

# CCTV (Surveillance) Policy

Date	Version	Stage	Author
January 2015	1.0	Policy Created	Alison Murdoch
December 2015	2.0	ICO Checklist for CCTV users added	J Darlington/Alison Murdoch
March 2016	2.0	Review with no amendments	Alison Murdoch
February 2017	3.0	Amendments made to reflect storage dates	Alison Murdoch
June 2019	3.0	No updates	Alison Murdoch
May 2021	4.0	Requests paragraph added and retention time amended	Paul Haycox

## Definitions

Surveillance is the monitoring of a place, person, group, or ongoing activity in order to gather information.

Overt surveillance is where the individual being monitored would reasonably be aware of the surveillance occurring. For example, visible CCTV cameras with clear signs saying that they are in use.

Covert surveillance is where the individual being monitored would not reasonably be aware of the surveillance occurring. For example, the use of hidden audio recording devices for a time-limited and specific purpose.

## Background

St Michael's Clinic installed Overt CCTV, predominantly to the external areas of the building and car park in 2015/2016 following an incident of theft and loitering including drug abuse, outside of the building at night. Cameras are also installed in the reception area and waiting room areas internally. There are no hidden cameras within the building and no cameras in any clinical areas.

## Requests for footage

It is forbidden for CCTV operators to share footage of identifiable people with the media or on the internet for entertainment purposes. The only footage that is allowed to be released is if it's to identify someone for purposes requested by the police.

Once CCTV has been requested from the police, the operator must abide by the Data Protection Act to ensure that this footage is safe and secure and not handed to any other entity.

## The Policy

Clear notices are displayed for the public and staff to see. There is no facility for audio recording.

The images are stored securely on the computer system in a secure part of the building. The CCTV system is password protected. Images can be viewed on request by members of the

public or staff for a period of up to thirty (30) days at which point they are over-written. These images are kept purely for the detection of criminal activity or in or around the clinic building, particularly at night and for the protection of staff. Three months was felt sufficient to be aware of any incident that had taken place, only trained staff have access to the CCTV system.

These images are not used to monitor staff work patterns or behaviour. Images are not viewed unless an incident has occurred and are overwritten by new images after a period of three months. No third party is involved, and images are not stored externally.

The Information Commission was informed in writing when the CCTV was installed in the clinic.