



"Offering our community more than a home"

Home CCTV Policy

Management Committee submission: April 2026

Date Approved:

Last Approved:

Next Review date: April 2029

CHA Objectives:

- To manage the houses provided, in a professional and cost-effective manner, for the benefit of our local community and the environment.
- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

Regulatory Standards:

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
- The RSL conducts its affairs with honesty and integrity.
- The governing body and senior officers have the skills and knowledge they need to be effective.

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Clydebank Housing Association Limited

Home CCTV Policy

INDEX

SECTION A

- A1 INTRODUCTION**
- A2 POLICIES AND GUIDANCE**
- A3 PURPOSE**
- A4 IMPLEMENTATION OF POLICY**

SECTION B

- B1 TENANTS RIGHTS TO MAKE IMPOROVEMENTS**

SECTION C

- C1 TENANTS RESPONSIBILITES**
- C2 HOME CCTV AND AUDIO RECORDINGS**
- C3 LAWS AND GUIDANCE**
- C4 ADVICE AND COMPLAINTS**

A1. INTRODUCTION

Clydebank Housing Association (CHA) is committed to the safety of its tenants and Home CCTV, including Video doorbells add an extra layer of security to a home. Home CCTV provides a safeguard from intrusion, vandalism, damage, disruption and anti-social behaviour. We want our tenants to feel safe inside their homes, and we won't prevent the installation of Home CCTV. However, Tenants must comply with our Tenancy agreement and seek permission before any installation.

CCTV is a surveillance system that comprises cameras, recorders and viewing screens. Modern CCTV systems use digital video recorders (DVRs) and digital 'network cameras. These cameras have higher resolution than previous models, and provide greater flexibility of installation, usage, and in storage of images taken. Where CCTV is in use, images will be treated as data in the same manner as paper or computer-based information.

A2. POLICIES AND GUIDANCE

CHA aims to comply with all relevant policies and guidance in particular:

- Clydebank HA IT Policy
- Clydebank HA Data Protection Policy
- Clydebank HA CCTV Policy
- Clydebank HA Tenancy Agreement
- The Surveillance Camera Code of Practice (PoFA 2012)
- Information Commissioner's Office – Home CCTV Systems

A3. PURPOSE

This Policy has been produced to regulate the management, operation, use and restrictions of Home CCTV systems including video doorbells. The policy,

- Establishes basic guidelines for appropriate use.
- Sets out the purposes for which it will be used.
- Details the responsibilities and obligations of both the Association and the tenant has when using, accessing, storing and sharing data taken from the Home CCTV system.
- Will be used in conjunction with the police for the prevention and detection of crime.

A4. IMPLEMENTATION OF POLICY

- The Chief Executive will ensure the implementation and review of this policy.
- The ICT and Compliance Officer (ICTCO) is responsible for ensuring the policy is up-to-date and relevant.
- All but in particular housing and maintenance staff are responsible for ensuring the implementation of the policy.

This policy applies to all CHA tenants; however, it is the responsibility of all CHA Staff to ensure tenants abide by the principles outlined above and also alert their line manager should any behaviours be witnessed which breach this, Policy.

All breaches of this Policy should be dealt with immediately. Behaviours and actions found to be breaching this Policy will be regarded as misconduct and will be dealt with appropriately and in accordance with the relevant policies, including their tenancy agreement.

B1. TENANTS RIGHTS TO MAKE IMPOROVEMENTS

Section 5.21 of CHA's tenancy agreement states a tenant must seek permission to add new fittings or fixtures (including CCTV or video doorbell installation). Where this Agreement requires the tenant to obtain our permission request in writing must be submitted.

A request will not be refused unreasonably but a refusal of permission will be made in writing as soon as possible. Permission may be granted on certain conditions, or permission may be withdrawn if the Home CCTV is considered antisocial to anyone in the neighbourhood.

In the reply to the tenant, they will be told either CHA agrees to the proposed alterations etc. and if so, whether any conditions attached. If a reply is not received within one month, CHA is taken to have agreed to your request. If CHA refuse permission, the reasons will mad in writing including any reasons for refusal within one month of receipt of your written application

An appeal can be made using CHA's complaints procedure and if the tenant is unhappy about the refusal or the conditions that were attached, they have the right to make application to the sheriff.

A tenant could be asked to pay a reasonable cost of putting the property back to its original condition if any alteration, improvement, or addition:

- was made without our written permission
- does not meet our reasonable requirements if we have given permission
- is in place at the time in which your tenancy is terminated for any reason.

C1. TENANTS RESPONSIBILITIES

Where possible a discussion should take place with the tenant in the different options to improve their home security and should be asked to consider the following:

- Is Home CCTV or a video doorbell the best security option?
- Would better lighting be a better security option?
- What is the most privacy-friendly way to setup the system?
- What areas will the cameras capture?
- Are cameras positioned to avoid intruding on my neighbours' property or any shared or public space?
- Are images to be recorded or is a live feed enough?
- In the first instance Anti- Social Behaviour should be reported to a CHA Housing Officer, or Police Scotland.

C2. HOME CCTV AND AUDIO RECORDINGS

Any Home CCTV system that allows audio-recording has strict guidelines and would normally be refused by CHA. A Home CCTV system that captures audio must have a lawful basis and must be made clear the CCTV captures audio.

C3. LAWS AND GUIDANCE

The ICO's guidance states Home CCTV cameras should be pointed away from someone else's property, a public area or communal space, where possible. You should also consider how intrusive the recording is, and where possible, apply filters or privacy blockers to blur or block out part of the footage.

The tenant is responsible for complying with data protection laws when capturing video images and or audio. If CCTV records beyond your property boundary, data protection law applies and the following rules must be followed:

- Have a clear reason for using the CCTV.
- Ensure the CCTV does not capture more than needs to.
- Install signage that indicates CCTV is in operation.
- Ensure the footage recorded is stored securely and is only accessible by people who need to access it.
- Delete the footage regularly or automatically, or both; and
- Respond appropriately to a request for the footage from people who appear in it.

C4. ADVICE AND COMPLAINTS

If a complaint is raised the following guidance applies:

- Contact Clydebank Housing Association, CHA will provide general advice however complaints of this matter is between the tenant and the complainers, and CHA will not view or keep video recordings sent by a tenant.
- A formal complaint to the ICO can be made by using the form below.
<https://ico.org.uk/make-a-complaint/home-cctv-complaints/home-cctv-complaints/>
- Reporting to the Police should only occur if there is an allegation of criminal activity.
- A tenant should always seek independent legal advice about their rights.
- Further information is available at the information Commissioner's Office website:
<https://ico.org.uk/for-the-public/home-cctv-systems/>
- The Information Commissioners Office can be contacted via telephone or live chat by selecting the link below: <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

Equality and Human Rights

We will not discriminate on the grounds of Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, and Sexual Orientation. An Equality Impact Assessment has been carried out and none of these protected groups will be unduly affected by this Policy. The Policy applies to all.

The Association will provide equality of opportunity and fair treatment for all, ensuring that no individual or group is treated less favourably than anyone else. We work closely with community stakeholders, to provide assurance that we are achieving these aims.

The Association will meet, and where appropriate exceed our obligations under the Equality Act 2010, including the general equality duty in the Act, to ensure we do not discriminate against, harass or victimise a person because they have one or more of the nine protected characteristics described in the Act.

An Equality Impact Assessment has been carried out as part of the review of this policy, in order to assess where the aims of this policy may have a positive, negative or neutral impact upon any of the nine Protected Characteristics set out in the Equality Act 2010.

Review

CHA undertakes to review this policy regularly, at least every three years after the initial first year review, with regard to:

- Applicable legislation, rules, regulations and guidance
- Changes in the organisation
- Continued best practice

For Office Use Only – Actions

Customer Consultation Required/Arranged	No
Intranet Update	Yes
F Drive Update	Yes
Website Update	Yes
Leaflet change required?	Yes
Newsletter Promotion?	Yes
Other information updated, e.g. posters, automatic email responses, post cards, answering machine messages, etc.	No
Equality Impact Assessment completed	Yes