

Grainger Trust Limited ('GT') CCTV Policy Tenant Use of CCTV

April 2025

1. Introduction & Statement of Intent

This Policy sets out and outlines how Grainger Trust Limited, recognises that some of our residents will feel more secure if they install external Close Circuit Television (CCTV) or camera doorbells to deter crime or if they have been experiencing problems of persistent anti-social behaviour or other crime. Some of our customers may have been advised to install these items for the purposes by other agencies including for the purposes of providing evidence of crime.

GT also recognises that some neighbours may find the installation of a CCTV camera or camera doorbell that covers (or seems to cover) their property to be an intrusion on their privacy.

Our customers may choose to use their own CCTV systems, and permission must be sought in writing to GT and we will offer advice on how to do so appropriately.

It is not the current policy of GT to install CCTV equipment within the communal areas of its neighbourhoods as a matter of course.

GT reserves the right to consider the installation of CCTV equipment should it be deemed necessary to maintain the safety of its neighbourhoods.

GT will consult with customers where the CCTV installation is considered as a necessary security measure and will ensure that its use will be compliant with data protection legislation and will be outlined within GT policy and procedure.

2. Aims and Objectives

This policy applies to GT customers who may wish to install an external CCTV system or camera doorbell.

The aims and objectives of the policy are to:

- Help create safe, secure and sustainable neighbourhoods and communities
- Improve tenancy sustainment
- Recognise that some tenants may feel more secure if they install external CCTV or camera doorbell
- Recognise that some tenants may find the installation of a CCTV camera or camera doorbell to be an invasion of their privacy
- Find a balance between the two situations above to allow our customers to feel more safe and secure by installing CCTV camera or camera doorbell or provide evidence of crime or anti-social behaviour, but also protecting the privacy of their neighbours and members of the public
- Provide guidance to staff, members and tenants on the criteria and rules for allowing the installation of CCTV or camera doorbell by our tenants on our properties

GT has a legal obligation to meet the standards set by the Regulator of Social Housing to:

- Keep neighbourhood and communal areas associated with the homes it owns safe; and
- Prevent and tackle anti-social behaviour in the neighbourhoods where it owns homes.

3. Permission to Install CCTV or Camera Doorbells, Records and Review

Customer must apply to GT for permission, before installation of CCTV or camera doorbells. Supporting information can be provided by other agencies (e.g. Police) but it must be the tenant that makes the request (or anyone legally entitled to act on their behalf).

Any requests from tenants to install their own CCTV or camera doorbells will be reviewed and determined on a case-by-case basis.

GT may ask that tenants to consider other possible options such as security lighting or neighbourhood watch schemes before requesting permission to install CCTV or camera doorbells.

Where CCTV or a camera doorbell has been installed without permission, the tenant will be required to remove the installation. In some cases, it may be possible to apply for retrospective permission which will be considered against all aspects of this policy. This is at the discretion of GT and all cameras must be disabled until the outcome of the request.

Numerous factors will be considered when CCTV or camera doorbell installation has been requested. These include but are not limited to:

- Why the CCTV or camera doorbell is needed
- Whether any other means could be used to protect the property or occupants
- The area covered by the CCTV or camera doorbell
- Whether the CCTV or camera doorbell is recording sound or not
- Whether the CCTV or camera doorbell coverage could be intrusive on neighbours' or others' privacy
- How neighbours feel (or might feel) about the CCTV or camera doorbell being installed
- Whether another agency has recommended the installation of CCTV or camera doorbell to the tenant
- Any other factors that GT deems reasonable to consider

Permission to install CCTV or cameras will not ordinarily be given for reasons of convenience, for example in relation to online deliveries.

4. The Law and Customers Responsibilities

Once permission is granted tenants must:

- Comply with the law. When a tenant contacts us, GT will direct them to information about the law that they must follow at: [Guidance on the use of domestic CCTV - GOV.UK](https://www.gov.uk/guidance/cctv-in-private-domestic-properties)
- Any tenants who wish to install and use ring doorbells act as data controllers and are responsible for ensuring they do so in compliance with data protection legislation
- Cover their property and not the neighbour's property or any communal areas. This means that tenants may not be granted permission for the CCTV or a camera doorbell if they live in a flat with a shared entrance.
- Have a camera doorbell which does not record or save footage if it covers a neighbour's property or any communal areas. This means if a tenant lives in a flat with a shared entrance, permission may only be given for a camera doorbell with a live video stream.
- Make good any damage caused from the installing or removing of any CCTV or camera doorbells.
- Not compromise electrical or fire safety (e.g., overload or damage electrical systems, damage fire doors including flat entrance doors).

Failure to meet these requirements may result in GT requiring the tenant to remove the CCTV equipment or camera doorbell.

GT does not regard CCTV or camera doorbell installation as an improvement and will not make payments under the compensation for improvements scheme.

In some instances, it may not be possible to site a CCTV or a camera doorbell without capturing images of parts of a neighbouring property or communal areas. If images are being captured outside of the boundaries of a tenant's property, it may be covered under subject to data protection laws (i.e. the Data Protection Act 2018 and/or the UK General Data Protection Regulation and the tenant will need to comply with all requirements under this legislation.

5.Customer use of CCTV

If you operate a domestic CCTV system or smart camera doorbell, you must:

- Ensure the camera is installed next to the door of your property, but not on the door frame itself, and it must be within the legal boundary of the property
- Take responsibility to ensure installation of the camera does not cause structural damage to the property or compromise the fire-safety integrity of the building
- Wherever possible, ensure the camera only captures images and information of individuals visiting your property within the area of the front door
- Wherever possible, point cameras away from neighbours' properties, especially their doors and windows, gardens, communal areas, shared hallways, or public areas. Where this is not possible, carefully consider how intrusive the camera is for other residents

- Set a privacy blur filter on the recording device as per the set-up instructions (if available) to limit the accidental capture of individuals where possible
- Remove any CCTV equipment or doorbell camera if you are vacating the property and ensure the device is deactivated and you no longer have access to the video footage
- Comply, wherever necessary and legally permissible, with a request for video footage on your device from a member of the public, a neighbour, or external agency. GT are unable to make the access request on behalf of that person or agency or force the camera owner to provide any video footage.

GT will require tenants to request permission to install CCTV at their home, including smart doorbells. Footage should only be used for household purposes, including:

- Security and safety purposes, including as a deterrent
- Being able to see visitors at the door
- Providing evidence to the police, for criminal investigations
- Customers should not use screen shot/recording images on open source websites such as Facebook or Facebook groups
- Cameras should not be concealed and should not be used to records conversations
- Customers must only use CCTV footages for purely personal or household purposes
- Customers are the data controllers of all footage and are responsible for compliance with data protection legislation and any associated legislation.

6. Review

This policy will be reviewed every three years or when there is a change in circumstances, in work practices or the introduction of new regulation or legislation.

Document Owner and Approval

The Head of Grainger Trust is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of Grainger Trust.

A current version of this document is available to all members of staff on the corporate intranet.

Document History

Policy Owner	Head of Grainger Trust
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