operate inside of the building?
- Are internal CCTV cameras justified under the circumstances?
- Are internal CCTV cameras proportionate to the problem they are designed to deal with?
- What are the benefits to be gained from its use?
- Can CCTV systems realistically deliver these benefits? Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?
- Do the Association need images of identifiable individuals, or could the system use other images which are not capable of identifying the individual?
- Will the system being considered deliver the desired benefits now and remain suitable in the future?
- What future demands may arise for wider use of images and how will they be addressed?
- Is the Association, the data controller for the entire CCTV system?
- Where a management company is in place, is the Association satisfied that it complies with the Data Protection Act with regards to the processing of images of staff, customers and visitors to your accommodation captured on any CCTV systems under its management?
- What are the views of those who will be under CCTV surveillance?
- What could be done to minimise intrusion for those whose images may be captured, particularly if specific concerns have been expressed?
- How have staff, customers and visitors been assured by the Association that they will not be monitored, and that the CCTV system will be used only for the stated purposes?
- Does the Association's policy on the use of CCTV make it clear that staff will not be monitored for performance or conduct purposes?



- Have the views of staff & customers regarding the location of cameras been considered?
- Can the location of each internal camera be justified in accordance with the overall purpose for the use of the CCTV system?
- Has appropriate signage been erected at the location of each internal camera indicating that recording is taking place and outlining the purpose of such recording?
- Who will have access to the system and recordings/images?
- What security measures are in place to protect the CCTV system and recordings/images?
- Are those who will have authorised access to the system and recordings/images clear about their responsibilities?
- Are the camera monitors kept out of view of staff, customers and visitors and is access to the camera monitors restricted to a limited number of staff on a 'need to know' basis?
- Is the room(s) which houses the camera monitors and the CCTV system securely locked when unattended?
- Does the Association have a procedure in place to ensure that recordings/images are erased or deleted as soon as the retention period (28 days) has expired?
- Does the Association have a procedure in place for handling requests for access to recordings/images from the Police?
- Will appropriate notices be in place to ensure that individuals know that they are being monitored?
- Does the Association have a data protection policy? Has it been updated to take account of the introduction of a CCTV system?
- Does the Association have a procedure in place to handle access requests seeking a copy of images recorded by the CCTV system (within the statutory timeframe of forty days)?
- Has the right of access been communicated to staff, customers and visitors?
- Has the Association communicated its policy on the use of CCTV to staff, customers and visitors and how has this been done?
- How are new customers and new staff informed of the Association's policy on the use of CCTV?