Sanctuary

# Video surveillance: what you can expect from us

This guide explains when and why we may use video surveillance management systems (VSMS). It explains how we protect your privacy, how long we keep recordings and how you can ask to see footage. It also covers the extra safeguards we use when surveillance is part of someone's care and support.

**We will only use surveillance for a clear and lawful reason. We must be satisfied that it is needed, suitable and does not intrude on people's privacy more than necessary. We will consider other options first.**

## Why we may use video surveillance

We may use VSMS to:

- promote child welfare
- support safeguarding
- help deliver care and support planning
- help prevent and detect crime, for example
  - protect customers, colleagues, visitors, homes and other property
  - help identify people who may have committed a crime and provide clear images when needed
  - manage access to doors or sites
  - reduce vandalism and criminal damage
  - help people feel more secure.

Before we install surveillance or continue to use it, we will look at the problem we need to solve and consider other options.

## How we protect your privacy

- We will use cameras fairly and lawfully. We will not discriminate.
- We will display signs or use another clear method to tell people recording is taking place.
- Only staff with a legitimate need will have access to the system.
- We will store recordings securely and maintain the equipment.
- We normally keep recordings for no more than 28 days, then destroy them.
- We may keep specific footage for longer when there is a clear and lawful reason. For example, we may need to keep evidence of a crime, fraud or a disciplinary matter.
- We undertake a Data Protection Impact Assessment prior to any new installation being carried out.

Recording sound is more intrusive than recording images. We do not routinely use audio recording, and this requires the approval of our Data Protection Officer following completion of a Data Protection Impact Assessment. This is a check that helps us understand and reduce privacy risks. We must show there is a pressing need and that other, less intrusive options, will not work.

## When surveillance is part of care and support

If VSMS is proposed as part of your care and support arrangements:

- the need must be clearly recorded and less privacy-intrusive options must be considered
- we must have the right consent, decisions and approvals in place before surveillance starts
- if you cannot make this decision yourself, we must record a decision based on your best interests. We must also put any relevant arrangements in place with commissioners, under the Deprivation of Liberty Safeguards or through the Court of Protection
- the relevant business area must review this use at least once a year, as well as completing any wider reviews for the installation.

Surveillance used for care and support planning must be distinguished from other types of surveillance introduced in response to someone that may be experiencing abuse, neglect or exploitation.

## Services for children and young adults

Where surveillance is used in services for young adults:

- the local authority responsible for the person's accommodation must agree. If not, a court must direct its use or we must agree it with social workers and, where relevant, parents and carers
- monitoring must only take place in communal areas
- in Ofsted-registered services, it must only be used to safeguard and promote child welfare
- children must be told before monitoring starts
- monitoring must be no more intrusive than needed and must respect the child's need for privacy.

## Private domestic surveillance systems

This guide does not cover surveillance systems that customers install in their own homes. This includes requests to install a private system and concerns about a system that is already in place.

We will deal with these requests through the right tenancy management process. Any system must meet the conditions of the tenancy, and you may need our permission before installing it. We do not consider or approve private systems under the VSMS policy.

## Consultation before installation

If we plan to install surveillance in general needs housing, on an estate or in an independent living service we will talk to residents first and record what they tell us. We will do this before we submit the request. Extra requirements may apply if the proposal affects homeowners or shared owners.

## Asking to see footage

You can ask to see footage of yourself. Someone can also ask for it on your behalf. To do this, you or the person acting for you must make a Data Subject Access Request. This is a request for a copy of your personal information. We will review the request before we provide access. Other people or organisations must write to us and explain what they need and why.

In an emergency, we may give the emergency services access without asking for a written request first. We will record what we shared and why.

## Concerns and complaints

You can raise a complaint about how we operate video surveillance through our usual complaints process.