



**COUNCIL HOUSING
PRIVATELY INSTALLED VIDEO SECURITY
SYSTEMS POLICY**

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1.0	First issued	Michael Lerpiniere	15 May 2026

Links to Council Corporate Plan 2025-28

Council ambition	Linked?
Working for a prosperous future We want to ensure the best possible local economy, with opportunities for our tenants to succeed and achieve	Yes/No
Healthier, safer communities Tenants should feel safe in our Borough and supported to be more active in order to improve their health and wellbeing	Yes/No
A greener and cleaner environment It's important to everyone that we look after our environment	Yes/No
Restoring the Council to good health We will place our Council on a sound financial footing and ensure resilience – delivering the service our tenants deserve and expect	Yes/No
We ♥ Castle Point We will help create and maintain the best possible place to live in, work in and visit	Yes/No

Lead Officer responsible for owning the Policy and internal approval body (meeting / board where the Policy is approved for adoption or approved for referral to PFH or Committee for adoption)

Name: [CHRIS STRATFORD, INTERIM DIRECTOR OF HOUSING]

Approved by: [IAN BUTT, DIRECTOR - PLACE AND COMMUNITIES]

Lead Member and Committee responsible for approving Policy:

COUNCILLOR ROB LILLIS, PORTFOLIO HOLDER FOR HEALTH, WELLBEING AND HOUSING

Equality Impact Assessment undertaken? Yes

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1. Introduction

- 1.1 As a responsible social housing landlord, Castle Point Borough Council ("the Council") wants the same opportunity for its tenants and leaseholders to install their own video security systems as a private tenant or owner occupier.
- 1.2 It is recognised that the operation of any recording equipment may be considered to infringe on the privacy of individuals. The Council recognises that it is their responsibility to ensure that all privately installed video security systems used in the communal areas of its Council housing will always comply with all relevant legislation.

2. Scope

- 2.1 The Policy applies to the Council's tenants and leaseholders where privately installed video security systems are installed.
- 2.2 This Policy covers:
- a) Privately installed video security systems (general cameras and recording equipment)
 - b) Self-contained image recording devices (doorbells with integrated cameras, or cameras)
- 2.3 Council installed CCTV is not covered by this Policy. This is covered by the Castle Point Borough Council CCTV Policy.

3. Definitions

The Council	Castle Point Borough Council
CCTV	Closed Circuit television
PIVSS	Privately installed video security systems
ICO	Information Commissioner's Office
Leaseholders	Leaseholders are defined as anyone who owns a property under a leasehold agreement where the Council holds the right to the land on which the property sits.
Privately installed	Installed by a tenant or leaseholder
Tenants	Tenants are defined as anyone who holds and occupies a property that is owned or managed by the Council under a tenancy agreement.

4. Aims and Objectives of the Policy

- 4.1 The aim of this Policy is to:
- a) Provide confidence that data captured on privately installed video security systems are handled in accordance with data protection principles.
 - b) Ensure a consistent approach to the use of privately installed PIVSS and other recording equipment
 - c) Explain the Council's approach to PIVSS installed by tenants and leaseholders
 - d) Outline the advice relating to the use of residential PIVSS provided by the Information Commissioners Office and their guidance relating to a proportionate approach to complaints.
 - e) Ensure that a disproportionate level of resource is not required to monitor the installation and use of PIVSS and deal with complaints from other residents.

5. Policy Statement

- 5.1 The Council recognises that Under the Protection of Freedoms Act 2012, the Council must have regard to the Surveillance Camera Code of Practice (“the Code”), when considering the permission to install a PIVSS. The principles of the Code include:
- a) Use of surveillance camera being for a specified purpose
 - b) User of a surveillance camera must take into account its effect on individuals and their privacy.
 - c) Clear rules, policies and procedures must be in place before a surveillance camera system is used and be communicated to all who need to comply with them.
- 5.2 This policy is written in accordance with the [guidance on domestic CCTV](#) provided by the Information Commissioner’s Office (ICO).¹

6. Legislation, Regulation and Guidance

- 6.1 The Council is committed to ensuring that tenants and leaseholders feel safe and protected from breaches of privacy in their homes and surrounding neighbourhood.
- 6.2 The following list sets out the key legislation, regulation, and guidance:
- The Human Rights Act 1998
 - Regulation of Investigatory Powers Act 2000
 - Equality Act 2010
 - Protection of Freedoms Act 2012
 - Home Office Surveillance Camera Code of Practice – June 2013 amended November 2021.
 - Data Protection Code for Surveillance Cameras 2014 – Information Commissioner’s Office (ICO)
 - Surveillance Camera Code of Practice Level 2 – The Surveillance Camera Commissioner
 - Electrical Equipment (Safety) Regulations 2016
 - Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2018
 - The Regulator of Social Housing Consumer Standards Neighbourhood and Community Standard 2024
 - The Regulator of Social Housing Consumer Standards Safety and Quality Standard 2024
 - Data (Use and Access) Act, 2025

7. Privately Installed Video Security Systems

- 7.1 All tenants are required to obtain permission from the Council before obtaining and installing PIVSS and/or other recording devices including video doorbells.
- 7.2 If a tenant already has a PIVSS and/or other recording device, prior to the start date of this policy, permission to keep them will be considered on a case-by-case basis.
- 7.3 If permission has been granted for installation of PIVSS this is limited to three cameras including a video doorbell. Video doorbells are only permitted attached to a front/back door and cannot be mounted on a gate, door, fence(s) or other structure at or near to the boundary to the property pointing to the highway or communal entrance.

¹ Home CCTV systems Information Commissioner’s Office.

- 7.4 When the Council receives a request to install a video doorbell, that will overlook a communal area in a block of flats, other tenants and leaseholders will be contacted as part of the approval process and made aware of the request and asked if they have any concerns. In many cases the PIVSS owner will have one or more 'legitimate reason' to collect personal information through CCTV. In cases where another agency such as the Police or Social Services advocate for PIVSS as a protection measure permission may be given for a specific period, which will be kept under review by the Neighbourhood Management Officer.
- 7.5 PIVSS should be positioned in such a way to avoid filming into a neighbour's home, neighbouring garden, and have the appropriate filters in place. In cases where another agency such as the Police or Social Services advocate for PIVSS as a protection measure permission may be given for a specific period and kept under review.
- 7.6 If permission is given by the Council for PIVSS which films communal areas and other residents/visitors entering/exiting a property e.g. on the front door of a flat within a block and a complaint is subsequently received then the Council may review its decision to grant consent and consider the legitimate reasons the owner of the PIVSS has and the concerns raised in the complaint and may, in exceptional circumstances, revoke the consent. If the camera was installed without permission and if any permission was conditional (e.g., "subject to removal upon request"), the Council can enforce removal without compensating for the device.
- 7.7 If PIVSS or other recording devices are installed without permission, and the cameras cause a nuisance or are used to harass and intimidate other neighbours the Council reserves the right to take appropriate action to seek their removal. If a device is placed on or fixed to Council property, the Council reserve the right to request its removal within a reasonable timescale, and if this is not actioned by the tenant, the Council may charge the tenant or leaseholder for the cost of doing so and for repairing any damage caused to Council property.
- 7.8 In the majority of cases, retrospective consent, subject to removal upon request will be given for the installation of PIVSS.

8. Rules and Conditions

- 8.1 Permission will be granted on the following conditions:
- a) All work is carried out at the tenant's own cost. The equipment is subject to removal upon request by the Council.
 - b) The Council is not liable for loss, damage, injury, or any third-party claim connected with the works.
 - c) Maintenance of the PIVSS or video doorbell will be the tenant's responsibility for the duration of their tenancy. When a tenancy ends the tenant will be required to remove the PIVSS or video doorbell and make good any damage, at their own cost or, if the equipment is still in place when the tenancy ends, the Council will remove the equipment, and may recharge the outgoing tenant, according to the Council Housing Recharge Policy
 - d) The tenant must sign a consent form agreeing to follow the PIVSS rules.
- 8.2 In order not to impact on other residents, people should point their PIVSS cameras away from their neighbours' homes and gardens.

- 8.3 The PIVSS should have the setting applied to record only within the private space of the tenancy, wherever possible.

9. Neighbour Disputes

- 9.1 If a PIVSS causes a neighbourhood dispute, the Council will review the permission that has been granted. The owner of the PIVSS must not use the video security as a means of harassment, in cases where this happens the Council will revoke any permission previously given.
- 9.2 If there is already an existing neighbourhood dispute which is then escalated by the introduction of PIVSS then the Council reserve the right to withdraw permission.

10. The Resident's Responsibilities

- 10.1 To request in writing permission to install any PIVSS to the outside or inside their home.
- 10.2 To wait for permission before purchasing and installing the PIVSS equipment.
- 10.3 To notify anyone attending their home if there is any recording equipment in their home.
- 10.4 To provide images to the person they have recorded if requested, including other residents, contractors or Council employees.
- 10.5 To regularly or automatically delete recordings.
- 10.6 To make sure wherever possible, the installation and use of the system is only capturing data within the boundary of their tenancy.
- 10.7 Remove the PIVSS if requested to do so in writing by the Council.
- 10.8 To be respectful of the privacy of their neighbours.
- 10.9 To provide access to the Council for the PIVSS to be inspected where necessary.

11. The Council's Responsibilities

- 11.1 To respond to all requests for PIVSS installations within 10 working days for a house or bungalow, and 20 days for a flat in a block. To consult with all residents in the block if the PIVSS is likely to capture their image, and make them aware of the request, asking for their feedback, within 10 working days and then the Council will consider the reasonableness of the request, other resident feedback and provide a written outcome within 20 working days.
- 11.2 The Council reserves the right to enforce this Policy in line with the tenancy agreement Section 6.3 Right to Carry out Improvements "*You may not make improvements, alterations and additions to the Property without our written consent.*" Any such requests must be put in writing.
- 11.3 The Council reserves the right to withdraw permission to have a PIVSS at any time if a tenant or leaseholder does not adhere to this policy. The tenant or leaseholder will be asked to remove the PIVSS (including video doorbell) immediately, and potentially, permanently.
- 11.4 To inspect the PIVSS installed at a tenants or leaseholders home as necessary to effectively manage tenancies.
- 11.5 The Council may be approached by the Police to share video footage recorded by PIVSS, and will contact the data owner to ask they share any footage with the police.
- 11.6 All complaints about PIVSS will be dealt with following the Council's Housing Complaints Policy.

12. Data Protection

- 12.1 The Data Protection Act 2018 and General Data Protection Regulation do not apply to domestic PIVSS or video doorbell installations if they are only trained on and within a domestic property.
- 12.2 The Data Protection Act 2018 and General Protection Regulations 2018 covers recording public highways, shared communal spaces or public footpaths. The tenant or leaseholder is the data owner of all data recorded on their system.
- 12.3 Data protection law says that people who capture images or audio recordings from outside their property boundary using a fixed camera, such as a PIVSS or smart doorbell, should:
- a) tell people that they are using recording equipment;
 - b) in most circumstances, provide some of the recording if asked by the Council or a person whose images have been captured;
 - c) regularly or automatically delete footage;
 - d) in most circumstances, delete recordings of people if they ask; and
 - e) stop recording a person if they object to being recorded, but only if it is possible to do so. For example, if they can point the camera in a different direction but still use it for the same purposes, e.g. keeping their property safe

13. Concerns about PIVSS

- 13.1 If a resident has tried talking to someone who is using PIVSS but has on-going concern about any breach of this Policy, they should contact the Council with any supporting evidence for the Council to review.

14. Data and Records

- 14.1 The Council will maintain records of all requests and the outcomes for privately installed PIVSS. All requests and the outcome will be recorded on the Housing IT system. The Council will keep all records and data in line with its Document Retention Policy and will have robust processes and controls in place to maintain appropriate levels of security for all access related data, including how it will share sensitive information with its contractors.

15. Equality, Diversity and Inclusion

- 15.1 The safety and privacy of the Council's tenants, leaseholders and workforce is of the utmost importance. This Policy has been written to protect all concerned, considering all protected characteristics as set out in the Equality Act 2010.
- 15.2 An Equality Impact Assessment has been carried out (See Appendix 1) which determined that there is no evidence that people with protected characteristics will be negatively impacted by this policy.

16. Communication

- 16.1 Once the Policy is approved, a summary document "a policy on a page" will be placed on the Council's website with a link to the full Policy. An approved version of this Policy will be published internally and accessible to staff.
- 16.2 The Council will include articles in its resident newsletter and on its website that explain its policy on PIVSS.

16.3 The Council will also aim to successfully engage with vulnerable and hard to reach tenants and leaseholders. The Council will share information clearly and transparently and will ensure that information is available to tenants and leaseholders via regular publications and information on its website.

16.4 The Council will ensure that relevant information is communicated in an accessible and understandable way with the aim of protecting the privacy of its tenants and leaseholders and members of their households. This may include clear signage, instruction, and in some cases liaising with those giving support to a tenant (in accordance with Data Protection).

17. Review of Policy

17.1 This Policy will be reviewed every three years, unless new legislation or good practice, or in the event of a relevant major incident means it needs to be reviewed sooner.

18. Consultation

18.1 The Council are committed to meaningful tenant and leaseholder engagement and involvement. The Council intends to consult with tenants and leaseholders on this Policy, once its structure for tenant and leaseholder engagement is in place following the work the Council are doing with the Tenant Participation Advisory Service (Tpas).

19. Training

19.1 The Council will maintain a skills/training matrix to ensure that all Council employees undertaking key roles within the scope of this Policy have appropriate training.

19.2 Training will be carried out to ensure that all staff understand their responsibilities for managing PIVSS.

19.3 Training records will be maintained for all courses attended.

20. Significant Non-compliance and Escalation

20.1 The Council's definition of significant non-compliance is any incident which has the potential to result in a breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred or of the Council employee being made aware.

20.2 Any non-compliance issue identified at an operational level will be formally reported to the Head of Housing Management in the first instance, who will agree an appropriate course of corrective action with the Assistant Director Housing Health and Partnerships. The Assistant Director Housing Health and Partnerships will report details of the same to a member of the Senior Leadership Team which includes the Chief Executive, Director, Corporate and Customer, Director, Commercial and Assets and Director, Place and Communities and Assistant Director, Legal & Democratic Services and Monitoring Officer and Assistant Director, Finance & Procurement (Section 151 Officer).

20.3 In cases of a serious non-compliance the Chief Executive will notify the Leader, Deputy Leader and the Cabinet Member for Health, Wellbeing and Housing.

20.4 In cases of serious non-compliance, the Chief Executive will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or the Information Commissioner's Office.

21. Governance

- 21.1 The Council has overall responsibility for ensuring that this Policy is implemented to ensure compliance with the law.
- 21.2 The Chief Executive reports to Cabinet to demonstrate accountability for data protection across the Council and is accountable for ensuring that general data protection compliance management duties in its landlord function are properly controlled and managed to keep its tenants and leaseholders information safe. Under Section 26 of the Constitution (the Officer Scheme of Delegation) the Chief Executive is authorised to delegate duties to the Directors who are then responsible to take decisions for the effective sub delegation of duties within their service areas of responsibility, this to ensure the Council's statutory duties and functions are effectively discharged.
- 21.3 The day-to-day responsibility for privately installed closed circuit television for the Council's housing stock is implemented in line with this Policy has been delegated, via the Chief Executive, to the Director, Place and Communities. In addition, the Assistant Director Housing, Health and Partnerships is responsible for providing data protection leadership across the Housing Service.
- 21.4 The Director Place and Communities has delegated their duty holder responsibility to the Head of Housing Management who has professional responsibility for the homes and communal areas the Council owns.

22. Associated Policies and Procedures

Castle Point Borough Council Code of Practice on the use of CCTV
CCTV Privacy Impact Assessment
Council Housing Anti-Social Behaviour Policy
Council Housing Domestic Abuse Policy & Procedure
Council Housing Electrical Safety Policy
Council Housing Maintenance and Repairs Policy
Council Housing Neighbourhood Management Policy
Council Housing Recharges Policy
Council Housing Tenancy Management Policy
Repairs Handbook

23. Appendices

Equality Impact Assessment for Council Housing Private Installed Video Security Systems (PIVSS) Policy