



DDS Group Residential Services Provider Advisory: Cameras in Common Areas¹

November 2025

Purpose and Scope

The use of video cameras in the common areas of group residential settings can benefit individuals¹ supported by the Department of Developmental Services (“DDS” or the “Department”) by monitoring the interactions between individual, staff, and others, and providing a factual record of events and incidents that occurred in the home. However, cameras in common areas can also diminish the sense of comfort and normalcy in a residential setting and infringe on the personal privacy of individuals. The responsible use of cameras in residential settings is a balance between ensuring safety and upholding the fundamental rights of service recipients.

This advisory, along with the accompanying Requirements for Camera Use in Group Homes, provides the framework under which DDS residential providers² must seek authorization from DDS for the use of cameras in common areas of residential settings.

The scope of this advisory is limited to the use of video cameras in common areas of group residential settings contracted and/or licensed by DDS. **Audio recording is strictly prohibited.**

Common Area Definition

Common areas in typical group residential settings include (but are not limited to) foyers, hallways, living areas, dining areas, and other shared communal spaces. No cameras may be installed in private areas where personal care and hygiene activities are performed such as bedrooms, bathrooms, changing areas, or any other space where individuals have a reasonable expectation of privacy. The prohibition of camera installation in private areas must be explicitly stated in the Agency Camera Use Policy (Use Policy) described below.

Core Principles

The anticipated benefits of using cameras must be balanced with considerations of the potential impact on the privacy, dignity, and human rights of individuals. All decisions and actions related to camera use in group residential settings must adhere to the following core principles:

- **Privacy:** Individuals have a fundamental right to privacy within their home environment. Camera use must be minimized and limited to public or common areas where and when a legitimate purpose for surveillance exists.

¹ The term “individual” used herein has the same meaning as defined in 115 CMR 2.01.

² The term “provider” used herein has the same meaning as “provider” defined in 115 CMR 2.01

- **Autonomy:** Individuals have the right to make decisions about their lives and environment. Their preferences and input regarding camera use, where appropriate and feasible, must be considered. Individuals and/or their guardians or legal representatives must be contacted and engaged any time the use of cameras is being considered.
- **Dignity:** All individuals must be treated with respect and their inherent worth must be recognized. Camera use must never be demeaning, intrusive, nor diminish an individual's sense of self-worth or control.
- **Necessity and Proportionality:** Cameras should only be used when there is a clear, legitimate, and documented need, and the scope of surveillance must be proportionate to the identified need. Less intrusive alternatives must always be considered first, and the least restrictive strategies should be tried and documented before resorting to more stringent measures to meet the need.
- **Transparency:** Individuals, their guardian(s)/legal representative(s), and staff must be fully informed about the presence, purpose, and scope of camera usage.

Use Policy and Site Proposal Development

Prior to placing a camera in a common space of a DDS-contracted or licensed group residential setting, the provider must submit the Use Policy and a site proposal for DDS review and approval.³ The Use policy is an agency-wide policy, while the site proposal is location-specific. The Use policy must address the provider's use of the camera(s), while the site proposal includes location-specific information for the building in which the camera(s) are being proposed.

DDS Review

The Area Office will review the provider's proposal. If supported, the Area Office will forward the proposal to the Regional Director for review. Proposals supported by the Regional Director will be submitted to a Central Office committee composed of DDS senior staff, including the Deputy Commissioner of Operations, Regional Directors, Assistant Commissioner of Quality Management, Director of Human Rights, Privacy Officer, and General Counsel. The committee will issue a decision within 45 days of receipt of the proposal. Additional information may be requested during any part of the review process. If DDS rejects the proposal, the provider may revise and resubmit the proposal for reconsideration.

If at the time of the issuance of this advisory, a group residential provider already has cameras installed in the common area of a DDS-contracted and/or licensed residential setting, the provider must submit a Use Policy and site proposal to the Area Office for review and approval within 90 days.

For questions, please contact Office of Human Rights at: officeofhumanrights@mass.gov.

Rev. November 2025 by DDS Operations, Office of Quality Management, and Office of Human Rights

³ Provider must submit the Use Policy to DDS whenever submitting a site proposal, even if provider has already submitted their Use Policy to DDS for a previous site proposal. If a provider is submitting multiple site proposals at one time, only one Use Policy need accompany the provider's submission.