



CCTV Procedure

Fostering & Adoption Services

This procedure facilitates the appropriate use of CCTV by fostering and adoption households.

An individual has the right to use a CCTV system and/or camera doorbell as a security measure in a domestic dwelling for crime prevention and to discourage anti-social behaviour. It is an accepted security measure to have CCTV installed for **external** use on a domestic property.

Foster or adoptive parents who are thinking about installing CCTV **inside** their home must first obtain consent from the agency and the child or young person's placing authority or trust before using it indoors. Approval will only be given in exceptional circumstances and will be carefully considered in light of the rights to privacy and dignity of all children and young people living in the household.

Foster/adoptive parents should have sight of and understand the procedures around CCTV as part of their foster parent agreement.

As part of Polaris community, the term foster parent is preferred but it is recognised that foster carer is also used in legislation and within the community.

This procedure also applies to prospective foster parents who are going through the process of approval. The term '*Adopters*' is used throughout procedures but depending on the context, it may refer to potential adopters, prospective adopters, or those adopters for whom an adoption order has already been granted.

This Procedure forms part of the Group Quality Management system ISO 9001.

Procedure Owner:	QA & Safeguarding Team
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Approved by:	Operations Board
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Next review date:	March 2029
Version No:	03
Associated Procedure and supporting documents:	Request to install CCTV or other recording technology in the home’ consent form
	Polaris Data Protection Procedure
	Health & Safety Checklist / Health & Safety Procedure
	Safer Caring Plans and Risk Assessments

All companies are detailed in the current legal structure

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Procedure:

CCTV outside the home

Where the foster/adoptive parent owns their own home they do not require anybody else's permission to install CCTV cameras outside the home. If the property is rented, the foster/adoptive parent will need written permission from the landlord or owner of the property before installing it.

The agency does not require prior approval before external CCTV is installed; however, foster/adoptive parents are expected to notify the agency when external CCTV is in place, to ensure safeguarding, privacy and allegations management considerations are addressed.

Private CCTV installations used on domestic property may fall within the "domestic purposes" exemption under the Data Protection Act 2018 and UK GDPR. However, this exemption **does not apply where CCTV captures images beyond the property boundary**, where footage is shared with third parties (including agencies or local authorities), or where the CCTV use is connected to a professional fostering or adoption role. Foster/adoptive parents should therefore assume that data protection principles apply unless advised otherwise.

The **Information Commissioners Office**, the UK's independent body set up to uphold information rights, in their guidance on 'Using CCTV on your property' state that, regardless of whether a person's CCTV system is exempt, it should be used in a responsible way to protect the privacy of others. **The guiding principle throughout the deployment of CCTV equipment is to check at each stage 'that its use is necessary and not disproportionate'.**

The ICO's guidance 'CCTV on your property' can be accessed by clicking on this link: <https://ico.org.uk/your-data-matters/domestic-cctv-systems-guidance-for-people-using-cctv/>

If foster /adoptive parents become aware that CCTV or video doorbells from neighbouring properties may be capturing images / videos of their home or garden, they should raise this with their supervising social worker or equivalent, who can provide guidance and support in addressing any privacy concerns in a reasonable and proportionate manner.

The Use of CCTV inside the Home

Foster/adoptive parents wishing to site CCTV cameras internally within their own home should be advised that this type of technology is not routinely recommended or advised by Polaris and CCTV must not be used as a way of supervising or monitoring children and young

people within the foster/adoptive home unless monitoring devices have been agreed as part of a child or young person's care plan.

Internal CCTV in the home may be considered in exceptional circumstances after full consideration by the Registered Manager or equivalent and with consent from the child's responsible Local Authority/Trust and all affected children and young people (where appropriate).

This must be recorded in the Child Specific Safer Caring Plan or equivalent, clearly detailing the rationale, safeguards, duration and review arrangements.

This is likely to only be for serious and significant safeguarding and risk management reasons and must not be used purely for the purpose of managing children's behaviours.

Consent and Recording

A foster/adoptive parent - who felt that there was an **exceptional** reason for using CCTV, or other video or camera surveillance within the home would need to make a request to the agency outlining what these exceptional circumstances were. This must be reviewed by the Registered Manager/equivalent. They would need to seek signed consent from both the agency and from the child's responsible authority/trust using the '**Request to install CCTV or other recording technology in the home**' form (Appendix 1) If agreed this would need to be recorded on CHARMS as '**Internal CCTV in Operation**'.

If consent is received digitally/on email from the LA/Trust this should be uploaded to Charms and linked to the progress action 'Internal CCTV in Operation', likewise if consent is received in paper form this should be scanned and uploaded/linked to the progress action in the same way.

Depending on their age and understanding, the foster/adoptive child and their parents/guardians/those with Parental Responsibility should be given relevant information and also asked to sign the consent to the use of video equipment.

Permission is child-specific. If a child or young person leaves the household, internal CCTV must not continue to be used when a new child joins the household unless the full consent and approval process is repeated.

This must be made clear to the foster parent at the start of the process, so that they have full understanding of how this works including terminating the use of CCTV at any time, the review process and what is required when a child or young person moves from their care. These discussions should be clearly recorded and signed by the foster parent/s.

Use and Operation Conditions

Where internal CCTV is agreed and consent obtained, the following must be adhered to at all times:

- Care must be taken to ensure that its use is appropriate, proportionate and all occupants are aware of its existence.
- It should be clear in the Household Safer Caring plan or equivalent that cameras are in use within the home and state where they are positioned
- Internal CCTV must not be activated when the home is occupied unless this forms part of the agreed exceptional circumstances and is explicitly recorded within the Safer Caring Plan or equivalent.
- **All** members of the household are aware that cameras are in place and why;
- The cameras are only positioned in communal areas and not in bedrooms, bathrooms or toilets; or positioned in such a way that would record these areas.
- It should be made clear to all members of the household what happens to the information captured by the cameras and how this is stored and deleted
- It should be clear to all members of the household that the foster/adoptive Parent(s)/ have full responsibility for the cameras

It should be made clear to all visitors to the home, professional and otherwise that there is internal CCTV in use.

Such CCTV installation will need to be physically checked by the agency's social worker or registered manager, which also includes the devices used to capture and record images. This also needs to be recorded within supervision and within the household safer caring plan or equivalent.

The use of hidden cameras is strictly prohibited. If the Social worker or registered manager detects any hidden cameras or has concerns the foster/adoptive parent is using these, further advice should be sought from a line manager/Central Quality Assurance Team. If a foster/adoptive parent is deemed to be misusing CCTV in this manner, an internal investigation could be initiated.

The information should not be used for any purpose other than protecting the property.

Care must be taken to consider the needs of the child / young person and their reaction to the use of CCTV.

CCTV should not be used where there is evidence or reasonable cause to believe that a child/young person has been subject to abuse or exploitation involving the use of cameras or recording equipment.

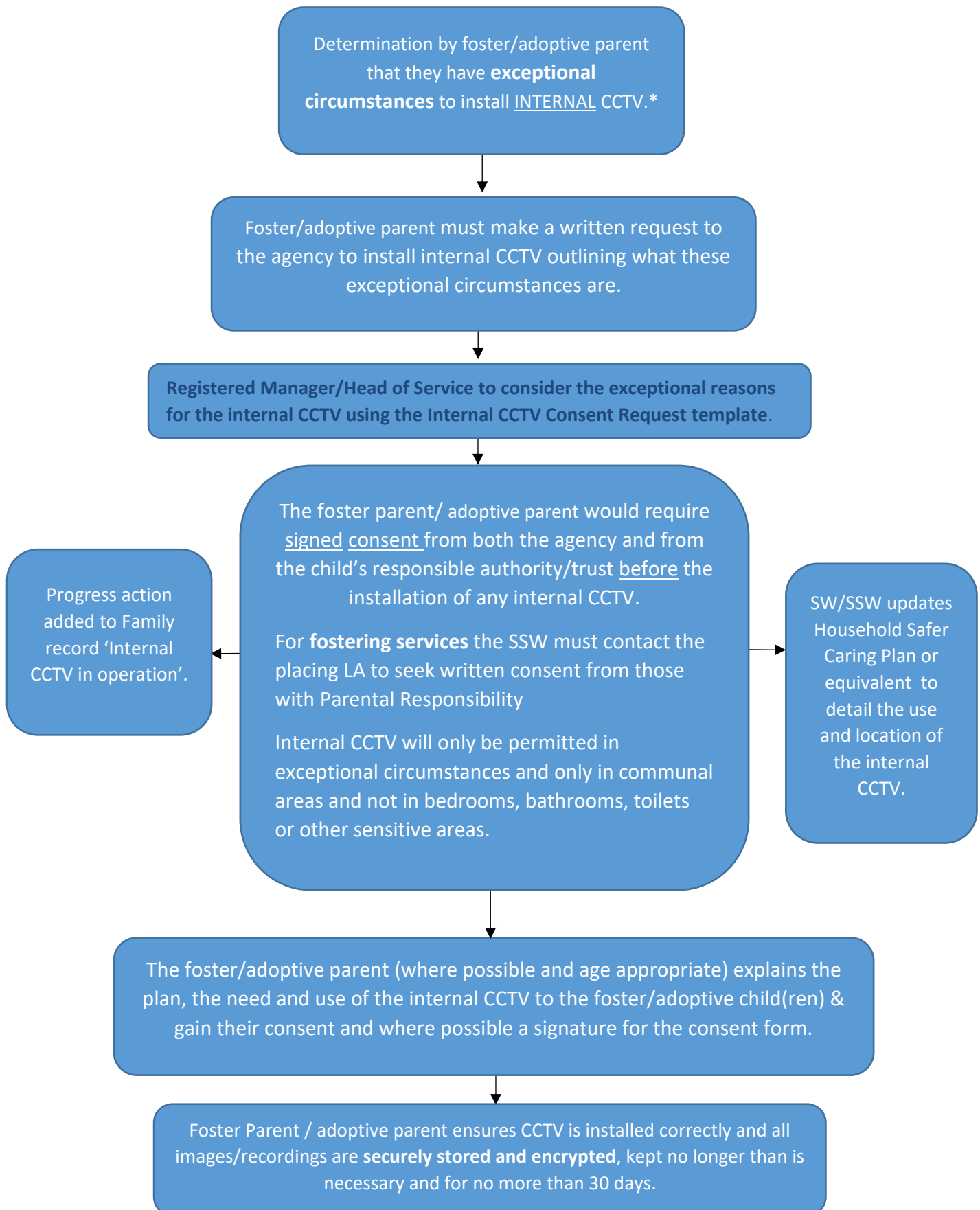
If there are circumstances that require a child / young person's behaviour to be monitored by the use of surveillance technology this must be agreed as part the Safer Caring Plan and

Risk Assessment and be agreed and consented to by all parties including the Local Authority. This must be considered and overseen by a Registered Manager or equivalent.

Adoption-Specific Considerations

In adoption, consideration must be given to the lifelong nature of the arrangement and the absence of an ongoing placing authority following the granting of an Adoption Order. Any agreement to use internal CCTV must be reviewed regularly and must prioritise the child's long-term privacy, dignity and sense of belonging within their adoptive family.

Flowchart for Internal* CCTV Installation:



*If **internal** CCTV is identified as part of a new assessment of Fostering or Adoptive Parent(s) then this must be explored as part of the assessment and considered by the Assessment Manager and Service Manager.

This is likely only to be relevant for foster parents transferring in from another agency or local authority with a child or young person already living with them and **the same process as detailed above would need to be followed.**

This should always be discussed as part of the transfer protocol meeting agenda or equivalent.

Internal CCTV in relation to Adoption/Fostering Panel & Staff Visits/ Supervision/ Professional Phone Calls

1. **Privacy:** Social workers and other professionals have a right to privacy while performing their duties in a foster parents/adopters homes and during Teams meetings and phone calls.
2. **Confidentiality:** Information shared during supervision or visits often contains highly sensitive details about a child's background and care plan. Fostering regulations state that this information is kept strictly confidential.
3. **Consent:** Before any meeting is recorded it is important to get consent from everyone involved.

It is important that no CCTV or recording devices are in use during fostering/adoption panel sessions which the foster/adoption family are attending remotely via Microsoft Teams. The panel should be made aware if the foster/adoptive home has CCTV, where it is located and the panel chair will ask for reassurance that it is not in use to capture any panel video or voice recordings.

Any refusal to turn off CCTV which may pick up panel discussions may result in the panel being aborted and the family should be made aware of this prior to panel attendance.

Baby monitors & Other recording devices

Baby monitors are recognised as essential safety equipment for babies who are developmentally ready to sleep in a separate room. Their use must be recorded in placement plans, safer caring plans and risk assessments. (see safer Sleeping Procedure for further guidance). The use of baby monitors will be subject to review and consideration of removal when the child is of sufficient age not to require such monitoring.

Baby monitors must not be used as covert listening or recording devices and must not be used to monitor older children or other household members.

Baby monitors as with CCTV can also film, record and relay sound to a receiver as well as mobile phones. Anyone affected by the use of this equipment should be made aware of its existence as appropriate and the use of baby monitors should be recorded in placement plans, safer caring plans and risk assessments. It is acceptable for a mobile phone to be used as a baby monitor when a baby is sleeping, but it must not be used to monitor other people's activities. Baby monitors should not be used as a device for supervising older children.

Other internal recording devices (including pet cameras, smart assistants, tracking apps, dashcams or static camera equipment) that have the capability to record images, sound or location data must follow the same approval and consent process as internal CCTV.

Any installation or use of recording equipment not in accordance with this procedure will be taken seriously and may result in formal action, investigation or review of approval status.

Responsibility for the CCTV System including storage and retention of images

- It is essential that it is clear to the foster/adoptive parent - that they are responsible for the CCTV system. This will include correct installation, responsibility for all information recorded by the system and its appropriate use.
- **It is the responsibility of the foster/adoptive parent to ensure that all data that is stored is both secure and encrypted whether that be on an SD card or a 3rd party cloud storage.**
- The system should be recording dates and time accurately and have enough recording space for the time span that it is required to record.
- The foster parent/adopter should ensure that the information recorded by the system is only used for the purpose for which it is intended.

Where footage is required for safeguarding, allegations or legal purposes, the agency and placing authority/trust must be informed immediately. Access to, viewing, copying or sharing of footage must only occur following senior management approval and in line with the Polaris Data Protection Procedure.

CCTV must not be installed or used for the primary purpose of gathering evidence in relation to safeguarding concerns or allegations.

Where external CCTV footage captures an incident involving a child or young person, the agency must be informed and any access to or sharing of footage must be agreed by senior management in line with the Polaris Data Protection and Allegations Procedures.

Subject Access Requests

Where a foster parent/adopter installs and operates CCTV within their own home, they are the data controller for that system. Recorded footage may be subject to Subject Access Requests (SAR) under UK GDPR. Responsibility for responding to any Subject Access Request (SAR) relating to that footage rests with them, not the agency. The agency must be informed immediately before any footage is shared. Any request for access to CCTV footage must be referred immediately to the agency's Data Protection Officer and managed in accordance with the Polaris Data Protection Procedure.

A SAR made to the agency applies only to information held by the agency (e.g., placement records, assessments, correspondence). It does not automatically extend to privately held CCTV footage owned and controlled by foster parents/adopters.

Specific Evidence: If a foster parent/adopter has already shared specific footage with the agency (e.g., as part of an investigation or for safeguarding evidence), that specific clip becomes part of the agency's records and must be considered for disclosure.

Additional guidance/legislation/References:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Information Commissioner's Office (ICO) – including guidance on domestic CCTV and surveillance
- National Minimum Standards for Fostering Services (England, 2011) – Standard 26: Records (including confidentiality and information sharing)
- Health & Social Care Standards (Scotland) – Standard 2.7 (use of surveillance and monitoring) and Standard 2.14 (information sharing)
- Regulated Fostering Services (Service Providers and Responsible Individuals) (Wales) Regulations 2019
- The Foster Placement (Children) Regulations (Northern Ireland) 1996 (as amended)
- Human Rights Act 1998 (Article 8 ECHR – private and family life)

Review Dates

Reviewed Aug 2024.

Reviewed March 2026. General review and updated to tighten privacy rights of staff/visitors and to reflect SARs.

Appendix 01



Consent Request to Install CCTV or Other Recording Technology Inside The Home

Name of Foster/Adoptive Parent (s)	
Placing LA/Trust:	
Name of Child(ren) Placed with Foster Parent / Adoptive Parent(s)	
Name of LASW:	
Name of Agency SW/SSW	
Details of requested CCTV system or alternative technology:	
Exceptional reason that CCTV is deemed as required in the home:	
Where will the camera/s be positioned and located?	

Please provide confirmation that all members of the household are aware that cameras are in place and the reasons, and that the CCTV is not being used to supervise the children in the placement.

Explain how the recordings will be stored and encrypted and for how long? (no more than 30 days)

Foster/Adoptive Parent declaration:

I understand that I am responsible for the correct installation of the CCTV system and all information recorded by it. I will store its data securely, and for no more than 30 days. I will ensure that everyone in my home who is subject to the CCTV recordings is notified of this fact.

Signature:	Date:
(Please note if digitally signed)	

Foster/adoptive Child's Signature (if age appropriate)

Signature:	Date:
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Parents/Those with Parental Responsibility/Guardians Signature (if appropriate)

Signature:	Date:
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Agency and Local Authority/Trust authorisation:

I agree to the use of internal CCTV or alternative technology in the foster home, as detailed above.

Agency Registered Manager or Equivalent:	Date:
(Please note if digitally signed)	

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<u>Local authority/trust Social Worker:</u>	Date:
(Please note if digitally signed)	

***Upload this form to charms and link this consent to the progress action 'Internal CCTV in Operation'**