



HOOK LANE
DENTAL CARE

CCTV policy

We are aware that CCTV surveillance is intrusive, and it is used by the practice, as it has been deemed likely to address or prevent a known problem. We can justify its use and have considered less intrusive options such as staff monitoring and additional locks to address the problem. This policy describes how we comply with data protection legislation requirements in our use of CCTV.

Ownership and operation of CCTV

Modular IT solution has overall responsibility for CCTV at the practice and the images produced.

Modular IT solutions are responsible for installing and maintaining the CCTV equipment and storing the images produced. It processes information on behalf of Hook Lane Dental Practice who is ultimately responsible for the information obtained from CCTV use at the practice.

The CCTV is operational 24/7 and we have a written data processing agreement with our CCTV company

Purpose and location of CCTV

We use CCTV recording to:

- Protect the practice premises and property
- Increase the safety of practice patients, staff and visitors
- Deter both criminal activity and anti-social behaviour
- Assist in the apprehension, identification and prosecution of offenders in the event of an incident
- Provide evidence to a court or tribunal

CCTV cameras at the practice cover the following areas:

Driveway - outside

Entranceway – outside

Entranceway - inside

Patient waiting area x 1 – inside

Reception area x 1 – inside

Stairwell to first floor – inside

Hallway on first floor - inside

Walkway to compressor room – outside

Garden area behind practice – outside

Decontamination room – inside

The CCTV does not have audio recording capability. If the need for audio recording capability is highlighted the current system cannot be upgraded so the practice would strongly consider its needs before installing audio recording CCTV.

The CCTV monitors (screens) are installed on the comms room PC, on both reception PC's, the office PC and the principal PC located in surgery (5). They are also accessible via the principals and managers mobile devices which are encrypted.

Use of CCTV recordings

CCTV images and recordings are personal information and, when using or processing the information, we will respect the legal rights of the individuals shown in the recordings.

We will not share images or recordings except in the following circumstances:

- If requested by the local authority, police or courts for the investigation, prevention or prosecution of anti-social behaviour or criminal activity
- For bringing or defending a legal claim
- To comply with a police warrant or an order given by a court or tribunal.

Access to the CCTV monitors and/or recorded images, for the purposes listed above, is restricted to Kieron Khoorbhoor, Lisa Jackson, Jade Harris, Jo-Anne Morri, Lois Withey, Taylor Waddell and Natacha Elliott. Other staff may be granted access in exceptional circumstances and only with clear justification.

The CCTV equipment will be checked regularly to ensure that it is in good working order by a third party and images recorded are of a enough quality to be used for the purposes listed above. CCTV images and recordings will be kept for 2 weeks unless they are being used in the investigation of an incident (for example theft, damage or violence). After this time or following the conclusion of an investigation, the recordings will be destroyed and/or irretrievably deleted.

Requests for CCTV recordings

Requests by individuals for recordings of themselves will be processed in line with the practice policy on access to information.

Requests by third parties (such as law enforcement agencies or lawyers) for practice CCTV recordings should be submitted in writing to the registered manager. They may then instruct the practice manager to:

1. Verifies the identity of the person / organisation and takes a copy of any identification documents, if required.
2. Decides whether providing the CCTV recording would satisfy one or more of the purposes listed in this policy.
3. Considers the rights of the individuals shown in the CCTV and balance the protection of these rights against the reasons for the request. Some images may require editing to protect the privacy of individuals.
4. If appropriate, transfers the requested CCTV recordings / images securely to the third party.
5. Keeps a record of the disclosures of CCTV to the third party.

If unsure about providing the requested information to a third party, the registered manager should seek advice from the BDA or the Information Commissioner's Office (ICO).

Review

This policy will be reviewed every 2 years if no business operation changes occur as stated in the attached checklist.

Complaints

Any concerns or complaints about this policy should be raised with the practice principle Dr Kieron Khoorbhoor. If the concerns cannot be resolved, the practice may seek advice from the ICO.

Updated: 06.02.2025

To review: Feb 2027