



POLICY/PROCEDURE INFORMATION (Policy no OP009)	
Subject	CCTV Policy and Procedure <i>(This policy is non-contractual and is subject to periodic review and will be amended according to service development needs).</i>
Applicable to	All staff and volunteers of Nottinghamshire Hospice
Target Audience	Others such as agents, consultants, and other representatives of Nottinghamshire Hospice may be required to comply with the policy as a condition of appointment.
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Lead responsible for Policy	Chief Executive Officer
Policy reviewed by	Chief Executive Officer
Notified to (when)	Strategy and Corporate Governance sub-Group July 2020
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CQC Standard if applicable	
Links to other Nottinghamshire Hospice Policies	General Data Protection Regulations 2018/Data Protection Policy.
Links to external policies	General Data Protection Regulations 2018
Summary	The policy outlines the purpose of CCTV as used by Nottinghamshire Hospice
This policy replaces	N/A

VERSION CONTROL		
Status	Date	Reviewed date
Original policy written by Rowena Naylor-Morrell	6/7/20	
Policy reviewed by Maria Holmes, Director of Finance and Resources		
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Updated control sheet and published on Website	24 July 2020	
Sherwood retail location added by Kate Rogers, Governance and Operations Manager. Updated on website	July 2021	

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Background

1.0 Nottinghamshire Hospice has in place a system of closed-circuit television (CCTV) images across two sites of operation, Nottinghamshire Hospice premises at 384, Woodborough Road, Nottingham NG3 4JF, Sherwood Nottinghamshire Hospice shop, 583 Mansfield Road, Sherwood, Nottingham NG5 2JN and Nottinghamshire Hospice Retail Support Centre at Denham Street, Nottingham NG7 4TD. They are in place for the prevention, identification and reduction of crime and monitor the Nottinghamshire Hospice buildings in order to provide a safe and secure environment for volunteers, patients, staff and visitors, and to prevent the loss or damage to Nottinghamshire Hospice property.

Purpose of CCTV

1.1 CCTV surveillance at the Nottinghamshire Hospice is intended for the purposes of:

- protecting the Nottinghamshire Hospice buildings and Nottinghamshire Hospice assets, both during and after Nottinghamshire Hospice hours.
- promoting the health and safety of staff, patients, volunteers, and visitors.
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- supporting the Police in a bid to deter and detect crime.
- to assist in the effective resolution of disputes which arise during disciplinary or grievance proceedings
- assisting in identifying, apprehending, and prosecuting offenders; and ensuring that the Nottinghamshire Hospice rules are respected so that the Nottinghamshire Hospice can be properly managed.

The CCTV System

1.2 The system comprises of 15 fixed cameras.

1.3 The CCTV system is owned and operated by the Nottinghamshire Hospice and the deployment of which is determined by the Director of Finance and Resources.

1.4 The CCTV is not routinely monitored, authorisation for viewing or monitoring CCTV must be obtained from the Chief Executive Officer.

1.5 The Nottinghamshire Hospice's CCTV Scheme is registered with the Information Commissioner. This policy outlines the Nottinghamshire Hospice's use of CCTV and how it complies with the Act.

Authorised Personnel

1.0 All authorised employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. This is limited to the Chief Executive Officer, Director of Finance and Resources and the Human Resources Manager in relation to Nottinghamshire Hospice 384 Woodborough Road premises. In

relation to the Retail Support Centre this is limited to the Chief Executive Officer, Director of Finance and Resources, Human Resources Manager, and the Area Retail Manager. On occasions, it may be designated that a further employee is present to provide technical support or further information. In relation to the Sherwood Shop this is limited to the Chief Executive Officer, Director of Finance and Resources, Human Resources Manager, and the Area Retail Manager. On occasions, it may be designated that a further employee is present to provide technical support or further information.

1.1 All authorised employees 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.

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

1.3 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 routinely monitoring employee performance or behaviours.

1.4 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Nottinghamshire Hospice, including Dignity at Work Policy, Codes of Practice, and other relevant policies, including the provisions set down in equality and other educational and related legislation.

2.0 Justification for Use of CCTV

The use of CCTV to control the perimeter of the Nottinghamshire Hospice buildings for security purposes has been deemed to be justified by the Director of Finance and Resources together with the Board of Trustees. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti-social behaviour in addition assisting in identifying, apprehending, and prosecuting offenders; and ensuring that the Nottinghamshire Hospice rules are respected so that the Nottinghamshire Hospice can be properly managed.

2.1 CCTV systems will not be used to monitor usual or routine patient or employee activity within Nottinghamshire Hospice 384 Woodborough Road Nottingham or Nottinghamshire Hospice Retail Support Centre Denham Street Nottingham.

2.2 Internal CCTV cameras where present will be used to capture images of intruders or of individuals damaging property or removing goods without authorisation, in addition assisting in identifying, apprehending and prosecuting offenders; and ensuring that the Nottinghamshire Hospice rules are respected, this includes the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings so that the Nottinghamshire Hospice can be properly managed.

3.0 Data Protection Impact Assessments

3.1 Where new CCTV systems or cameras are to be installed, the Nottinghamshire

Hospice will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff, patients, volunteers, and residents.

3.2 Where existing CCTV systems are in operation as of May 2018, the Nottinghamshire Hospice will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3 year period from the date of the implementation of GDPR, whichever is sooner.

4.0 Location of Cameras

4.1 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.

4.2 The Nottinghamshire Hospice will ensure that the location of equipment is carefully considered to ensure that images captured comply with data protection legislation. The Nottinghamshire Hospice will make every effort to position cameras so that their coverage is restricted to the Nottinghamshire Hospice premises, which may include outdoor areas.

4.3 CCTV will not be used in patient areas.

4.4 The use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Nottinghamshire Hospice has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.5 Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

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

- **Protection of Nottinghamshire Hospice buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- **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 Nottinghamshire Hospice 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, volunteers, and visitors to the Nottinghamshire Hospice and will be made available on the Nottinghamshire Hospice 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 Nottinghamshire Hospice property. Signage shall include the name and contact details of the Director of Finance and Resources as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Appropriate locations for signage will include:

- at entrances to premises i.e., external doors, Nottinghamshire Hospice car park
- reception areas
- at or close to each internal camera

7.0 Storage and Retention

7.1 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.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Chief Executive Officer. The Chief Executive Officer may delegate the administration of the CCTV System to another staff member.

7.4 In certain circumstances, the recordings may also be viewed by other individuals 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.

7.5 Files/Tapes/DVDs will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

8.0 ACCESS

8.1 Recorded footage and the monitoring equipment will be securely stored. Unauthorised access to that area will not be permitted at any time. A log of access to footage will be maintained.

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.

8.4 A record of the date of any disclosure request along with details of who 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 a 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 Nottinghamshire Hospice (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- 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 Nottinghamshire Hospice property, or
- To the HSE and/or any other statutory body charged with vulnerable adult or child safeguarding; or
- To assist the Chief Executive, Director of Finance and Resources, Human Resources Manager, or a named and designated person in establishing facts in cases of unacceptable behaviour, breaches of the Nottinghamshire Hospice Code of Conduct or other related behaviour which breaches a specified policy or procedure, on occasions this may involve notifying the Police or relevant authority, or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the Nottinghamshire Hospice insurance company where the insurance company requires same 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 themselves under the General Data Protection Regulations Act 2018 or any future relevant data protection legislation.

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

9.3 The Nottinghamshire Hospice will respond to requests within 30 calendar days of receiving the request in line with the Nottinghamshire Hospice's right of access policy.

9.4 The Nottinghamshire Hospice 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 who 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 Nottinghamshire Hospice 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 it is not possible due to technology or logistical procedures not possible to provide a copy of their data, applicants will be invited to attend a Nottinghamshire Hospice premises for supervised viewing of any data.

9.8 Where footage contains images relating to 3rd parties, the Nottinghamshire Hospice 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 Nottinghamshire Hospice should be directed to the Director of Finance and Resources 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 Chief Executive (or nominated person) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Nottinghamshire Hospice
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within Nottinghamshire Hospice
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at Nottinghamshire Hospice 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 (e.g. an access log) to or the release of tapes or 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
- Give consideration to all complaints regarding the 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 Nottinghamshire Hospice and be mindful that no such infringement is likely to take place
- Co-operate with the Director of Finance and Resources at Nottinghamshire Hospice in reporting on the CCTV system in operation in the Nottinghamshire Hospice
- 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 monitoring footage is stored in a secure place with access by authorised personnel only
- 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; protecting the Nottinghamshire Hospice buildings and Nottinghamshire Hospice assets, both during and after Nottinghamshire Hospice hours; promoting the health and safety of staff, patients, volunteers, and visitors; preventing, reducing the incidence of crime and anti-social behaviour (including theft and vandalism); to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings; supporting the Police in a bid to deter and detect crime; assisting in identifying, apprehending and prosecuting offenders; and ensuring that the Nottinghamshire Hospice rules are respected so that the Nottinghamshire Hospice can be properly managed, and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

