

Closed Circuit Television (CCTV) Monitoring Policy

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1	28/01/2023	Kim Austin	Jane Donnelly	Minor updates
2	07/11/2024	Tess Foster	Kim Austin	Edited throughout

Introduction

Policy statement

The safety and security of staff, patients, contractors and visitors at Parishes Bridge Medical Practice is of paramount importance. To support the management team in maintaining a safe and secure environment, a closed-circuit television (CCTV) system is used within the practice.

This system has been installed and is used in accordance with extant legislation:

- [Data Protection Act 2018](#)
- [Surveillance Camera Code of Practice 2013](#)

This document has been produced to provide all staff with the necessary information regarding the use of CCTV and how to respond to patients who make enquires relating to the CCTV system, while explaining how to respond to access requests for data generated by CCTV systems.

This policy is to be read in conjunction with the practice's [UK GDPR policy](#).

Status

The practice aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the [Equality Act 2010](#). Consideration has been given to the impact this policy might have regarding the individual protected characteristics of those to whom it applies.

Use of CCTV

Purpose

The purpose of CCTV at the practice is to:

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- Protect the safety, security and wellbeing of staff, patients, visitors and contractors
- Prevent and detect crime within the practice and may be used to support the prosecution of offenders
- Facilitate learning through reflection because of incidents occurring within the monitored areas

CCTV will not be used for any purpose other than those specified above.

Data Protection Impact Assessment (DPIA)

For surveillance systems, the practice must take a data protection by design and default approach and perform a DPIA for any processing that is likely to result in a high risk to individuals. This includes:

- Processing special category data
- Monitoring publicly accessible places on a large scale
- Monitoring individuals at a workplace

The practice should assess whether the use of surveillance is appropriate and, as part of the assessment, should consider the reasonable expectations of the individuals whose personal data is processed and the potential impact on their rights and freedoms. The practice will record its considerations and mitigations in a DPIA prior to the use of a surveillance system that is likely to result in a high risk to individuals.

If high risks cannot be mitigated, prior consultation with the Information Commissioners Office (ICO) is required and the practice cannot proceed with the processing until guidance has been received from the ICO. An example DPIA can be found in the [UK GDPR Policy](#).

Location

At the practice, all cameras are overtly positioned and do not impede upon any clinical areas. Appropriate signage is prominently displayed in all areas covered by the CCTV system.

The [ICO](#) explains that signs must be placed prominently before the entrance to the system's field of vision and reinforced with further signs within the area. They should be positioned at a reasonable distance from the places monitored and in such a way that individuals can easily recognise the circumstances of the surveillance before entering the monitored area.

Retention and deletion of images and information

Principle 6 of the [Surveillance Camera Code of Practice](#) states that images and information obtained from a surveillance camera system should not be retained for longer than necessary to fulfil the purpose for which they were obtained in the first place. A proportionate approach should always be used to inform retention periods and these should not be based upon infrequent exceptional cases.

Although images and other information should not be kept for longer than necessary to meet the purposes for recording them, on occasions a system operator may need to retain images

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for a longer period, for example when a law enforcement body is investigating a crime to give them the opportunity to view the images as part of an active investigation.

At the end of the retention period, all images are deleted appropriately.