Govanhill Housing Association
Guidance for Ring Doorbells and Personal CCTV

If you are considering the use of doorbell recording devices such as Ring doorbells, you are responsible for the data that you collect and process. Please refer to the ICO's guidance & Police Scotland guidance on domestic CCTV systems to ensure you comply:

ICO - Domestic CCTV systems | ICO
Police Scotland – Police_Scotland_CCTV_Advice.pdf

The ICO's guidance will also provide information for those that are concerned about their neighbour's domestic recording devices.

Doorbell recording devices (e.g. Ring):
Govanhill Housing Association does not require residents to obtain consent for installing a Ring doorbell or similar doorbell recording device. Due care must be taken when fitting any such device to your property and you are responsible for any damage caused and costs for repairs to any damage.

CCTV systems:
If you are considering installing a traditional CCTV (Closed Circuit Television) system to the exterior of your property, you must contact us to seek permission first:

- **Your right to make improvements -** You are not permitted to carry out improvements or alterations to your home unless you first get our permission in writing. Any improvements or alterations must be completed to our satisfaction. When the tenancy ends the improvements and alterations may become our property, or we may ask you to remove them and make good any damage, at your own expense.

  We have a standard application form for improvements, please contact us to receive a copy.

- **Cost of putting right –** You must pay the 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

Considerations for installing domestic CCTV

How can I use CCTV responsibly at my property?

You should ask yourself whether CCTV is actually the best way to improve your home security. Think about the following questions:

- Do I really need CCTV?
- Are there other things I could use to protect my home, such as better lighting?
- What is the most privacy-friendly way to set up the system?
- What areas do I want the cameras to capture?
- Can I position the cameras to avoid intruding on my neighbours' property or any shared or public spaces?
- Do I need to record the images, or is a live feed enough?
- Has my CCTV system got an audio-recording facility? Audio recording is very privacy intrusive.

Think about the problem you are trying to tackle; it will usually be to capture anti-social behaviour or criminality. Govanhill HA encourages reporting antisocial behaviour to us and/or the police.

The law and your responsibilities

If your recording device captures images beyond your property boundary, such as your neighbours' property, communal areas or public streets and footpaths, then your use of the system is subject to the data protection laws.

This does not mean you are breaking the law, and you can still capture images, **but it does mean that you are a data controller**. This means that you will need to comply with your legal obligations as a data controller under the data protection laws, these include:

- Telling people that you are recording e.g. display signs.
- Regularly or automatically deleting footage.
- Stop recording a person if they object to it, e.g. restrict your camera coverage area or point in different direction as appropriate. You may have to provide some of your recording if asked by a person whose images you've captured.

The domestic use of CCTV could be challenged if its use amounted to harassment under the Protection from Harassment Act 1997. The relevance of the legislation would depend on the specific circumstances.

Signs and Security

As an individual data controller, you are expected to:

- Let people know that you are capturing audio/video by putting up signs saying that recording is taking place.
- Make sure that you are not capturing more footage than is required to achieve your purpose for using the system.
- Ensure the security of the footage you capture - in other words, holding it securely and making sure nobody can watch it without good reason. You should therefore be able to demonstrate that the system you are using meets any applicable standards.

Concerns or disputes around CCTV

In most cases, disputes can be resolved by talking. If you believe a user of domestic CCTV is not complying with the rules, you may contact the ICO if you are unable to resolve issues through other means. The ICO cannot force anyone to remove their cameras and it is very unlikely that it will take enforcement action against domestic CCTV users.

If you believe the law is being broken, you can contact the police.

Further guidance and support: