

NORTHERN IRELAND FEDERATION OF HOUSING ASSOCIATIONS

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31 October 2007

FAO Ms Katherine Price
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Dear Ms Price

Re: CCTV Data Protection Code of Practice

The Northern Ireland Federation of Housing Associations (NIFHA) represents 43 housing associations which provide over 30,000 homes for people in need, as well as additional support services and facilities for people who require additional assistance. Some schemes include communal areas, particularly within those designed as sheltered and special needs dwellings.

The Federation was fortunate to be involved in a recent consultation event where our views were taken on board along with other Northern Ireland based organisations. Whilst we would broadly welcome this code of practice, NIFHA would like to make the following points which we feel should be taken into consideration:

1. The term "identifiable individuals" needs to be teased out so that it refers to the standard and quality of the retrieved images used in order to identify perpetrators of criminal activity
2. There may need to be further cross reference to various legislation, particularly in relation to the passing of information to third parties e.g. media
3. The code should suggest further research into identifying liability where cameras are not in operation, either through malfunction and/or timing sequence. This would be important in helping to clarify responsibility
4. Good practice should encourage an "all or nothing" approach, whereby the entire area is within view, yet without infringing on privacy. For example, criminals can very often detect "blind spots" and use this to their advantage.
5. Consideration should be given to enhancing recognition technology at ATMs so as to determine whether the user is actually the account holder

Representing and promoting housing associations in Northern Ireland

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6. Adequate staff training must be provided in order to recognise subject access requests
7. The code should give more detailed information on what is defined as “substantial and unwarranted damage or distress”.
8. It is important that further advice on licensing requirements is made available and clearly referred to within the context of the document.

The Federation would be grateful that our comments will be taken into consideration. NIFHA and its member housing associations would be keen to be involved and participate in any further discussions about this issue as deemed necessary.

Yours sincerely

A handwritten signature in black ink, reading "D. Henderson". The signature is written in a cursive style with a large, looped initial "D".

DONALL HENDERSON
HOUSING POLICY AND RESEARCH MANAGER