

RUNNYMEDE BOROUGH COUNCIL

Closed Circuit Television (CCTV) Policy Council Housing Estates

Review due: June 2027

1. Introduction

1.1 This policy sets out how Runnymede Borough Council (RBC) deals with CCTV on its housing estates. This policy applies to all Council tenants.

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 a consistent approach to the use of CCTV and other recording equipment
- Explain our approach to private use of CCTV by tenants
- Outline the advice relating to the use of residential CCTV provided by the by the Information Commissioners Office and their guidance relating to a proportionate approach to complaints.
- Ensure that a disproportionate level of resources is not required to monitor the installation and use of CCTV and deal with complaints from other residents.

3. Scope, definitions and legislation

3.1 This policy applies to RBC housing tenants and covers;

- CCTV systems (general cameras and recording equipment)
- Self-contained image recording devices (doorbells with integrated cameras)

3.2 This policy does not extend to RBC Safer Runnymede CCTV that covers Housing estates.

3.3 The legalisation that applies to this policy includes:

- 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, the Council 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.

4.2 This policy is written in accordance with the guidance on domestic CCTV provided by the Information Commissioner's Office (ICO) [Domestic CCTV systems | ICO](#)

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 tenant 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 three CCTV cameras including a video doorbell. Video doorbells are only permitted attached to a front/back door and cannot be mounted on a gate, door, fence(s) or other structure at or near to the boundary to the property pointing to the highway or communal entrance.

5.4 Permission may not be given if the CCTV or video doorbell would cover/record a communal area or public highway instead the Council may require the use of an audio doorbell only. In cases where another agency such as the Police or Social Services advocate for CCTV as a protection measure permission may be given for a specific period to be reviewed.

5.5 CCTV should not be placed at a height where it will cover an area not within the tenancy boundary, such as overlooking a neighbouring garden or communal area. In cases where another agency such as the Police or Social Services advocate for CCTV as a protection measure permission may be given for a specific period to be reviewed.

5.6 If permission is given for CCTV which films communal areas and other residents/visitors entering/exiting a property e.g. on the front door of a flat within a block and a complaint is received then RBC reserves the right to withdraw permission.

5.7 If private CCTV or other recording devices are installed without permission, the Council reserves the right to take appropriate action to seek its removal. If a device is placed on or affixed to Council property, we reserve the right to request its immediate removal, and we may charge the tenant for the cost of doing so and for repairing any damage caused to Council property.

6. Rules and Conditions

6.1 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 their tenancy. When a tenancy ends the tenant will be required to remove the CCTV or video doorbell and make good any damage, at their own cost
- The tenant must sign a consent form agreeing to follow the CCTV rules.

6.2 In order not to impact on other residents, people should point their CCTV cameras away from their neighbours' homes and gardens, shared spaces, or public streets.

6.3 The CCTV should have the setting applied to record only within the private space of the tenancy.

7. Neighbour Disputes

7.1 If CCTV causes a neighbourhood dispute, we will review the permission that has been granted

7.2 If there is already an existing neighbourhood dispute which is then escalated by the introduction of CCTV then RBC reserve the right to withdraw permission.

7.3 Where there are concerns for residents' safety CCTV may be allowed for a period at the discretion of RBC.

8. Enforcement

8.1 RBC reserve the right to enforce this policy in line with tenancy agreement section 5.3 which 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 Council.

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

9. Data Protection

9.1 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.**

9.2 Runnymede Borough Council's Housing Service would not give a tenant permission to mount a camera which does not comply with the Data Protection Act 2018 and General Protection Regulations 2018 this includes recording public highways, shared communal spaces or public footpaths.

9.3 Data protection law says that people who capture images or audio recordings from **outside their property boundary** using a fixed camera, such as a CCTV camera or smart doorbell, should:

- tell people that they are using recording equipment;
- in most circumstances, provide some of the recording if asked by a person whose images have been captured;
- regularly or automatically delete footage;
- in most circumstances, delete recordings of people if they ask; and

- stop recording a person if they object to being recorded, but only if it is possible to do so. For example, if they can point the camera in a different direction but still use it for the same purposes, e.g. keeping their property safe

9.4 **The Council requires tenants to set all CCTV and camera doorbells to only capture the area up to the boundary of their property** so that there is no opportunity to breach the Data Protection Act 2018.

10. Complaints About CCTV

10.1 If a resident has tried talking to someone who is using CCTV but has on-going concerns about any breach of this policy, they should contact the Council with any supporting evidence for the Council to review.

11. Consultation, communication and training

11.1 Housing Management Team, Law and Governance, Data Protection team and Safer Runnymede have been consulted on this policy.

12. Monitoring and performance management

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

12.2 Housing staff will monitor where tenants have received permission and where the Council has refused permission

13. Equalities Implications

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

13.2 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.

13.3 The screening found that there is no evidence that people with protected characteristics will be negatively impacted by this policy.

14. 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](#)

15. Version Control

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
V1	April 22	First draft completed	June 2023	Luisa Cantore-Norris	Housing Committee
V2	January 24	Updates made to first draft	June 2024	Angela Horsey	Housing Committee