

## Transparency Notice for Closed Circuit Television (CCTV)

### Purpose of Processing

St Thomas Medical Group has installed Closed Circuit Television (CCTV) cameras at St Thomas Health Centre and Exwick Health Centre for the purposes of:

- Protecting staff, patients, visitors, and contractors.
- Helping to provide a safer environment for our staff, patients, and other visitors.
- Monitoring operational and safety related incidents.
- Preventing and investigating crime and anti-social behaviour on the premises and may be used to support prosecution of offenders.

The cameras will be activated by movement and there will be clear signage in areas where CCTV is in operation.

### Legal basis for processing

Under the UK GDPR our legal bases for processing are:

Article 6 (1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Article 9(2)(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in [paragraph 3](#).

Article 9(2)(i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

### Categories of Personal Data

Images only, the CCTV will not capture audio.

### Right of Access

Under the current Data Protection legislation, you have a 'Right of Access' this means that you can make a Subject Access Request to receive a copy of the CCTV footage where you can be identified.

We reserve the right to withhold information where permissible by the UK General Data Protection Regulation (GDPR) 2018 and/or the Data Protection Act 2018 and we will not be able to release the information to you if:

- We no longer have a copy of the requested data.
- We are unable to identify other individuals in the footage to gain their consent to share.
- Other individuals identified in the footage have not consented to the sharing.

Requests should be directed to [stthomas@nhs.net](mailto:stthomas@nhs.net) for the attention of the Data Protection Officer. Please include some photographic ID and we ask that the details you provide contain sufficient information to identify you and assist us in finding the images on our systems (for example, which surgery was visited, the date and time of the visit, and any identifying features/clothing)

### **Data Sharing**

In certain circumstances (investigations, serious or criminal incidents), we may need to disclose CCTV data for legal reasons.

When this is done there is a requirement for the organisation that has received the images to adhere to the UK GDPR.

### **Data Retention**

Recorded footage is secure and encrypted and only authorised staff will have access to this. Footage will be retained for 4 weeks, unless it is required for evidence or to support further investigation, after 4 weeks data is overwritten, and we no longer have access to it.