

CCTV policy

This policy describes how we comply with data protection legislation requirements in our use of CCTV.

Ownership and operation of CCTV

Tim McDonogh has overall responsibility for CCTV at the practice and the images produced.

Infocus Security Systems Ltd is responsible for installing and maintaining the CCTV equipment and storing the images produced. It processes information on behalf of Tim McDonogh who is ultimately responsible for the information obtained from CCTV use at the practice.

The CCTV is continuously operational.

Purpose of CCTV

We use CCTV recording to:

- Protect the practice premises and property
- Increase the safety of practice patients, staff and visitors
- Deter criminal activity and anti-social behaviour
- Assist in the apprehension, identification and prosecution of offenders
- Provide evidence to a court or tribunal
- Comply with a legal obligation.

Location of CCTV

CCTV cameras at the practice cover the following areas:

Basement

X-Ray room	directed at the CBCT machine/entrance
X-Ray office	directed at the computer/Changing room door

Ground Floor

Reception	directed over the desk towards the entrance
Office	directed over the entire office towards the hatch
Landing	directed towards the front door

Outside

Front of the building	directed towards the front door including the forecourt
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Side of the building directed towards the steps/back door

First Floor

Waiting room directed over the whole waiting room towards the door

Landing outside surgery 3 directed over the landing to include the stairs

The CCTV does not have audio recording capability.

The CCTV monitor (screen) is located in the cupboard in the white room. Only Tim McDonogh and Alex Mogg hold the password. The images can also be accessed by Tim McDonogh and Alex Moggs mobile phone using a virus secure app.

[Use of CCTV recordings](#)

CCTV images and recordings are personal information and, when using or processing the information, we will respect the legal rights of the individuals shown in the recordings.

We will not share images or recordings except in the following circumstances:

- If requested by the local authority, police or courts for the investigation, prevention or prosecution of anti-social behaviour or criminal activity
- For bringing or defending a legal claim
- To comply with a police, warrant or an order given by a court or tribunal.

Access to the CCTV monitors and/or recorded images, for the purposes listed above, is restricted to Tim McDonogh and Alex Mogg

The CCTV equipment will be checked regularly to ensure that it is in good working order and images recorded are of a sufficient quality to be used for the purposes listed.

CCTV images and recordings will be kept for 3 months unless they are being used in the investigation of an incident (for example theft, damage or violence). After this time or following the conclusion of an investigation, the recordings will be destroyed and/or irretrievably deleted.

[Requests for CCTV recordings](#)

Requests by individuals for recordings of themselves are will be processed in line with the practice policy on access to information.

Requests by third parties (such as law enforcement agencies or lawyers) for practice CCTV recordings should be submitted in writing to the practice manager Emma Stubbington, she will then:

1. Verify the identity of the person / organisation and takes a copy of any identification documents, if required.
2. Decides whether providing the CCTV recording would satisfy one or more of the purposes listed in this policy.
3. Considers the rights of the individuals shown in the CCTV and balance the protection of these rights against the reasons for the request. Some images may require editing to protect the privacy of individuals.
4. If appropriate, transfers the requested CCTV recordings / images securely to the third party.
5. Keeps a record of the disclosures of CCTV to the third party.

If unsure about providing the requested information to a third party, the practice manager Emma Stubbington should seek advice from the practice owner Tim McDonogh or the Information Commissioner's Office (ICO).

Review

This policy will be reviewed annually as stated in the attached checklist.

Complaints

Any concerns or complaints about this policy should be raised with the Tim McDonogh or Alex Mogg. If the concerns cannot be resolved, the practice may seek advice from the ICO.

Signed: Dr Tim McDonogh

Date: 31/03/2020

Date for Review: 03/2020

Version 1 BDA

Review checklist
2020

Action	Date checked	Checked by	Review date
Privacy impact assessment conducted	31/03/2020	Lucy Goulding	Mar 2021
ICO notified that CCTV recordings are made at the Practice, and next renewal date noted	Spoke to the ICO on 16.04.19 under the Data Protection Act 2018 we are no longer required to inform the ICO that we use CCTV. This is included in our current registration	Lucy Goulding	N/A
Following problems identified: Deter criminal activity and anti-social behaviour Less intrusive alternatives to CCTV surveillance considered but concluded that CCTV is best way to address these issues	31/03/2020	Lucy Goulding	Feb 2020
Potential impact on individual privacy identified and considered	31/03/2020	Lucy Goulding	Mar 2021
The CCTV system produces clear images that can be used for the intended purpose	31/03/2020	Lucy Goulding	Mar 2021
CCTV cameras positioned to cover the areas to be monitored. Images of people who are not entering the practice are not captured	31/03/2020	Lucy Goulding	Mar 2021
Visible signs show that CCTV is in	31/03/2020	Lucy Goulding	Mar 2021

operation			
Data processing agreement in place between the practice and the CCTV system providers	31/03/2020	Lucy Goulding	Mar2021
A practice policy explains how individuals can obtain copies of their own images	31/03/2020	Lucy Goulding	Mar 2021
CCTV images are retained only for as long as is necessary and then securely deleted (2 months)	31/03/2020	Lucy Goulding	Mar 2021