

# Broomfield Park Medical Centre – CCTV Policy and Code of Practice

Ratified: February 2020

Last Edited: February 2020

By: Nathan Moore; Practice Manager

## 1.0 Background

1.1 Broomfield Park Medical Centre, Dr Durr and Partners, uses closed circuit television (CCTV) images to monitor the building for the prevention, identification and reduction of crime; in order to provide a safe and secure environment for staff patients and visitors, and to prevent the loss or damage to the surgeries property.

1.2 CCTV surveillance at the surgery is intended for the purposes of:

- protecting the surgeries building and assets, both during and after opening hours;
- promoting the health and safety of staff, patients and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders

1.3 The system comprises of 14 fixed cameras.

1.4 The CCTV system is owned and operated by the surgery and the deployment of which is determined by the surgeries leadership team (4 Partners and Practice Manager).

1.5 The CCTV is monitored on an internet based system by the practice manager Nathan Moore, with login details provided to Dr Monica Green (GP Partner and lead for the building and maintenance) and Deborah Edwards (Quality Manager and next senior administration staff).

1.6 The internet based site is; 164.39.227.95:8001

1.7 The surgeries CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the surgeries use of CCTV and how it complies with the Act.

1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.9 The surgery complies with Information Commissioner's Office (ICO) CCTV Code of Practice (Appendix 1) to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.10 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

1.11 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the surgery, including codes of Practice for dealing with Complaints, Bullying & Harassment and Sexual Harassment and other relevant policies

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## 2.0 Justification for Use of CCTV

2.1 The use of CCTV to control the perimeter of the surgery building for security purposes, has been deemed to be justified by the leadership team due to the million pound extension completed in March 2019. The system is intended to capture images of intruders, of individuals damaging property, of individuals removing goods without authorisation or of antisocial behaviour.

2.2 CCTV systems will not be used to monitor normal staffs work or activity within or outside the surgery.

## 3.0 Data Protection Impact Assessments

3.1 The surgery did not have CCTV cameras before this installation.

3.2 Where new CCTV systems or cameras are to be installed, the surgery has carried out a full Data Protection Impact Assessment (Appendix 2) identifying risk related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, patients and local residents.

3.3 If cameras are moved or upgraded, a new Data Protection Impact Assessment will be completed.

3.4 The Data Protection Impact Assessment will be reviewed and updated every 3 years.

## 4.0 Location of Cameras

4.1 The exact locations of the cameras are;

Camera 1: Car Park Entrance

Camera 2: Pedestrian Gates

Camera 3: Side Passage, Broomfield Place

Camera 4: Staff Entrance

Camera 5: Main Patient Entrance

Camera 6: Main Reception Desk

Camera 7: Ground Floor Waiting Area

Camera 8: Ground Floor Rear Waiting Area (Outside Clinic Rooms 16, 17 & 18)

Camera 9: Ground Floor Corridor to Room 15

Camera 10: Ground Floor Corridor to Fire Exit

Camera 11: Ground Floor Stair Well (Bottom)

Camera 12: First Floor Stair Well (Top)

Camera 13: First Floor Waiting Area

Camera 14: First Floor Corridor, Back End by Disabled Toilet

4.2 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated for employees, patients, visitors and local residents.

4.3 The leadership team of the surgery ensured that the location of equipment was carefully considered to ensure that images captured comply with the Data Protection Act. The surgery has made every effort to position cameras so that their coverage is restricted to the surgeries premises, which may include outdoor areas.

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4.4 Certain areas have been “blacked out” on the camera screens to ensure data protection and privacy is maintained. These include;

- The main Spon End Road; At the front of the surgery - A residents upstairs rear window
- The ground floor reception computer screens

4.5 *Internal Cameras:* The surgery has selected locations for the installation of CCTV which are least intrusive to protect the privacy of individuals, capturing “foot fall” of individuals moving around the building to ensure a reasonable expectation of privacy.

4.6 *External Cameras:* The surgery has selected the positioning and locations for the installation of CCTV in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.7 CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of surgeries buildings and property: The building's perimeter, the car park, entrances and exits (including fire exits), reception areas, corridors and stair wells.
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
- Criminal Investigations (carried out by police): Robbery, burglary and theft surveillance

## 5.0 Covert Surveillance

5.1 Broomfield Park Medical Centre will not engage in covert surveillance.

## 6.0 Notification

6.1 A copy of this CCTV Policy will be provided on request to staff, patients and visitors to the surgery and will be made available on the surgery website.

6.2 The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

6.3 Adequate signage will also be prominently displayed at the entrance to surgeries property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location. Appropriate locations for signage will include:

- Main car park gates
- Rear pedestrian gates
- At the entrance to the premises
- Reception area
- Waiting areas
- All main corridors

## 7.0 Storage and Retention

7.1 Images are recorded online, on a secure account for Broomfield Park Medical Centre.

7.2 The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

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7.3 The images/recordings will be stored in a secure environment with a log of access kept maintained by practice manager (CCTV System Log Book).

7.4 Access will be restricted to authorised personnel indicated in section 1.5; supervising the access and maintenance of the CCTV System is the responsibility of the practice manager. The practice manager may delegate the administration of the CCTV System to another staff member.

7.5 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7.6 If images are downloaded for the purpose of an investigation/prosecution, Files/Tapes/DVDs will be stored in a secure environment with a log of access kept (CCTV System Log Book). Access will be restricted to authorised personnel.

## 8.0 ACCESS

8.1 Recorded footage and the monitoring are securely stored online. Unauthorised access and login to the account will not be permitted at any time. A log of access to footage will be maintained (CCTV System Log Book).

8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only.

8.3 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept. (CCTV System Log Book)

8.4 A record of the date of any disclosure request along with details of whom the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible, the data subject will be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- By the police where Broomfield Park Medical Centre are required by law to make a report regarding the commission of a suspected crime
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Broomfield Park Medical Centre's property
- To the HSE and/or any other statutory body charged with child safeguarding
- To assist the practice manager in establishing facts in cases of unacceptable employee behaviour
- To data subjects (or their legal representatives), pursuant to a Subject Access Request (SARS)
- To individuals (or their legal representatives) subject to a court order
- To the surgeries insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property

## 9.0 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to them under the Data Protection Act.

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9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. E.g. Date, time and location.

9.3 The practice manager will respond to requests within 30 calendar days of receiving the request in line with the surgeries right of access policy.

9.4 The surgery reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

9.5 A record of the date of the disclosure along with details of whom the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, the surgery provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to 3rd parties, the surgery will take appropriate steps to mask and protect the identities of those individuals.

## 10.0 Complaints

10.1 Complaints and enquiries about the operation of CCTV within the surgeries ground and internal building should be directed to the practice manager in the first instance.

## 11.0 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

## 12.0 Responsibilities

12.1 The practice manager will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Broomfield Park Medical Centre
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Broomfield Park Medical Centre
- Ensure that the CCTV monitoring at Broomfield Park Medical Centre is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (CCTV System Log Book) and release of any material recorded or stored in the system
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally

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- Give consideration to both staff and patient feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the surgery and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that login details for the website of stored monitoring footage are kept safe and secure
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

**END OF POLICY**