

JL Homes Enterprises

CCTV Policy

Effective Date: 1st May 2025

Review Date: 1st May 2026

1. Policy Statement

JL Homes Enterprises (“the Company”) is committed to protecting the privacy and safety of all individuals within its premises. This policy outlines the lawful and responsible use of Closed-Circuit Television (CCTV) systems to safeguard service users, staff, visitors, and property at all JL Homes sites.

2. Purpose of CCTV

CCTV is installed for the following purposes:

- To enhance the safety and security of residents, staff, and visitors
- To deter and reduce the risk of crime, vandalism, and anti-social behaviour
- To protect company property and assets
- To assist in the investigation of incidents or complaints
- To support the health and safety objectives of the organisation

3. Scope of Coverage

CCTV is installed in communal and external areas of JL Homes properties, such as:

- Entrances and exits
- Hallways and corridors
- Shared lounges and communal kitchens
- External pathways and gardens
- Car parks and bin stores

CCTV is not installed in private bedrooms or bathrooms to protect personal privacy.

4. Legal Basis

The use of CCTV constitutes the processing of personal data and is therefore regulated under the Data Protection Act 2018 and UK GDPR. The lawful basis for processing is:

- Legitimate interests: Ensuring the safety and security of individuals and property
- Legal obligation: Assisting in the prevention and detection of crime

JL Homes Enterprises is registered with the Information Commissioner’s Office (ICO) as a data controller.

5. Data Protection Impact Assessment (DPIA)

A full DPIA has been undertaken before the installation of CCTV to ensure its necessity, proportionality, and minimal privacy intrusion. The assessment is reviewed annually or whenever the CCTV system is materially changed.

6. CCTV Signage and Notification

Clear signage is displayed at all entrances and other key areas under surveillance. The signage includes:

- Notification that CCTV is in operation
- The purpose for the monitoring
- Contact details for the data controller

Residents are informed of the CCTV system upon tenancy and again during key reviews.

7. Access and Data Storage

CCTV footage is stored securely and access is strictly limited to authorised staff (e.g., Registered Manager, DPO, Operations Director).

Recordings are stored for no more than 30 days, unless required for investigations or legal proceedings.

Footage may be shared with third parties (e.g., police) where legally required or justified.

8. Subject Access Requests (SARs)

Individuals have the right to request access to footage of themselves under the UK GDPR. Requests should be made in writing to the Data Protection Officer and will be responded to within one month, subject to identification checks and any applicable exemptions.

9. Covert Surveillance

JL Homes does not use covert surveillance unless authorised in exceptional circumstances, such as suspected criminal activity, and only with prior approval and legal guidance. Covert recording is time-limited and subject to a documented DPIA.

10. Training and Awareness

All staff with access to CCTV equipment receive training on data protection and privacy obligations. Refresher training is carried out annually.

11. Policy Review

This policy is reviewed annually, or earlier if there are significant changes to legislation, operational practices, or use of CCTV technology.

12. Contact Information

For queries regarding this policy or to submit a request related to CCTV footage, please contact:

Data Protection Lead
JL Homes Enterprises

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