

RUNNYMEDE BOROUGH COUNCIL

Closed Circuit Television (CCTV) Policy Council Housing Estates

Review due:

1. Introduction

- 1.1 This policy sets out our approach to the use of CCTV on our housing estates. This policy applies to all Runnymede Borough Council (RBC) tenants and leaseholders.
- 1.2 Self-installed CCTV including video doorbells is a growing phenomenon, this policy outlines our approach to the use of CCTV including requiring permission to install.

2. Aim

- 2.1 The aim of this policy is to;
 - Provide confidence that data captured on CCTV is handled in accordance with data protection principles.
 - Ensure consistent approach to the use of CCTV and other recording equipment
 - Explain our approach to private use of CCTV by residents

3. Scope, definitions and legislation

- 3.1 This policy applies to Runnymede Borough Council (RBC) housing tenants and leaseholders and covers;
 - CCTV systems (general cameras and recording equipment)
 - Self-contained image recording devices (doorbells with integrated cameras)

This policy does not extend to Safer Runnymede CCTV that covers any of our Housing estates.

- 3.2 The legalisations that apply to this policy are;
 - Human Rights Act 1998
 - Regulation of Investigatory Powers Act 2000 (RIPA)
 - Protection of Freedoms Act 2012
 - Data Protection Act 2018
 - General Data Protection Regulation 2018

4. General Principles

4.1 Under the Protection of Freedoms Act 2012, we must have regard to the Surveillance Camera Code of Practice (“the Code”), which sets out principles for the use of CCTV by public authorities.

These principles include;

- Use of surveillance camera being for a specified purpose
- User of a surveillance camera must take into account its effect on individuals and their privacy.
- Clear rules, policies and procedures must be in place before a surveillance camera system is used and be communicated to all who need to comply with them.

5. Private CCTV and Recording Devices

5.1 All tenants are required to obtain permission from RBC before obtaining and installing private CCTV and/or other recording devices including video doorbells.

5.2 If a resident already has a private CCTV and/or other recording device, prior to the start date of this policy, permission to keep them will be considered on a case-by-case basis.

5.3 If permission has been granted for installation of CCTV this is limited to no more than three CCTV cameras two in the front (one CCTV and one video doorbell) and back of property.

5.4 Permission would not be given if the CCTV or video doorbell covers a communal area or public highway instead the Council would insist on the use of audio doorbell only.

5.5 Permission will be granted on the following conditions:

- All work is carried out at the tenant's own cost. The Council is not liable for loss, damage, injury, or any third-party claim connected with the works.
- Maintenance of the CCTV or video doorbell will be the tenant's responsibility for the duration of your tenancy. When a tenancy ends the tenant will be required to remove the CCTV or video doorbell and make good any damage, at your own cost
- The tenant must sign a consent form agreeing not to use the video function to cover the public highway.

5.6 If private CCTV or other recording devices are installed without permission, we reserve the right to take action to seek its removal. If device is placed on or affixed to our property, we reserve the right to remove it without notice, and we may charge the resident for the cost of doing so and for repairing any damage caused to our property.

5.7 In exceptional circumstances and following a recommendation from the police Runnymede Borough Council will consider requests to allow specified areas of a communal area or public highway to be videoed. Permission to install video equipment would normally only be granted to prevent/record actual threats or acts of violence.

6. Enforcement

6.1 RBC reserve the right to enforce this policy in line with tenancy agreement section 5.3 states, *"you must get written permission from us before you carry out any alterations or improvement to your home or shared areas."*

Any such requests should be sent in writing to the Housing and Neighbourhood Services Team.

6.2 The Council reserves the right to withdraw permission to have a CCTV at any time if any tenant does not adhere to this policy. The tenant will be asked to remove the CCTV (including video doorbell) immediately, and potentially, permanently.

7. Data Protection

7.1 The Data Protection Act 2018 and General Data Protection Regulation do not apply to domestic CCTV or video doorbell installations if they are only trained on a domestic property.

7.2 If a camera captures images of people outside the boundary of your private domestic property – for example, a neighbours' home or garden, shared spaces, or public footpath then the Data Protection Act 2018 and General Data Protection Regulation applies.

Runnymede Borough Council's Housing Service would not give a tenant permission to mount a camera which requires the tenant to comply with the Data Protection Act 2018 and General Protection Regulations 2018.

8. Complaints About CCTV

8.1 If, having checked the guidance, you believe a tenant is in breach of the above conditions of mounting a CCTV camera, or a CCTV camera and/or video doorbell covers shared spaces or public footpath you should submit your concerns and supporting evidence to Housing and Neighbourhood Services who will review your complaint and update you accordingly.

8.2 You can do this by writing to us at Runnymede Civic Offices, Station Road, Addlestone, Surrey, KT15 2AH or by emailing us at tenancy.management@runnymede.gov.uk

9. Consultation, communication and training

9.1 RBC will provide clear and comprehensive advice and information to residents, with an aim for a single point of contact.

9.2 Housing Management Team, Data Protection team and Safer Runnymede have also been consulted

10. Monitoring and performance management

10.1 We aim to review this policy every three years to ensure it reflects current legislation and latest examples of best practice.

10.2 The Area Housing Managers will record on Northgate and monitor where tenants have received permission or where the Council has refused permission

11. Equalities Implications

11.1 In producing this document an Equality Impact Assessment (EIA) has been carried out.

11.2 An EIA is a way of assessing the impact, or likely impact, that a particular policy, procedure or decision will have on particular groups. This is used to assess whether in making the decision whether the Council has complied with its public sector equality duty under S149 of the Equality Act 2010 (as amended) to; eliminate discrimination and any other conduct that is prohibited under this act and to advance equality between those who share a protected characteristic

11.3 The screening found that there is no evidence that tenants with any of the nine protected characteristics will be negatively impacted by this policy.

12. Related strategies/Documents

<https://www.gov.uk/government/publications/domestic-cctv-using-cctv-systems-on-your-property/domestic-cctv-using-cctv-systems-on-your-property>

<https://ico.org.uk/your-data-matters/domestic-cctv-systems-guidance-for-people-using-cctv/>

[CCTV Guidance for Residents.docx](#)

13. Version Control

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
V1	April 22	First draft completed			