

RADIUS HOUSING ASSOCIATION 	Document No: HPO041	
	Prepared by:	C. Cackett
TITLE: CCTV & Video Doorbells Policy	Authorised By:	L. Wilson
	Date:	Aug 23
	Version No:	2
	Date Ratified by SMT:	Aug 23
	To be Reviewed: Aug 26	Page 1 of 5

1.0 Introduction

- 1.1 This policy sets out Radius expectations for tenants who are considering installing or have already installed a CCTV system or video doorbell to their home, setting out the legal requirements and regulations that domestic CCTV users should follow.
- 1.2 Video doorbell devices are governed by the regulations that relate to the wider category of CCTV use and for the purpose of this policy “CCTV” includes the use of video doorbells.
- 1.3 Installation of CCTV, which requires major physical alterations to a Radius property, is a matter that requires written permission in line with Radius’ General Conditions of Tenancy. As the landlord, Radius will have the final say in any decisions made for these matters.

2.0 Policy Scope

- 2.1 This policy is applicable to private CCTV system installation, installation requests, queries and complaints including the relevant legal requirement and regulations for properties managed by the Communities Department within Radius, including:
 - Legal requirements & regulations
 - Tenant responsibilities as a CCTV owner/user
 - Criteria for approval
 - Complaints
- 2.2 Operational procedures for staff will be based around this policy via the CCTV & Video Doorbell Procedure (HPRO048).

3.0 Legal Requirements & Regulations

- 3.1 The General Data Protection Regulation (GDPR) sets out in Chapter 1 (2b) that “This Regulation does not apply to the processing of personal data: by a natural person in the course of a purely personal or household activity”. This covers the use of domestic CCTV which is for the private use of the household.
- 3.2 The tenant has a duty to let people know that they are in an area where CCTV surveillance is being carried out and this should be facilitated through the use of signage. It is the tenant’s responsibility to ensure that all signage and associated costs are met and Radius will not assume any liability for such.

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3.3 The definition of a private domestic boundary is the boundary of the property (including private garden) where the household lives. This does not include the private property of others, communal or public spaces.

3.4 For CCTV systems that capture images or audio recordings of people outside the boundary of their private domestic property such as, a neighbouring property, communal spaces, public streets, footpaths etc. they must comply with the following legislation:

- Data Protection Act 2018
- [Human Rights \(ECHR\) Article 8](#)
“Everyone has the right to respect for his private and family life, his home and his correspondence.”
- [The Protection from Harassment \(NI Order\) 1997](#)

3.5 Non-compliance with Radius’ General Terms and Conditions of Tenancy, in relation to the installation of CCTV, may result in legal action being taken by the Association to remove the CCTV equipment, recovery of costs for any damage caused and/or as a breach of tenancy conditions.

4.0 Approval Criteria

4.1 Tenants who live in Radius properties with their own front door, that does not lead on to an internal communal area such as a corridor, must request permission in writing if their CCTV installation requires major physical alterations to the property e.g. a hard wired CCTV system that requires a competent tradesperson to install. The Housing Officer may wish to consult with the Assets Offer if there are concerns for physical alterations which may damage the property. Permission in writing is not required for wireless CCTV for this property type.

4.2 Radius **does not give permission for tenants who live in an apartment** to install CCTV or make any alterations to internal or external communal areas of their building. This includes, but is not limited to, securing cables of equipment to walls, drilling into front doors to install a video doorbell etc. If a tenant in an apartment block requests permission to install CCTV, the Housing Officer will provide information on the current security set up at the scheme, review existing security measures to ensure they remain adequate and arrange for any actions required to improve the security set-up.

4.3 Applications for installation of CCTV or video doorbells from an Occupational Therapist will be handled by the Adaptations Team.

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5.0 Tenant Responsibilities as a CCTV owner/user

5.1 Prior to installing CCTV, tenants must consider the following:

- how CCTV may invade the privacy of others
- the responsibilities associated with the use of CCTV and legislation around this.
- other home security options, such as outdoor lighting etc.

5.2 Tenants who wish to install CCTV or already have this in place, must ensure they do so in a way that respects other people's privacy and check the current guidance available by the Information Commissioners Office (ICO) in terms of Domestic CCTV Systems.

5.3 Request written permission for installation of CCTV that requires major physical alterations (See 4.1). Only if written permission has been granted can the tenant install CCTV equipment requiring physical alterations to the property by a competent person.

5.4 A tenant assumes responsibility for installing, maintaining, servicing and removing CCTV equipment. The tenant is responsible for any damage caused to Radius property during installation/removal of the CCTV and may be subject to a tenant recharge should Radius need to make right any damage to a Radius property.

5.5 CCTV recordings and images must be stored securely. Access to CCTV recordings and images, with the ability to view or download, should only be accessible by the tenant and household members. In line with Radius General Conditions of Tenancy, the tenant is responsible for the behaviour of their household or visitors and this extends to nuisance or complaints on the use of their domestic CCTV.

5.6 The ICO recommends that domestic CCTV should only be kept for as long as it is needed. Tenants are responsible to ensure that their footage is deleted securely.

6.0 Anti-Social Behaviour

6.1 While the CCTV should be for personal use, should a tenant unintentionally capture footage of an incident or ASB it is their responsibility to handle this footage appropriately as the data processor and within the guidelines set out by legislation and data protection.

6.2 Should any CCTV footage or images capture an incident or anti-social behaviour (ASB), tenants should:

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- Report the incident to the Police Service of Northern Ireland (PSNI)
- Release footage to the PSNI, only if they request this, in line with DPA to ensure the footage is safe, secure and not handed over to others.
- Contact their Housing Officer to inform us of the incident and Crime Reference Number. All reports of ASB will be handled by Radius in line with the Anti-social Behaviour Policy (HPO001).

6.3 Radius reserves the right to review or request removal of tenant CCTV should evidence be presented that indicated footage and images have been misused or been the subject of a complaint. This includes if the CCTV becomes the reason for a neighbour dispute and/or allegation of harassment.

7.0 CCTV Outside Approval Criteria

- 7.1 Should a member of staff become aware of CCTV that has been installed outside of the approval criteria indicated (4.0), they should inform the Housing Officer.
- 7.2 If the CCTV is installed in a communal area and/or potentially compromises the safety elements of the property (e.g. attached to a fire door) the Housing Officer will engage with the tenant at the earliest opportunity in conjunction with the Assets Department to ensure removal and remedy any damage caused if applicable.
- 7.3 Should Radius be required to remove CCTV the tenant may be asked to repay the cost of removal. The cost for removal will vary depending on the work involved.

8.0 Complaints

- 8.1 Complaints reporting nuisance due to the use of CCTV will be handled through Radius Anti-Social Behaviour (ASB) Policy & Procedure.
- 8.2 Complaints on the content or application of this policy will be handled in accordance with Radius Complaints Policy (HRPO0004).

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Associated Policies & Procedures:

- HPRO048 CCTV & Video Doorbells Procedure
- HPRO0072 CCTV and Data Protection Policy
- HRPO0068 Data Protection & Compliance Policy
- HRPO0073 Data Management & Retention Policy
- HPO001 Anti-Social Behaviour Policy
- HRPO0004 Complaints Policy
- Privacy Policy

This Policy has been screened and complies with Section 75 duties.