

CCTV, Doorbells and Recording Equipment Policy

Summary

This policy explains Portsmouth Homes' approach to CCTV, smart doorbells, video doorbells and other recording equipment installed by residents.

Residents may use recording equipment to help protect their home, family or belongings. Any equipment must be installed and used safely, responsibly and with respect for the privacy of others.

Residents are responsible for their recording equipment, the recordings it captures and how it is installed, used and maintained.

Effective date

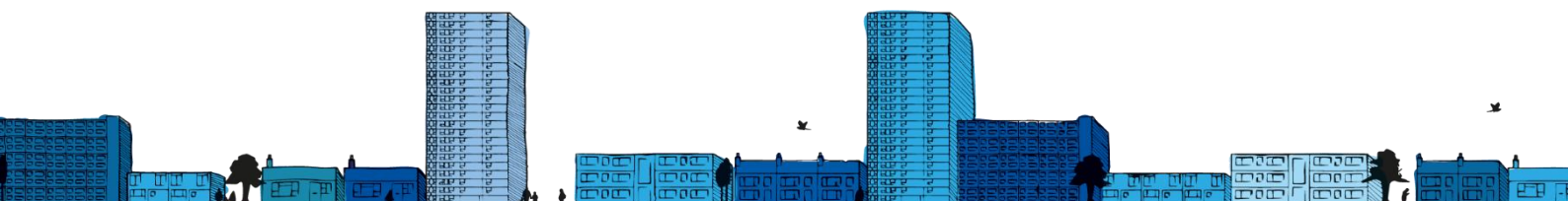
Example text

Review

We will review this Policy every 3 years or when there has been an update to legislative, regulatory, best practice or operational changes.

Version

Version 1.0



Home CCTV and Recording Equipment Policy

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Who This Policy Applies To

This policy applies to Portsmouth Homes tenants, leaseholders and shared owners who install, own or use CCTV, smart doorbells, video doorbells or other recording equipment at their home.

It does not apply to CCTV systems owned or operated by Portsmouth Homes, Portsmouth City Council or organisations working on our behalf. These systems are managed under separate policies, procedures and privacy notices.

If you provide footage to us, Portsmouth Homes becomes responsible for the copy we receive and will handle it in line with data protection legislation and our privacy arrangements.

Any reference in this policy to 'recording equipment' includes CCTV, smart doorbells, video doorbells and other devices that capture images, video or audio in or around the home.

Any reference in this policy to 'we', 'our' or 'us' refers to Portsmouth Homes.

Any reference in this policy to 'tenant', 'customer' or 'resident' refers to a Portsmouth Homes tenant, leaseholder or shared owner.

Why we have this policy

This policy explains what you need to know before installing or using CCTV, smart doorbells, video doorbells or other recording equipment in or around your home.

It explains:

- When you need permission to install recording equipment
- How recording equipment should be installed and used safely and responsibly
- Your responsibilities when using recording equipment
- How we will manage concerns and complaints
- How footage may be shared with Portsmouth Homes

We aim to balance your needs to feel safe and secure in their homes while respecting the privacy, safety and wellbeing of neighbours, visitors, staff and contractors.

Our Responsibilities

We will:

- Provide clear information and guidance about CCTV, smart doorbells, video doorbells and other recording equipment
- Consider requests, concerns and reports fairly and consistently
- Take account of privacy, safety, tenancy and lease requirements when making decisions



- Consider any footage shared with us where it is relevant to a report, investigation or complaint
- Handle any footage we receive in line with legal and regulatory requirements

We will only collect, use, retain or share footage where it is necessary and relevant to the matter being considered.

Your Responsibilities

If you choose to use CCTV, a smart doorbell, video doorbell or other recording equipment, you are responsible for the device, the recordings it captures and how it is installed and used.

You must use recording equipment responsibly, respect the privacy of others and comply with any legal requirements that apply.

You must:

- Use the device for personal safety and security purposes only
- Make sure the device is installed safely and does not damage Portsmouth Homes property
- Position the device so that it records the smallest area necessary
- Avoid recording neighbours, visitors, staff, contractors or communal areas unless this cannot reasonably be avoided
- Avoid recording neighbouring doors, windows, gardens, balconies or entrances wherever possible
- Switch off audio recording unless you have a clear, necessary and justifiable reason for using it.
- Keep recordings secure and restrict access to them
- Delete recordings when they are no longer needed
- Not publish recordings on social media or share them inappropriately, particularly where they identify other people without a lawful or legitimate reason
- Comply with any conditions attached to any permission granted by Portsmouth Homes
- Work with us to resolve any concerns raised about the device or its use.

Good Practice

Before installing or using recording equipment, you should consider whether:

- Another security measure, such as improved lighting, locks or an alarm, could meet your needs
- Recording is necessary or whether live viewing would be sufficient
- The device needs to operate continuously



- Audio recording is necessary and proportionate
- The device remains necessary and is only recording what is reasonably required

Before You Install

Before installing CCTV, a smart doorbell, video doorbell or other recording equipment, make sure it can be installed safely and without causing damage to your home or the building.

Before installing a device:

- Check whether it will be attached to Portsmouth Homes property.
- Position the device so it records the smallest area reasonably necessary.
- Avoid recording neighbouring homes and communal areas wherever possible.
- Read the permission requirements below before installing any device.
- Contact us before installation if you are unsure whether permission is required.

You must not install recording equipment in a way that:

- Damages Portsmouth Homes property
- Interferes with fire safety, building safety, access-control or security systems
- Affects access for residents, staff, contractors, inspections, repairs or emergency services

You must not attach equipment to any Portsmouth Homes door, door frame, wall or other part of the building where installation would involve drilling, wiring, permanent adhesive or another physical alteration without our written permission.

These requirements help protect the condition of our homes and buildings and ensure that fire safety, building safety, security and access arrangements continue to operate safely and effectively.

If recording equipment is installed in a way that damages the property or affects fire safety, building safety, security or access, we may require it to be adjusted or removed. We may also require any damage to be repaired and, where appropriate, recharge the reasonable cost of those repairs.

When permission is required

In some circumstances, you will need permission from Portsmouth Homes before installing CCTV, a smart doorbell, video doorbell or other recording equipment.

You must not

- Drill into, screw into, glue onto or alter a fire door or fire-door frame
- Attach equipment to communal areas, entrance doors or shared security doors
- Interfere with fire safety, building safety, access-control or security equipment



Removable adhesive fittings are not permitted on fire doors, fire-door frames, communal entrance doors or shared security doors.

You need written permission if

- The device will be attached to Portsmouth Homes property
- Installation involves drilling, wiring, cabling, screws or permanent adhesive
- The device will be fixed externally
- It will record a shared or communal part of the building
- It may affect safety, security, access or maintenance;
- The tenancy or lease requires permission

You do not normally need permission if

- The device uses a removable, no-drill fitting and is not attached to a fire door, fire-door frame, communal entrance door or shared area.
- It is not attached to a fire door, door frame, communal door or shared area
- It causes no damage
- It does not affect fire safety, security, access or communal systems
- It is used in accordance with the policy

To request permission, contact us. Please provide:

- Your name, address and contact details
- The type of device
- The proposed location
- How it will be fixed
- Photographs or a simple plan showing the proposed position
- The area it is expected to record
- The reason for the request, including any disability, safeguarding or personal safety needs

We will acknowledge requests and let you know if we need any further information. We aim to provide a written decision within 20 working days of receiving all the information required.

If permission is granted, we may apply reasonable conditions, for example relating to the location of the device, the method of installation, maintenance requirements, recording of communal areas or the use of privacy settings.

If permission is refused, we will explain the reasons for our decision and how you can ask for the decision to be reconsidered or make a complaint.



Our permission relates only to the installation of equipment on, or alterations to, Portsmouth Homes property. It does not confirm that the way the device records, stores, uses or shares information complies with data protection law or any other legal requirement.

You remain responsible for the device, any recordings it captures and how it is installed and used.

Recording Communal Areas and Shared Spaces

You should avoid recording communal areas, shared spaces and neighbouring homes wherever reasonably possible. This includes shared entrances, corridors, stairwells, lifts, lobbies, gardens, parking areas and neighbouring property entrances.

Where recording these areas cannot reasonably be avoided, you should consider whether the device can be repositioned or whether privacy settings, masking or filtering features can be used to reduce the area being recorded.

If your device is likely to record a communal area, shared space or neighbouring home, you should contact us before installation so we can advise whether permission is required and whether the proposed location is suitable.

Permission to install a device does not give permission to record people unlawfully. You remain responsible for how your device records, stores, uses and shares information and for complying with any legal requirements that apply.

We operate CCTV in some communal areas and buildings. These systems are not routinely monitored or continuously watched live. Recordings are only accessed, reviewed, retained and shared where there is a lawful and legitimate reason to do so, in line with data protection legislation, Information Commissioner's Office (ICO) guidance and our policies and procedures.

We do not provide CCTV footage directly to residents unless required by law, and any requests for access to footage will be managed in accordance with relevant legal and regulatory requirements.

Recording Staff and Contractors

Portsmouth Homes employees and contractors may enter homes, communal areas and shared spaces as part of their duties.

You may record interactions where it is lawful to do so. However, recordings must not be used to intimidate, harass, threaten or target staff, contractors, residents or other individuals.

Residents must not publish, distribute or share footage of Portsmouth Homes employees, contractors or other identifiable individuals on social media, websites, online forums or messaging platforms where doing so:

- Serves no legitimate purpose connected with crime prevention, safeguarding or evidential reporting;
- Is intended to criticise, ridicule, embarrass, identify, target or encourage complaints against an individual;



- Results in abuse, harassment, threatening behaviour or unwanted attention towards staff, contractors, residents or other individuals.

If you have concerns about the conduct of a member of staff or contractor, these should be raised through our reporting, complaints or safeguarding procedures rather than through the public sharing of recordings.

We may consider the misuse of recordings as anti-social behaviour, unreasonable behaviour, harassment or a breach of tenancy or lease conditions and may take appropriate action in line with our policies and procedures.

Data Protection and Your Responsibilities

Most people use CCTV and recording equipment for personal safety and security.

If your device records only within your home or private garden for personal or household purposes, data protection law will not normally apply.

If your device records people outside your property's boundary, including neighbouring homes, public spaces or communal areas, data protection law is likely to apply.

You remain responsible for how your device records, stores, uses and shares information.

We cannot provide legal advice. Residents should refer to the Information Commissioner's Office (ICO) guidance on home CCTV systems.

If Your Device Records Outside Your Home's Boundary

If your device only records within your home or private garden for personal or household purposes, data protection law will not normally apply.

If it records identifiable people beyond this boundary for example, in a communal area, public space or neighbouring property data protection law is likely to apply. You must:

- Have a clear and justifiable reason for the recording
- Record only what is necessary
- Use privacy zones or masking where available
- Make people aware that recording is taking place, where required
- Keep recordings secure
- Delete recordings when they are no longer needed
- Respond appropriately to people exercising their rights under data protection law. This may include requests for access to personal information, objections to processing, requests for deletion or requests to restrict how information is used
- Not publish or share footage inappropriately

People whose personal information is recorded may have rights under data protection law. Depending on the circumstances, this may include the right to request access to their



personal information, object to processing, request erasure or ask for processing to be restricted. If your recording activities are subject to data protection law, you may need to consider and respond to these requests appropriately.

For further information, read the Information Commissioner's Office guidance on home CCTV systems.

You should regularly review the position, settings and need for the device to make sure it continues to operate in a reasonable and proportionate way.

Individual Needs and Reasonable Adjustments

We recognise that some residents may need recording or door-entry equipment because of a disability, mobility need, communication need, safeguarding concern or risk to their personal safety.

We will consider requests on a case-by-case basis and make reasonable adjustments where required.

This does not mean we will approve an installation that could compromise fire safety, building safety, security or the rights of other residents. Where a proposed installation is not suitable, we will consider whether an alternative location, fitting method or solution could help meet the resident's needs.

Sharing Footage with Us

You may choose to share footage with us if you believe it is relevant to a report, investigation or complaint.

Before sharing footage, please consider whether it is necessary and whether a shorter clip, still image or redacted version would provide the information we need. Where footage contains people who are not relevant to the matter being reported, you should take reasonable steps to limit the sharing of their personal information.

Where possible, please provide:

- The date and time of the incident
- A brief explanation of what the footage shows
- Why the footage is relevant
- Confirmation that the original recording will be kept securely where it may be needed as evidence
- Do not edit, annotate or add audio to the original file

We will decide whether we have a lawful reason to receive, view, keep or share the footage. We will only keep footage that is relevant and necessary for the matter being considered.



We may share relevant footage with the police, courts, legal representatives, insurers, contractors, the Housing Ombudsman Service or other organisations where there is a lawful and necessary reason to do so.

We may decide not to accept or keep footage where:

- It is not relevant to a matter we can investigate
- It records significantly more information than is necessary
- It has been materially altered, or its source and context cannot reasonably be established
- We have reasonable grounds to believe that accepting or retaining it would be unlawful, inappropriate or create an unreasonable information security risk

Providing footage to us does not transfer ownership or control of the resident's CCTV system or the original recording.

We will explain how footage should be shared securely. Footage should not be sent to an individual's personal email account or by an unapproved transfer method.

Access to footage will be limited to those who need it for an authorised purpose. Where footage is kept as evidence, we will record its source, the reason it was collected, any relevant disclosure and when it is deleted or disposed of.

Concerns About CCTV and Recording Equipment

If you are concerned about a neighbour's CCTV, video doorbell or other recording equipment, you may wish to speak to the owner if you feel safe and comfortable doing so. They may not realise their device is causing concern and may be able to adjust its position or settings to resolve the issue.

However, you do not have to approach the owner before contacting us.

If you are unable to resolve the issue yourself, or you do not feel comfortable speaking to the owner, you can contact us for advice and support.

Please contact us if you are concerned that a device is:

- Affecting your privacy
- Recording communal areas unnecessarily
- Causing damage to property
- Creating a safety or security concern
- Being used in a way that causes nuisance, distress or anti-social behaviour
- Not being used in line with tenancy or lease conditions

We will consider each report individually and decide whether any action is needed.



In some circumstances, it may also be appropriate to contact the Information Commissioner's Office (ICO), the police or another organisation that can provide advice or support.

Where a concern relates to anti-social behaviour, harassment, stalking, safeguarding, domestic abuse or another criminal matter, we will consider the report under the relevant Portsmouth Homes policy and will not treat it solely as a data protection issue.

Where appropriate and lawful to do so, we may work with the police, local authority services, support agencies and other organisations.

How we will respond

We will:

- Record the concern and any agreed actions
- Explain what we can and cannot do
- Consider any immediate risks
- Keep the person reporting the concern updated where appropriate
- Avoid sharing their identity unnecessarily
- Consider available information and evidence fairly
- Explain the outcome and any next steps

When We May Ask You to Move, Adjust or Remove Equipment

Where possible, we will work with residents to resolve concerns about CCTV, video doorbells and other recording equipment informally and fairly.

We may ask you to move, adjust or remove recording equipment where it:

- Was installed without required permission
- Damages Portsmouth Homes property
- Creates a fire, building safety, security or access risk
- Records more than is reasonably necessary
- Causes nuisance, distress, harassment or anti-social behaviour
- Interferes with communal systems, inspections, repairs or emergency access
- Breaches a tenancy agreement, lease, permission condition or legal requirement

Where possible, we will explain our concerns and work with you to identify a suitable solution.

Unless urgent action is required, we will:

- Explain the concern



- Consider your circumstances
- Review possible alternatives
- Take account of any disability, safeguarding or personal safety needs
- Confirm any required actions and timescales in writing

Where concerns cannot be resolved, we may withdraw permission or take further action in accordance with tenancy conditions, lease conditions and relevant Portsmouth Homes policies.

Where we incur reasonable costs as a result of unauthorised installation, damage to property or failure to comply with a requirement to remove or adjust equipment, we may seek to recover costs from the tenant, leaseholder or shareholder where permitted under the tenancy agreement, lease or applicable policy.

In some circumstances, we may need to act more quickly where equipment creates a serious fire safety, building safety, electrical, access, security or legal risk.

If You Disagree with a Decision

If you disagree with a decision made under this policy, you may ask us to reconsider it. Please explain why you think the decision should be changed and provide any additional information you would like us to consider.

Where reasonably practicable, the reconsideration will be carried out by a different officer from the one who made the original decision. We will explain the outcome of the review and the reasons for our decision in writing.

You do not need to request a review before making a complaint. If you are unhappy with our decision, how it was reached or how we have applied this policy, you can make a complaint through our Landlord Complaints Policy.

This does not affect your right to seek independent advice or contact the Housing Ombudsman Service.

Your Voice

We provide residents a wide range of meaningful opportunities to engage, influence and scrutinise the Landlord Strategies, policies and services, to include participation in regular resident meetings and give feedback on services and policies.

If you would like to be included in future resident engagement focus groups and would like to know how to get involved, please contact us for more information:

You can contact our team by:

- Email: housing.engagement@portsmouthcc.gov.uk
- Phone: 02392 834835
- Website: visit the [Resident engagement and community resources on our website](#)



What have we done to make sure this Policy is fair?

We completed an Integrated Impact Assessment (IIA) to consider the positive and negative impacts this Policy may have on people with protected characteristics under the [Equality Act 2010](#). This Policy should have direct and positive equality and diversity impacts.

Regulation and legislation

We recognise the variety of legislation, and we will continue to monitor relevant legal guidance. The list below reflects some of the existing legal framework and relevant publications:

- [Social Housing \(Regulation\) Act 2023](#)
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Protection from Harassment Act 1997
- Human Rights Act 1998
- Anti-social Behaviour, Crime and Policing Act 2014
- Protection of Freedoms Act 2012
- Equality Act 2010
- Regulator of Social Housing Consumer Standards
- Information Commissioner's Office guidance on home CCTV systems
- Government guidance on domestic CCTV
- Housing Ombudsman Complaint Handling Code
- Housing Ombudsman Scheme
- Fire Safety Act 2021
- Building Safety Act 2022
- Data (Use and Access) Act 2025
- Environmental Protection Act 1990, where nuisance issues might be relevant
- Crime and Disorder Act 1998, if linked operationally to ASB partnership work
- Protection of Freedoms Act 2012 and Surveillance Camera Code of Practice—relevant principally to CCTV operated by Portsmouth City Council and other relevant authorities.



Related documents

This policy should be read in conjunction with:

- [Portsmouth Homes policies, strategies and reports](#)
- Tenancy Agreement / Leasehold Agreement
- Portsmouth City Council privacy notices
- PCC CCTV policy
- ICO links.

How to feedback

If you have any questions around the policy or would like to know more about its application, please contact the relevant service in the first instance.

You can get this policy in large print, braille, audio or in another language by contacting your Housing Office. More information is available [translation, interpreting and audio information](#).

Compliments

To help us provide the best service we can. We would like to hear customer views on the services that they use. If the customer is pleased with a member of staff or service, please let us know.

- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk

Complaints

If a customer is unhappy, they can refer to our Landlord Complaints Policy.

- Online complaint form at [Make a housing complaint](#)
- Telephone: 02392 606383
- Email address: HNBLandlordComplaints@portsmouthcc.gov.uk

Housing Ombudsman Service

If a customer is unhappy, they can contact the Housing Ombudsman Service for advice and guidance at any time.

- Online complaint form on [the Housing Ombudsman Service website](#)
- Telephone: 0300 111 3000



- For more information, visit [Housing Ombudsman's Complaint Handling Code](#)

