

CCTV POLICY

This policy applies to CCTV and other surveillance camera devices that view or record individuals, and covers other information that relates to individuals, for example vehicle registration marks.

PURPOSE

CCTV surveillance is used to monitor and collect visual images for the purposes of:

1. To help deter and detect crime and provide evidential material for court proceedings.
2. Assist with the potential investigation and identification of offenders.
3. To assist in supporting civil proceedings.
4. To assist in discharging its health and safety obligations towards staff
5. To investigate allegations of staff misconduct
6. Protect the Practice buildings and property

All staff involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

POLICY

Edgewood Veterinary Group will operate its CCTV systems in a manner that is consistent with respect for the individual's privacy.

1. Edgewood complies with the Information Commissioner's Office (ICO) CCTV Code of Practice and the Surveillance Camera Commissioner's Surveillance Code of Practice to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
2. The CCTV systems will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
3. The use of the CCTV systems 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.
4. Cameras will be sited so they only capture images relevant to the purposes for which they are installed.

LOCATION AND SIGNAGE

Cameras are sited to ensure that they cover the relevant areas as far as is possible. Cameras are installed within buildings and externally in public facing areas.

The images captured by the cameras are recorded continuously. The images can be viewed when there has been a specific event.

The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. The cameras are so positioned so that their coverage is restricted to the relevant area.

Signs are placed wherever CCTV systems are in operation, in order to inform individuals that CCTV is in operation.



MONITORING AND RECORDING

1. Cameras are monitored in a secure private environments.
2. System administrators can view and access footage for the purposes for which the CCTV system is in operation.
3. Images are recorded on secure servers (ideally standalone systems, not connected to the network) and are viewable by the system administrators.
4. Staff who have access to the system will receive continued training as needed, to ensure their competence relating to relevant operational, technical, privacy considerations, policies and procedures.
5. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.
6. Viewing monitors are password protected and switched off / lock when not in use to prevent unauthorised use or viewing.
7. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose, and that the date and time stamp recorded on the images is accurate.

SUBJECT ACCESS REQUESTS

Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Manager or Director at Edgewood Veterinary Group.

In order to locate the images on the system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

There will be no disclosure of recorded data to third parties other than the authorised organisations such as the Police and others given permission by the Principal or Data Protection Officer for a specific purpose.

Where Edgewood Veterinary Group is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

THIRD PARTY DISCLOSURES

In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

Such disclosures will be made at the discretion of the system administrator, with reference to relevant legislation.

A log of any disclosure made under this policy will be held by the relevant system administrator. The log should include (at a minimum) the date that a disclosure was made, the recipient, and the reason for disclosure.

Before disclosing any footage, consideration should be given to whether (if possible) images of third parties should be obscured to prevent unnecessary disclosure.

RETENTION

Unless required for evidentiary purposes, the investigation of an offence, or as required by law, CCTV images will be retained for until storage limitations require that footage needs to be overwritten. Images will be automatically overwritten.

Any footage downloaded and retained for evidential purposes must be reviewed after three months by the system administrator, and either a destruction date or review date must be set, with written justification for further retention recorded.

CCTV disclosure logs should be kept for 6 years.