

CCTV Policy – Residential Properties

1. Purpose

- 1.1 This policy outlines the way in which Connexus will use Closed Circuit Television (CCTV) at our residential properties and within domestic communal areas or CCTV systems as part of an access system at our Independent Living Schemes. This policy does not cover CCTV at Connexus' offices, stores and other non-domestic sites.
- 1.2 **Definition:** CCTV is defined as any fixed, semi-permanent or temporary system which captures video (with or without sound). This includes devices such as video doorbells.
- 1.3 This policy also outlines the way in which Connexus will deal with requests from residents to install CCTV.

2. Scope

- 2.1 Scope: The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.

3. Problems to Solve

- 3.1 Connexus has a responsibility to provide an environment where, as far as possible, our customers benefit from the quiet enjoyment of their homes. A key element of this is working to prevent anti-social behaviour and crime in and around our properties and to create safe environments where people want to live.
- 3.2 As a registered provider, Connexus is not subject to the Regulation of Investigatory Powers Act 2000 (RIPA), however to ensure best practice, we will take account of the guidelines set out in the Information Commissioners Office "CCTV Code of Practice" (appendix 1).
- 3.3 We will also adopt the Surveillance Cameras Code of Practice for England and Wales and its 12 guiding principles (appendix 2).
- 3.4 This policy ensures that CCTV is used as an effective tool in preventing and detecting anti-social behaviour and crime whilst ensuring that we are following best practice and acting within the law.

4. Methods

CCTV Used by Connexus

- 4.1 Where customers would like Connexus to install permanent CCTV in their area, they should in the first instance contact their Housing Officer or Independent Living Co-ordinator (ILC).
- 4.2 An initial assessment will always be carried out to determine why CCTV is required together with the likely costs, impact and whether or not planning permission may be required.
- 4.3 Connexus will only agree to the permanent installation of CCTV following consultation with customers that includes the requirement to fund ongoing maintenance using service charges.
- 4.4 Connexus may install a temporary camera either in or on a property for a specific purpose such as dealing with anti-social behaviour or domestic abuse.
- 4.5 The siting of the CCTV cameras will at all times comply with the Data Protection Act 2018 and the appropriate signage will be displayed to ensure that colleagues, customers and visitors are aware that they are entering an area that is covered by CCTV.
- 4.6 All images are recorded and securely stored. This is to ensure the rights of individuals recorded by the CCTV are protected and the information can be used effectively for its intended purpose.
- 4.7 Connexus will follow the National Housing Federations guidance on document retention. Where CCTV images are required for evidence and / or use in court they may be retained for longer periods.

NHF document retention schedule	Function	Record type	Retention trigger	Minimum statutory retention period	Recommended retention period
2.2	Data Governance	CCTV	Date of recording	Minimum time necessary	30 days

- 4.8 Access to recorded images will be restricted to the colleague responsible for management of the relevant area and their line manager. Recorded images may also be viewed by Enforcement Team colleagues in order to collate evidence relating to more significant ASB / tenancy management matters.
- 4.9 We will disclose CCTV footage (by way of a DVD or other suitable method) to:
 - Law enforcement agencies, where it is believed that the images will assist in a legal enquiry.
 - Prosecuting agencies.
 - Legal representatives.

- The media, where a decision has been made by the police that the footage is needed to assist in identification of the Accused of a criminal incident (the wishes of the victim will be taken into account).

4.10 Residents and other third parties may not view CCTV footage, with the exception of residents who have been recorded on the CCTV and make a Data Subject Access Request that has been agreed to.

4.11 Connexus will also meet the guidance set out in the “CCTV Code of Practice” relating to the recording of sound.

CCTV Requested by Customers

4.12 Permission is required from Connexus before a customer can install CCTV.

4.13 Permission will not be unreasonably withheld, however CCTV that captures sound as well as images is deemed as more intrusive and therefore permission for this is unlikely to be given. Connexus recognises that in some cases, CCTV is installed as a safety measure for vulnerable or at-risk customers. These circumstances will be considered when deciding whether permission is granted.

4.14 Should CCTV become implicated in a neighbour dispute or allegation of harassment then Connexus reserves the right to withdraw permission and request that cameras are removed.

5. Measurement

5.1 Connexus will monitor this policy to ensure that it meets good practice and current legislation.

5.2 Where temporary CCTV is used to prevent or investigate anti-social behaviour, Connexus will record the equipment used; the reason for use; the length of time installed.

5.3 Associated documents: -

- Anti-social Behaviour Policy
- Domestic Abuse Policy
- Protection of Freedoms Act

6. Appendices

Appendix 1 – Code of Practice for Surveillance Cameras and Personal Information.

Appendix 2 – The Guiding Principles of the Surveillance Camera Code of Practice

7. Document Control

Approved by SMT	24 February 2022
Approved by Committee/Board	N/A
Effective date	24 December 2025
Review date	28 February 2028
Policy developed by	Senior Housing Services Manager
Consultations	Online via Civiq Area Housing Manager(s)
Associated documents	CCTV Procedure

Version	Author	Date Published	Next Review	Comments
1.0	Corporate Project Manager	27 May 25	30 Nov 25	Changes to terminology to align with new application. Accused to Accused, Affected to Affected.
1.1	Area Housing Manager	24 Dec 25	28 Feb 28	Policy reviewed; no amendments required.

Code of Practice for Surveillance Cameras and Personal Information

Online document available at:

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

The Guiding Principles of the Surveillance Camera Code of Practice

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.