

CCTV and Telephone Recording Policy

Our surgery uses CCTV images to provide a safe and secure environment for staff and visitors to our premises and to protect our property. CCTV systems installed at the practice record images only and do not record audio. We also use Merlin communications audio recording on our telephones.

This policy sets out the use and management of the CCTV equipment, recorded images and telephone call recordings in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Purposes of CCTV and Telephone Recording

The purposes of the practice installing and using CCTV and audio recording software on our telephones include:

To ensure the safety of clients, pets and staff

To ensure that health and safety rules and procedures are being complied with

To assist with the identification of unauthorised actions or unsafe working that may result in disciplinary proceedings and to provide relevant evidence demonstrating whether staff protocols, policies and procedures have been followed.

CCTV footage and audio recordings may be used as evidence in investigations and in relation to disciplinary procedures.

To monitor the security of the business premises

Location of cameras

Cameras are located only in reception (waiting area) in our main hospital in Ruislip and our Greenford practice (waiting area). Arden House has positioned the cameras so that they only cover the waiting area on the business premises and they have been sited so that they provide clear images. No camera focuses, or will focus on toilets.

All cameras are clearly visible.

Signs are displayed so that staff and visitors are aware they are entering an area covered by CCTV.

Recording of audio and images

CCTV images are recorded 24 hours a day throughout the year. CCTV cameras do not record audio.

Telephone calls made through the practice telephone system are recorded and retained for a period of 30 days.

As the recording system records digital images, any CCTV images are not held for more than 30 days. However, where a law enforcement agency is investigating a crime,

images may need to be retained for a longer period.

Access to and disclosure of audio and images

Access to and disclosure of images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

Access to recorded images is restricted to only those managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

The police, where the images recorded could assist in the prevention or detection of a crime or the identification of an offender or the identification of a victim or witness.

Prosecution agencies.

Relevant legal representatives.

Managers who are involved in the management and admin of disciplinary procedures.

Individuals whose images have been recorded.

The owner of the practice is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will still be recorded.

Individuals' access rights

You have the right on request to receive a copy of the personal data that the practice holds about you, including telephone recordings and CCTV images if you are recognisable from the image.

If you wish to access any telephone recording or CCTV images relating to you - you must make a written request to the practice using the contact details provided at the bottom of this policy. Your request should include enough information to help us locate the recording, such as the date and approximate time of the telephone call or CCTV footage, along with any other relevant details. We may also need to verify your identity before providing access to any personal data.

We will respond promptly and in any case within one calendar month of receiving your request.

We will first determine whether disclosure of your images will reveal a third party as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be blurred as otherwise it would involve an unfair intrusion into their privacy.

Where it is not technically possible to blur third party images we will consider whether an alternative method of providing access can be used, such as providing still images, redacted footage or a description of the relevant footage. If no suitable method is available that protects the privacy rights of third parties, we may be unable to disclose the footage.

If we are unable to comply with your request because providing access could prejudice the prevention or detection of crime we will inform you of this where we are legally permitted to do so.

Staff training

We will ensure that all employees who handle CCTV images or telephone recordings are appropriately trained in the relevant systems, as well as their responsibilities under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Contact

Any complaints or enquiries about the operation of our CCTV system should be emailed to the surgery at ardenhousevet@gmail.com. If you have any questions, comments and requests regarding this policy please also contact us at ardenhousevet@gmail.com