



**Provanhall Housing Association Limited**

**POLICY**

**CCTV and Surveillance Systems Policy**

**AUTHOR**

**Alan Hume, Chief Executive**

<b>DRAFTED</b>	<b>APPROVED</b>	<b>NEXT REVIEW</b>
<b>February 2026</b>	<b>March 2026</b>	<b>March 2029</b>

## Contents

1.	Introduction.....	3
2.	Use of CCTV by tenants of PHA.....	3
3.	Decisions on installing CCTV and Surveillance Systems.....	4
4.	System Specification and Installation .....	4
5.	Access and Use of Images .....	5
6.	Reviewing Installations .....	6
7.	Privacy Information .....	6
8.	Review.....	6

## **1. Introduction**

- 1.1 Provanhall Housing Association (PHA) operates CCTV and other surveillance systems at offices, residential properties and community facilities for purposes of security and safety where there is a risk of crime or a threat to health, safety or wellbeing, and to assist in the prevention and detection of crime or anti-social behaviour.
- 1.2 PHA acknowledges its obligations and the rights and freedoms of individuals whose images may be captured. We are committed to operating fairly and lawfully at all times and will comply with the UK GDPR and the Data Protection Act 2018 (DPA 2018).
- 1.3 This policy governs PHA's approach to installing and operating CCTV and related surveillance systems and the handling of information obtained. It is underpinned by the following principles:
  - a documented, justified need evidenced by risk assessment
  - consideration of alternative and less intrusive options
  - completion of a Data Protection Impact Assessment (DPIA) for new or high-risk deployments
  - professional installation and maintenance following PHA specification, privacy by design and ICO guidance
  - appropriate technical and organisational measures including encryption, access control (least privilege), multi-factor authentication where available, and access logging
  - transparent & published privacy policy
  - clear signage

## **2. Use of CCTV by tenants of PHA**

- 2.1 PHA recognises the increasing use of domestic CCTV and video doorbells by tenants and residents.
- 2.2 Tenants are not allowed to install surveillance cameras. Tenants will be required to remove any surveillance cameras devices at their own cost following 14 days' written notice from PHA. Failure to do so may result in PHA removing them and the associated costs being recharged to the tenant(s).
- 2.3 Tenants must obtain written permission from PHA before installing any video doorbells devices. An assessment will be carried out by PHA to ascertain whether a video doorbell (or similar type device) is appropriate. The tenant will be notified in writing of the decision within 14 days of the request being received.
- 2.4 If permission is granted for a video doorbell, it will require tenants to put up stickers notifying other residents or members of the public about the device. Should PHA receive any complaints about the use of the video doorbell, then

permission will be withdrawn and the tenant will be required to remove the device at their own cost following 14 days' written notice. Failure to do so may result in PHA removing them and the associated costs being recharged to the tenant(s).

- 2.5 Main door properties with permission to have a video doorbell will also require to have stickers up to notify visitors of the device and must only capture images within the curtilage (boundary) of the property.
- 2.6 In all cases, residents must display clear signage stating who is collecting the data, the purpose(s) and contact details for further information. PHA accepts no responsibility for such installations or any liability arising from the audio or images they capture. Tenants are responsible for compliance with data protection law where their systems capture images beyond purely personal/household use.

### **3. Decisions on installing CCTV and Surveillance Systems**

- 3.1 PHA recognises that surveillance can be privacy intrusive and will not install systems as a routine response. Each proposal will be assessed case-by-case to evidence that installation is necessary, proportionate and effective to address a defined risk, supported by a DPIA and an identified lawful basis for processing.

### **4. System Specification and Installation**

- 4.1 PHA will procure and site systems in line with a standard specification reflecting recommended practice and privacy by design/default. Relevant criteria include:
  - ability to locate, search and extract footage relating to a data subject efficiently
  - image quality appropriate to the stated purpose (including night-time performance where relevant)
  - accurate, synchronised date/time stamping on all recordings
  - privacy masking and camera positioning to minimise capture of unnecessary areas
  - image-only recording by default for external cameras.
  - audio and image recording has been approved by the Chief Executive within the office entrance, reception and an interview room for staff safety
  - camera siting limited to areas of legitimate interest, considering planning requirements where applicable
  - camera siting to ensure quality images considering lighting, weather and environmental factors
  - secure siting of cameras and recording equipment to prevent unauthorised access, tampering or vandalism.

4.2 Where contractors act as data processors, appropriate contractual terms will be in place.

## **5. Access and Use of Images**

- 5.1 PHA considers the following to be permitted reasons for monitoring:
- prevention and detection of anti-social and criminal behaviour or other breaches of tenancy/occupancy agreements by residents or visitors
  - prevention and detection of unacceptable behaviour towards staff within office premises
  - prevention and detection of unauthorised access to office premises or other criminal activity; and/or
  - compliance with legal obligations, regulatory requirements and PHA policies and procedures.
- 5.2 Images captured in office entrance, reception area and interview room may be viewed in real time by limited staff during working hours for health and safety purposes. Where access to recordings is required to investigate an incident, a request must be authorised (as a minimum) by the Chief Executive.
- 5.3 PHA will not undertake routine monitoring of images captured in residential locations. Access to images will occur on an as-required basis for the purposes for which the system was installed (e.g. investigation of a reported or suspected incident), including short-term targeted monitoring to evidence ongoing or repeated incidents.
- 5.4 Individuals may request access to images via a Subject Access Request (SAR). All such requests will be handled in line with PHA's SAR procedures, balancing the requester's rights with the rights of third parties who appear in the footage (including redaction where appropriate). On receipt of a SAR, relevant images will be preserved to prevent automatic deletion.
- 5.5 Disclosure of images will be controlled and consistent with the purpose(s) for which the system was installed and the applicable lawful basis. Disclosures are likely to be limited to law enforcement agencies or PHA's legal advisers.
- 5.6 PHA will not routinely create or retain copies of images. Any images returned following disclosure will be retained only as necessary and then disposed of securely in line with PHA's Data Retention and Destruction Policy.
- 5.7 Any attempted or actual misuse of CCTV systems or images by staff is a disciplinary matter and will be addressed under the relevant policies and procedures.
- 5.8 Retention: unless otherwise justified, videos will be retained for 30 days. Where footage relates to an investigation, complaint or legal claim, it may be retained for as long as necessary to fulfil that purpose.

## **6. Reviewing Installations**

- 6.1 Where a system is no longer required, PHA will promptly decommission it, including removal of cameras/equipment and signage and secure deletion of any remaining images, in accordance with PHA procedures.

## **7. Privacy Information**

- 7.1 PHA will be transparent about its use of CCTV. Privacy notices will reference the collection of personal data via systems. The Officer requesting installation will issue communications signposting the relevant privacy notice to affected individuals. Clear, prominent signage will be in place where systems operate and will state controller and contact details. Complaints about implementation or compliance will be handled under PHA's Complaints Handling Procedure.
- 7.2 Individuals may also complain to the Information Commissioner's Office (ICO) if they believe PHA is not operating CCTV in accordance with the UK GDPR and/or the DPA 2018.

## **8. Review**

- 8.1 This policy will be reviewed every three years, or sooner if required by changes in legislation, regulatory guidance, or technology.