

THE WATERLOO PRACTICE

Closed Circuit Television Monitoring Policy

Version:	Review date:	Edited by:	Approved by:	Comments:
1.1	12.04.2022	Nicole Siswick	All Partners	

Table of contents

1	Introduction	3
1.1	Policy statement	3
1.2	Status	3
1.3	Training and support	3
2	Scope	3
2.1	Who it applies to	3
2.2	Why and how it applies to them	4
3	Definition of terms	4
3.1	Closed Circuit Television (CCTV)	4
3.2	Undirected surveillance	4
3.3	General Data Protection Regulation (GDPR)	4
3.4	Surveillance Camera Code of Practice 2013	4
4	GDPR and Data Protection Act 2018	5
4.1	GDPR	5
5	Use of CCTV	6
5.1	Purpose	6
5.2	Location	6
5.3	Retention of images and information	7
5.4	Accessing retained images and information	7
5.5	Third party requests for access to images and information	8
5.6	Disposal of images and information	8
5.7	Complaints	8
5.8	Access register	8
5.9	Audit	8
6	Summary	8
	Annex A – CCTV signage	9

THE WATERLOO PRACTICE

Annex B – Access register

9

THE WATERLOO PRACTICE

1 Introduction

1.1 Policy statement

The safety and security of staff, patients, contractors and visitors at The Waterloo Practice is of paramount importance. To support the management team in maintaining a safe and secure environment, a Closed-Circuit Television system (CCTV) is used within the organisation.

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

- [Equality Act 2010](#)
- [GDPR \(General Data Protection Regulations\)](#)
- [Data Protection Act 2018](#)
- [Surveillance Camera Code of Practice 2013](#)

All are referenced throughout this policy.

1.2 Status

The organisation 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 that this policy might have with regard to the individual protected characteristics of those to whom it applies.

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment.

1.3 Training and support

The organisation will provide guidance and support to help those to whom it applies to understand their rights and responsibilities under this policy. Additional support will be provided to managers and supervisors to enable them to deal more effectively with matters arising from this policy.

2 Scope

2.1 Who it applies to

This document applies to all employees of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers, locums and contractors, are encouraged to use it.

Furthermore, it applies to clinicians who may or may not be employed by the organisation but who are working under the Additional Roles Reimbursement Scheme (ARRS).¹

¹ [Network DES Contract specification 2020/21](#)

THE WATERLOO PRACTICE

2.2 Why and how it applies to them

This document has been produced to provide all staff at The Waterloo Practice with the necessary level of information regarding the rationale for the use of CCTV systems in general practice and how to respond to patients who make enquires as to the use of such systems whilst also explaining how to respond to access requests for data generated by CCTV systems.

3 Definition of terms

3.1 Closed Circuit Television (CCTV)

CCTV (also referred to as surveillance camera system) is a system used for the recording and viewing of visual images for surveillance purposes.

3.2 Undirected surveillance

The gathering of images and information which is not targeted at any one individual

3.3 General Data Protection Regulation (GDPR)²

A legal framework which sets guidelines for the collection and processing of personal information of individuals within the EU

3.4 Surveillance Camera Code of Practice 2013³

The code details twelve guiding principles which strike a balance between protecting the public and upholding civil liberties. These are:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.

² [General Data Protection Regulation 2018](#)

³ [Surveillance Camera Code of Practice](#)

THE WATERLOO PRACTICE

5. Clear rules, policies and procedures must be in place before a surveillance camera system is used and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted. The disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are compiled within the organisation with regular reports being published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

3.5 Data Protection Act 2018⁴

The UK data protection laws which complement the European Union's General Data Protection Regulation (GDPR)

4 GDPR and Data Protection Act 2018

4.1 GDPR

The Waterloo Practice has a legal requirement to ensure compliance with the GDPR and that personal data will be:

⁴ [Data Protection Act 2018](#)

THE WATERLOO PRACTICE

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”)
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

4.2 Data Protection Act 2018

GDPR gives member states limited opportunities to make provisions for how it applies in their country. One element of the DPA 2018 is the details of these. It is therefore important that the GDPR and the DPA 2018 are read side by side.⁵

5 Use of CCTV

5.1 Purpose

The purpose of CCTV at The Waterloo Practice is to:

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

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

5.2 Location

CCTV cameras are positioned in the following locations:

⁵ www.ico.org.uk/for-organisations/data-protection-act-2018/

THE WATERLOO PRACTICE

- Outside over back car park x 2
- Over the front entrance (main road side)
- Over reception front desk

Cameras are all overtly positioned and do not impede upon any clinical areas within the organisation. Appropriate signage (see [Annex A](#)) is positioned throughout the organisation in the following locations:

- Outside wall rear car park
- Outside wall by front entrance (main road side)
- On wall in waiting room near front desk

5.3 Retention of images and information

A proportionate approach is used to inform retention periods. However, images and information acquired from the surveillance system at The Waterloo Practice will not be kept for longer than is necessary.⁶ There may, however, be occasions where it is necessary to retain images for a longer period, i.e., when a crime is being investigated.

The agreed retention period for CCTV images at The Waterloo Practice is 4 weeks. All information is saved on a cloud-based system which is encrypted.

5.4 Accessing retained images and information

Access to retained images is restricted to the Management at The Waterloo Practice. In their absence, the partners are authorised to access the retained images and information.

There may be, on occasion, requests by data subjects (individuals) to access images and information which are held about them. In accordance with the GDPR, all data subjects have a right to access their data and any supplementary information held by The Waterloo Practice. Data subjects have a right to receive:

- Confirmation that their data is being processed
- Access to their personal data
- Access to any other supplementary information held about them

The purpose for granting data subjects access is to enable them to verify the lawfulness of the processing of data held about them.

When a request to access images and information is received, the data subject is to be advised to complete the organisation's subject access request form. In line with GDPR, no fee can be charged for processing such requests.

Data controllers must respond to all data subject access requests within one month of receiving the request as per the [Access to medical records policy \(including SAR template\)](#)

⁶ [Surveillance Camera Code of Practice – Principle 6](#)

THE WATERLOO PRACTICE

5.5 Third party requests for access to images and information

Requests may be received from third parties to access images and information. Such instances include requests from solicitors to support either a claimant or defendant where a crime has been alleged.

The data controller must be able to satisfy themselves that the person requesting the data has the authority of the data subject. The responsibility for providing the required authority rests with the third party and is usually in the form of a written statement or consent form, signed by the data subject.

5.6 Disposal of images and information

As stated in paragraph 5.3, the images and information are stored for 4 weeks after which they are deleted. The deletion process is automatic.

5.7 Complaints

Should a patient, visitor or contractor have cause to complain about the organisation's CCTV system, the data controller should be contacted.

Patients, visitors and contractors are to be advised that complaints will be processed in accordance with complaints policy.

5.8 Access register

The template at [Annex B](#) is to be used to record all access to the CCTV system.

5.9 Audit

The template at [Annex C](#) is to be used to audit the CCTV system at The Waterloo Practice.

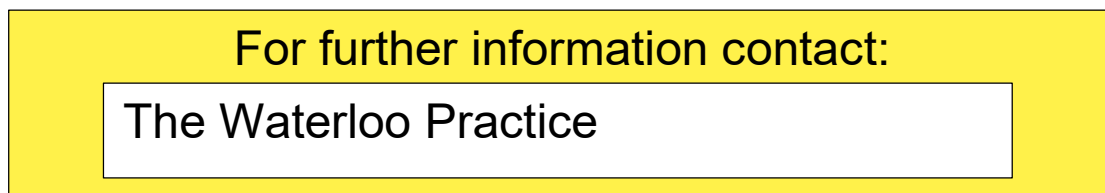
6 Summary

CCTV systems are valuable tools which enhance the safety, security and wellbeing of services, staff and patients at The Waterloo Practice and are an increasingly common sight in GP practices.

In line with the relevant legislation and code of practice referenced in this policy, it is essential that the use of such systems and the staff who use them are compliant and that all guidelines and processes are complied with.

THE WATERLOO PRACTICE

Annex A – CCTV signage



Annex B – Access register

The Waterloo Practice	Data controller: Practice Management
CCTV System Access Register	

THE WATERLOO PRACTICE

Date	Time	Reason for access	Outcome	Individual
<i>EG:</i>	<i>14.30</i>	<i>Deletion of images in accordance with organisation policy</i>	<i>All images deleted successfully</i>	<i>Practice manager</i>
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				