

Surveillance Equipment Policy

Document ID/Version:	V1		
Executive Lead (Owner):	Executive Director of Customer Services		
Policy Author:	Director of Customer Services (Settle) Assistant Director of Customer Services (Paradigm)		
Strategic alignment:	N/A - The Social Housing (Regulation) Act 2023 requires housing association to adhere to the Consumer Standards and Complaint Handling Code (the Code). The Data Protection Act 2018 (UK GDPR) provides key requirements include having a clear, lawful reason for using any form of surveillance equipment		
Review frequency:	Every 3 years	☒	Other (state period)
Previous review date:	Settle September 2025/ Paradigm March 2023		
Date policy approved:	5 February 2026		
Policy approved by:	Executive Board		
Next policy review date:	February 2029		
IMPACT ASSESSMENTS			
Equality Impact Assessment			
Completed? ☒	No ☐	Yes ☒	
	If not required, state reason:		
Resident Impact Assessment			
1) Is this one of the agreed policies requiring resident consultation? Please refer to:	Yes ☒	No ☐	
2) If yes, please confirm resident consultation has taken place	☒	Briefly detail changes arising from resident feedback: Minor adjustments made to the scope of this policy following feedback from residents. Now it advises that policy includes details of when permission will be revoked.	
APPROVAL - To show transparency and accountability, specify whether policies have been approved by the Board/Executive/Committee. Clear approval lines strengthen governance, ensuring assurance and accountability.			
Approval journey:	Executive Team	Committee	Board
	☒	Yes ☐	Committee name(s) Add name, otherwise state N/A
			☐
Which Regulatory Standard does this Policy support?	Economic		
	Governance & Viability	Rent	Value for Money
	☐	☐	☐
	Consumer		

	Neighbourhood & Community	Safety & Quality	Tenancy	Transparency, Influence & Accountability
	☒	☐	☒	☐
Associated legislation	Information Commissioner's CCTV Code of Practice Data Protection Act (2018) UK General Data Protection Regulations (UK GDPR) (2018) Surveillance Camera Code of Practice (PoFA 2012) Regulation of Investigatory Powers Act 2000 (RIPA 2000) The Data Use & Access Act 2025			
Associated procedures	Surveillance Equipment Procedure			
Where is this policy to be published?	Website	Intranet	Both	
	☐	☐	☒	

Surveillance Equipment (SE) Policy

1. Policy Statement

This policy outlines how SettleParadigm installs, operates, and monitors surveillance equipment such as CCTV systems, vehicle dashcams, noise-recording devices, drones, and any resident-installed CCTV. It sets the standards, responsibilities, and compliance requirements for all surveillance equipment across our housing portfolio, covering both organisational and resident-operated systems such as doorbell cameras. It also explains why surveillance equipment may be used across our estates, properties, offices, and vehicles, and sets out the requirements for installation, use, maintenance, storage, and legal compliance.

The policy ensures all activity aligns with UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, and other relevant legislation, balancing crime prevention with privacy rights.

2. Objectives, desired outcomes and strategic alignment

- Except for Drones which are used specifically for property repair purposes only, we use surveillance equipment to deter, prevent and reduce the threat of crime and anti-social behaviour; and to protect our properties, homes and assets (i.e. vans).
- Those employed by SettleParadigm understand the legislation relevant to surveillance system requests including UK GDPR, Data Protection Act 2018 and are equipped to manage resident's requests for the installation of CCTV/ doorbell cameras.
- Residents understand when we may accept a request for installing CCTV/doorbell cameras – and the circumstances for which we may refuse or withdraw permission.
- We work effectively with the Police and other partner agencies where requests involve surveillance footage.
- We review and log all requests for surveillance equipment—whether they come from residents or partner organisations - and any decisions to install or replace CCTV.
- Surveillance equipment is used responsibly and lawfully to protect individuals' safety and privacy while complying with all relevant data protection regulations.

3. Scope

This Policy applies to:

- All surveillance equipment installed or operated by SettleParadigm, including systems in our offices and those used to protect assets such as vans.
- All residents living in homes owned or managed by SettleParadigm across all tenures.
- Any resident-installed equipment, such as CCTV and doorbell cameras, and the individuals responsible for using it. The policy also outlines when permission for such equipment may be refused or withdrawn.
- Situations where SettleParadigm is not the freeholder or the property is agency-managed. In these cases, requests will be referred to the appropriate party.

- Where SettleParadigm *does* handle surveillance data (for example, if received from a freeholder or resident), it will be managed in line with data protection legislation, including rights of access.

4. Policy Principles

- We acknowledge that surveillance systems may be needed to help prevent and respond to crime and anti-social behaviour, and the key role we play as an organisation with responsibility for surveillance systems.
- We will consider the use of, or installation of surveillance systems if there is a significant and substantiated risk of harm to individuals or damage to (or loss of) their properties or possessions.
- We will ensure we respond in line with policy to the growing demand, and accessibility of, domestic surveillance systems including doorbell cameras.
- We need to balance our approach with the potential for complaints regarding privacy because of actual or perceived intrusion from using surveillance systems.

Policy detail

Surveillance Equipment Owned & Managed by SettleParadigm

- We will use surveillance equipment such as CCTV to safeguard residents and employees and to assist in the identification, apprehension and prosecution of offenders, as required by law.
- We will consider installing clearly visible (known as overt) surveillance equipment in internal and external shared areas for the purpose of crime/anti-social behaviour prevention.
- Examples of where surveillance equipment may be installed include requests from partner agencies such as the Police, urgent/serious situations which require surveillance equipment coverage or where all other methods of evidence gathering have been exhausted. This will be regularly reviewed by the Community Safety Partner and their line manager
- Surveillance equipment is sometimes used in our neighbourhoods and in our buildings. They are not monitored in real-time but may be if an on-going incident is reported.
- Where installation, or replacement of surveillance equipment is service chargeable, we will consult with residents.
- All overt surveillance equipment will be accompanied by clear signage. No overt camera will be hidden from view and will only cover communal areas or where residents have agreed to it capturing any part of their home or surrounding space as part of the case investigation.
- Where we install or manage surveillance systems, we will ensure that all information including video footage and images are captured, transmitted, and stored securely.
- Downloads are restricted and will only be shared with the Police or other agencies for the purpose of preventing and detecting crime or used by SettleParadigm for the purposes of managing its properties and business purposes. Downloaded images are securely stored and access will be restricted. Any requests for disclosure of surveillance equipment footage will be reviewed and recorded in the surveillance equipment register.
- With the exception of noise recordings for anti-social behaviour investigations, we will not record sound through CCTV systems and will disable any audio recording capability.
- Where live monitoring is in place it will not take place in public view unless the area being monitored is visible public space.
- SettleParadigm will regularly check and maintain surveillance systems. This includes fixing any faults promptly. All maintenance will be completed by trained personnel.

Surveillance systems installed at our offices

This policy also applies to surveillance systems installed and operated within our own offices. The primary purpose of CCTV installed at our offices to prevent and detect crime or vandalism, ensure the safety and security of employees, visitors, and property, and to assist in meeting our health and safety obligations.

Retention of CCTV footage

The retention period for recorded footage will be no more than 90 days. However, footage will be retained beyond these periods if required for ongoing investigations, legal obligations, or other lawful reasons.

Data Protection Impact Assessment

Before the installation of any new surveillance system or significant changes to existing systems, we will undertake a Data Protection Impact Assessment (DPIA). This will enable us to ensure that potential risks to individuals' privacy are carefully considered and that appropriate measures are in place to mitigate those risks in line with data protection legislation. The DPIA process will help ensure that the use of CCTV is necessary, proportionate, and compliant with relevant UK GDPR and other legislation.

The Data Protection Officer will keep a register of each DPIA. This will assist in assessing and mitigating any privacy issues linked to the use of the Surveillance Equipment system.

Third party surveillance systems

Where surveillance equipment is installed and SettleParadigm is not the freeholder, or our properties form part of a multi-landlord or tenure estate, we will not have any jurisdiction over the surveillance system and will refer any enquiries to the responsible organisation.

Police/Law Enforcement agencies (Prevention of Crime)

- We will allow covert monitoring by law enforcement agencies, where we have received a formal request and the criteria has been met in line with the relevant legislation and regulations for using covert surveillance.
- We do not constantly monitor our CCTV systems; however, we will respond to formal and documented requests from the police or other agencies for CCTV images in accordance with the law.

Resident-owned surveillance equipment (including CCTV and smart doorbells)

- You do not need to request permission to install CCTV or smart doorbells providing the installation can be done without causing any damage to the structure of the building or compromising fire-safety. Smart doorbells must be installed next to the door of the property and not installed on the door or doorframe itself.

- The use of recording equipment is limited to your property and must not capture beyond the boundary of your home, this includes capturing neighbouring windows, doors, gardens, communal areas, shared hallways and public spaces.
- In circumstances where this cannot be avoided, careful consideration must be given to the potential impact on the privacy of other residents.
- Where CCTV and smart doorbells capture recordings outside of your boundary, data protection law applies and there are rules you must follow including registering with Information Commissioner's Office.
- Any surveillance equipment installed by residents must be accompanied by appropriate signage.

Equality, Diversity & Inclusion

- We will consider the needs of our residents and make reasonable adjustments for those who may need to install surveillance equipment to ensure we meet our duties under the Equality Act. There is no prescribed list of reasonable adjustments; the adjustment will depend on the resident's individual needs. These will be discussed with residents to reach an agreement on what may be reasonable in the circumstances.
- We recognise that surveillance equipment can impact privacy, and we will ensure that its use is proportionate, lawful, transparent, and necessary.
- Surveillance equipment will not be used in a manner that directly or indirectly discriminates against individuals on the basis of any protected characteristic, including age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

5. Roles and responsibilities

Executive Board are responsible for:

- Approving this policy and any amendments.

Executive Director of Customer Service is responsible for:

- Approving DPIAs following review relating to the installation or use of SE in schemes/properties.
- Ensuring the processes and procedures are in place for permission requests, the release of data, both Subject Access Requests and other third-party requests relating to the use of all SE, other than those at our offices.
- Overseeing the operational delivery and service quality of neighbourhood services and ensuring compliance with this policy and communicating the policy to residents.

Executive Director Property Services is responsible for:

- Overseeing the management of all SE in operation at our offices and Dashcams in our owned vehicles.

- Authorising the viewing and downloading of images recorded via SE at SettleParadigm offices or from SettleParadigm owned vehicles.
- Approving DPIAs relating to the installation or use of SE in offices and vehicles.
- Ensuring the processes and procedures are in place for the release of data, both Subject Access Requests and other third-party requests relating to the use of all SE at SettleParadigm offices and in SettleParadigm owned vehicles.
- Overseeing the management of all Drone operation by the SettleParadigm property repairs team.
- Approving DPIAs relating to the use of Drones by the property team.
- Supporting the approval and installation of SE at SettleParadigm owned properties as required.
- Ensuring the processes and procedures are in place for updating and maintaining the list of SE on a quarterly basis to ensure it is up to date.

The Data Protection Officer is responsible for:

- Ensuring compliance with data protection legislation.
- Escalating concerns with compliance with GDPR to senior management or the Board
- Informing the Information Commissioner's Office (ICO) under the legal requirements where a high risk to privacy has been identified and the risk cannot be mitigated
- Determines the Subject Access Requests procedure to ensure we comply with data protection legislation

All other staff are responsible for:

- Ensuring no SE is installed or put into use by SettleParadigm without referring to this policy and initiating the completion of a DPIA (where appropriate).

6. Compliance/Key Performance Measures

We use SE DPIA templates to ensure all relevant data privacy risks, (such as appropriate signage, appropriateness of equipment, proportionality of purpose etc) are fully considered and mitigated to support a request for installation and use.

DPIAs for any equipment installed or used by SettleParadigm are filed with the Data Protection Officer who will keep a register.

We will carry out regular checks to ensure this policy is followed. Any non-compliance will require corrective action with oversight held by the data protection forum and reported to the Executive Board. All audits and actions taken will be recorded.

7. Related Policies, Procedures and Key Documents

Related Policies

Anti-Social Behaviour Policy

Domestic Abuse Policy

Neighbourhood management Policy

Data Protection Policy

Related Procedures

Surveillance Equipment procedure

Key Documents

Information Commissioner's CCTV Code of Practice

UK General Data Protection Regulation (UK GDPR)

Data Protection Act 2018 (DPA 2018)

Surveillance Camera Code of Practice

Regulation of Investigatory Powers Act 2000 (RIPA 2000)

8. Version Control

Version control			
Date	Version	Approved By	Details of Amendments
February 2026	V1	Executive Board	New integrated Group wide policy