

Close Circuit Television (CCTV) Policy



Reference:	HS_POL_HOU_CCTV_1	Author:	Andrew Hitchcock
Scope:	Housing Solutions	Approved by:	Director of Resident Services & Community
Legislation:	Information Commissioner's CCTV Code of Practice Data Protection Act (1998) General Data Protection Regulations (GDPR) (2018)	Date of approval:	18 th July 2023
Regulatory/ Governance:	Tenancy Standard	Date of next review:	18 th July 2026
Related Policies:	Data Protection Policy Subject Access Request Policy Anti-Social Behaviour Policy		

1. Policy Statement

- 1.1 We acknowledge that CCTV systems may be needed to help prevent crime and anti-social behaviour.
- 1.2 We also acknowledge the growing demand for domestic CCTV systems including doorbell cameras to help residents protect their homes.
- 1.3 We need to balance our approach with the potential for complaints regarding privacy as a result of actual or perceived CCTV intrusion.
- 1.4 This policy applies to all customers living in homes owned or managed by Housing Solutions including general needs, intermediate rent, market rent, leasehold, shared ownership, supported and sheltered accommodation.
- 1.5 There may be some circumstances in which Housing Solutions is not the freeholder, or it is agency-managed and there may be specific rules regarding CCTV.
- 1.6 This policy aims to:
 - Clearly define our approach to managing CCTV and CCTV installation requests.
 - Clearly define the standards we expect of those who have installed CCTV.
 - Clarify when we will and will not allow CCTV to be installed.

- Provide a consistent, fair approach to CCTV installation requests.
 - Contribute to our corporate strategy of being safe, satisfied, and sustainable.
 - Comply with all relevant legislation.
- 1.7 This CCTV policy applies to all CCTV systems including those installed by Housing Solutions, and customers including doorbell cameras.
- 1.8 This CCTV policy applies to all CCTV recordings captured and those responsible for its operation.

2. Roles and Responsibilities

2.1 The roles and responsibilities relevant to this policy are:

Executive Team	Responsible for approving this policy and any amendments from time to time.
Director of Resident Services & Community	Responsible for recommending the strategic direction of the policy that feeds into the operational delivery for residents.
Head of Housing	Responsible for overseeing the operational delivery and service quality of housing services and compliance with this policy
Neighbourhood Team Manager	Responsible for overseeing operational delivery.
Community Services Manager	
Home Ownership Team Manager	
Housing, Supported / Sheltered Team leaders	Responsible for the day-to-day management of the teams delivering operational services to all prospective and current tenants.
Housing Officer	Responsible for tenancy management and informal resolutions
Anti-social Behaviour Officer	Responsible for anti-social behaviour case management and enforcement action.
All Staff	All staff are responsible for helping residents to sustain their tenancies wherever possible.

3. Our Approach

CCTV Owned & Managed by Housing Solutions

- 3.1 We may consider installing CCTV in exceptional circumstances for the purpose of crime/anti-social behaviour prevention in extreme circumstances and where all other methods of evidence gathering have been exhausted. This will be for a defined period.

- 3.2 We may consider installing a service-chargeable CCTV system upon reviewing a specific request and completing a detailed consultation with residents where there is a specific need for CCTV which other reasonable methods cannot meet.
- 3.3 We will only operate CCTV systems where there is clear signage. No camera will be hidden from view and all steps will be taken to prevent focusing on areas that would not respect the right to privacy (e.g. back gardens).
- 3.4 We may install CCTV in internal and external shared areas.
- 3.5 We will not install CCTV which records sound.

Third party CCTV

- 3.6 There may be some circumstances where CCTV is installed and Housing Solutions is not the freeholder, or our properties form part of a multi-landlord or tenure estate. Where this is the case, we will not have any jurisdiction over the CCTV system.

Police/Law Enforcement agencies (Prevention of Crime)

- 3.7 There may be circumstances where we allow covert monitoring by law enforcement agencies where we have received a formal request.
- 3.8 We do not constantly monitor our CCTV systems however will respond to requests from the police for CCTV images in accordance with the law.

Customer-owned CCTV (including doorbell cameras)

- 3.9 The use of recording equipment such as CCTV systems and doorbell cameras to capture video or sound recordings outside the users' property boundary is not a breach of data protection.
- 3.10 You do not need permission from Housing Solutions to install a doorbell camera if you live in a house with your own front door.
- 3.11 If you live in a property such as a flat with an internal communal area, we will not allow the installation of doorbell cameras or domestic CCTV systems. There may be exceptional circumstances where we would allow installation of doorbell cameras or domestic CCTV systems for a specified time where supported by the police / Law Enforcement agencies for the prevention of crime.
- 3.12 Customers who intend to install private CCTV systems must apply to Housing Solutions for permission using the [permissions form](#).
- 3.13 We will not unreasonably withhold consent for any request and will consider the following:
 - Why CCTV is needed.
 - Where it will be installed.
 - Who the CCTV will record.
 - Any other community impacts.

3.14 Should the private CCTV system/doorbell camera result in a neighbour dispute or allegation nuisance, annoyance, or harassment then we may withdraw permission and request that the CCTV system/doorbell camera is removed.

4. Appeals

4.1 If an individual request to install personal CCTV is refused, you can appeal in writing within ten working days of the original decision being communicated. The Head of Housing will investigate the reasons for the refusal and will advise the applicant in writing of their decision. This process will be concluded within ten working days. The decision of the Head of Housing will be final.

4.2 This appeal process does not interfere with the individual's right to make a complaint to the Housing Ombudsman.

5. Legislation

- Housing Solutions will ensure that we comply with the legislation and guidance set out on page 1 of this policy. We will also remain up to date with any changes in legislation, guidance, and best practice.

6. Consumer Standards

- By publishing and adhering to this policy, Housing Solutions is upholding the requirements set out in the Consumer Standards published by the Regulator of Social Housing.

7. Equality and Diversity

- Housing Solutions recognises the needs of a diverse population and always acts within the scope of its own Equality, Diversity & Inclusion Strategy and Policy, the Human Rights Act 1998, and Equalities Act 2010 to ensure that all tenants and prospective tenants are treated fairly and equally in making decisions under this policy. Housing Solutions works closely with its partners to ensure it clearly understands its resident community with clear regularly updated service user profiles. Housing Solutions will record, analyse, and monitor information on ethnicity, vulnerability, and disability to support the fair application of this policy.

8. Confidentiality

8.1 Under the Data Protection Act 2018 and UK General Data Protection Regulation (UKGDPR), all personal and sensitive information, however received, is treated as confidential. This includes:

- Anything of a personal nature that is not a matter of public record about a resident, client, applicant, staff, or board member.
- Sensitive organisational information.

8.2 Housing Solutions' employees will only involve other agencies and share information allowed either by statute or by an agreed Information Sharing Protocol relevant to this Policy.

9. Review

9.1 This policy will usually be reviewed on a three-yearly basis or more frequently in response to changes in legislation, regulatory guidance, good practice, or changes in other relevant Housing Solutions' policy.

9.2 We will monitor our performance in relation to the delivery of the services and activities set out in this policy on an ongoing basis through our established reporting mechanisms to our Executive Team, Board, and associated committees.