



POLICY INFORMATION (Policy no OP009)	
Subject	CCTV Policy and Procedures <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.
Date issued	26 September 2023
Next review date	26 September 2026
Lead responsible for Policy	Chief Executive Officer
Policy reviewed by	Facilities and Transport Manager and Risk Evolves
Notified to (when)	Quality and Safety sub-Group 26 September 2023
Authorised by (when)	Quality and Safety sub-Group 26 September 2023
CQC Standard if applicable	
Links to other Hospice Policies	Data Protection Policy
Links to external policies	Data Protection Act 2018 (legislation.gov.uk) Biometrics & Surveillance Camera Commissioner/UK Govt - The Surveillance Camera Code of Practice https://www.gov.uk/government/consultations/surveillance-camera-code-of-practice
Summary	The policy outlines the purpose of CCTV as used by Nottinghamshire Hospice
This policy replaces	CCTV Policy and Procedures OP009 2020-2023

IMPORTANT NOTICE

Staff should refer to the Hospice website or Policies and Procedures folder on the 'N' drive for the most up to date Policy. If the review date of this document has expired it is still valid for 3 months. After that staff should seek advice from their clinical lead or manager.

VERSION CONTROL		
Status	Date	Review date
Original policy written by Rowena Naylor-Morrell	6/7/20	
Policy reviewed by Maria Holmes, Director of Finance and Resources		
Policy notified to Strategy and Corporate Governance sub-Group	7/7/20	
Policy ratified by Strategy and Corporate Governance sub-Group	7/7/20	7/7/20
Policy reviewed by Facilities and Transport Manager	Aug 2023	
Sherwood retail location added by Kate Rogers, Governance and Operations Manager. Updated on website	July 2021	
Policy notified to Quality and Safety Committee	26 Sept 2023	
Policy ratified by Quality and Safety Committee	26 Sept 2023	26 Sept 2026
Updated control sheet and published on website	24 Jul 2020	Oct 2023

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1.	Introduction Nottinghamshire Hospice has in place a system of closed circuit television (CCTV) images across numerous 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 periodically at other sites. 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.
2.	Purpose CCTV surveillance at the Nottinghamshire Hospice is intended for the purposes of: <ul style="list-style-type: none">• 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 Hospice can be effectively managed.

3. Responsibilities

The Chief Executive Officer (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 the Hospice
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring 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 Hospice and be mindful that no such infringement is likely to take place
- Co-operate with the Director of Finance and Resources in reporting on the CCTV system in operation in the Nottinghamshire Hospice
- Ensure that external cameras are non-intrusive in terms of their positions

	<p>and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”</p> <ul style="list-style-type: none"> • Ensure that monitoring footage is stored in a secure place with access by authorised personnel only • Ensure that images recorded on USB or digital images held on file are stored for a period not longer than 31 days, after which point they are to be erased or destroyed, unless they form part of evidence for a criminal investigation or court proceedings or internal investigation. • 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; protect the Nottinghamshire Hospice buildings and Hospice assets, both during and after 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 Hospice rules are respected so that the 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
<p>4.</p>	<p>The CCTV System</p> <p>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.</p> <p>The CCTV is not routinely monitored, authorisation for viewing or monitoring CCTV must be obtained from the Chief Executive Officer.</p> <p>The Hospice’s CCTV Scheme is registered with the Information Commissioner.</p>

	<p>This policy outlines the Nottinghamshire Hospice’s use of CCTV and how it complies with the Data Protection Act 2018.</p>
<p>5.</p>	<p>Authorised Personnel</p> <p>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 Director of People Services in relation to Nottinghamshire Hospice 384 Woodborough Road premises.</p> <p>On occasions, it may be designated that a further employee is present to provide technical support or further information. In relation to the shops, this is limited to the Chief Executive Officer, Director of Finance and Resources, Director of People Services, Director of Income Generation and other positions that may be deemed appropriate on a case by case basis. On occasions it may be designated that a further employee is present to provide technical support or further information.</p> <p>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.</p> <p>The Nottinghamshire Hospice complies with the UK’s The Surveillance Camera Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.</p> <p>The use of the CCTV system will be conducted in a professional, ethical, and legal manner.</p> <p>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 Bullying and Harassment Policy HR022, Code of Conduct HR031, and other relevant policies, including the provisions set down in equality and other educational and related legislation.</p>
<p>6.</p>	<p>Justification for Use of CCTV</p> <p>The use of CCTV to control the perimeter of the Nottinghamshire Hospice</p>

buildings for security purposes has been deemed to be justified by the CEO and Director of Finance and Resources. 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.

CCTV systems will not be used to systematically monitor usual or routine patient or employee activity within Nottinghamshire Hospice 384 Woodborough Road, it's use is limited to the purposes documented in this policy.

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.

Our Shops

When you visit or work in one of our shops, your image may be recorded on CCTV. To protect our customers, tenants, premises, assets, employees, and volunteers from crime, we may operate CCTV systems in our shops, which record images for security.

In our shops, we use CCTV to prevent fraudulent activity. We will use CCTV recording where it is required as evidence for internal investigations; for the prevention and detection of crime and for other requirements, if permitted by local law. We do this on the basis of our legitimate interest. Our aim is to protect the individuals we interact with from the effects of criminal activities, particularly fraud.

If we discover any criminal activity or alleged criminal activity through our use of CCTV, we will process this data for the purposes of preventing or detecting unlawful acts.

	<p>We hold CCTV images for up to 31 days (unless there is a specific evidential or operational reason for retaining these for a longer period from the date of recording). Signage will be displayed where this takes place.</p> <p>We will only engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) in highly exceptional circumstances. This includes but is not limited to instances where there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no alternative less intrusive way to tackle the issue.</p> <p>If covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the CEO. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert monitoring means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision.</p> <p>Any covert monitoring that does take place will be carried out only by those authorised to do so. Covert monitoring will only be carried out for a limited and reasonable period of time, consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.</p> <p>We will ensure that live feeds from cameras and recorded images are only viewed by approved employees whose role requires them to have access to such Data and any legal or compliance partners as required. This may include HR employees and employees responsible for making decisions in connection with the use of covert CCTV images and Data. Recorded images will only be viewed in a secure and restricted manner.</p> <p>Prior to introducing any new surveillance system, including placing a new CCTV any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better alternative solution exists.</p>
<p>7.</p>	<p>Data Protection Impact Assessments</p> <p>Where new CCTV systems or cameras are to be installed, the Nottinghamshire</p>

	<p>Hospice will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.</p> <p>Where existing CCTV systems are in operation as of May 2023, 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.</p>
<p>8.</p>	<p>Location of Cameras</p> <p>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.</p> <p>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.</p> <p>CCTV will not be used in patient areas.</p> <p>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.</p> <p>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.</p> <p>CCTV Video Monitoring and Recording of Public Areas may include the following:</p> <ul style="list-style-type: none"> • <i>Protection of Nottinghamshire Hospice buildings and property:</i> The building's perimeter, entrances and exits, lobbies and corridors, special

	<p>storage areas, office locations, receiving areas for goods/services</p> <ul style="list-style-type: none"> • 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
<p>9.</p>	<p>Notification</p> <p>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.</p> <p>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.</p> <p>Adequate signage will also be prominently displayed at the entrance to Nottinghamshire Hospice property.</p> <p>Appropriate locations for signage will include:</p> <ul style="list-style-type: none"> • at entrances to premises i.e., external doors, Nottinghamshire Hospice car park • reception areas • at or close to each internal camera
<p>10.</p>	<p>Storage and Retention</p> <p>The images captured by the CCTV system is retained on the hard drive for up to 31 days dependent on the data storage capacity. Where any images are used to identify an issue they will only be retained specifically in the context of an investigation/prosecution after they are extracted from the system.</p>

	<p>These images/recordings will be stored on a USB drive in a secure environment with a log of access kept.</p> <p>Access will be restricted to authorised personnel:</p> <ul style="list-style-type: none"> • CEO – Authorisation and supervision of access and extraction of images from the CCTV System • Director of Finance and Resources – Authorised access and maintenance of the CCTV System. • Facilities and Transport Manager – Maintenance of the CCTV System and supervised operation of the system only. <p>In certain circumstances, other individuals may also view the recordings 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.</p> <p>USBs will be stored in a secure environment with a log of access maintained. Access will be restricted to authorised personnel. Similar measures will be employed when using printed digital images, with logs of access to the images created.</p>
<p>11.</p>	<p>Access</p> <p>Recorded footage 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.</p> <p>Access to the CCTV system is secured by the use of a password. Access can be made directly through the hard drive or via the CCTV App. The App and passwords are held only by the CEO, Director of Finance and Resources and the Facilities Manager.</p> <p>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.</p> <p>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</p>

	<p>they represent), why they required it and how the request was dealt with will be made and kept, in case of a challenge.</p> <p>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 unless an exemption applies under the Data Protection Act 2018.</p> <p>In relevant circumstances, CCTV footage may be accessed:</p> <ul style="list-style-type: none"> • 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, Director of People Services, 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.
<p>12.</p>	<p>Subject Access Requests (SAR)</p> <p>Individuals have the right to request access to CCTV footage relating to</p>

	<p>themselves under the General Data Protection Regulations Act 2018 or any future relevant data protection legislation.</p> <p>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.</p> <p>The Nottinghamshire Hospice will respond to requests within a calendar month of receiving the request in line with the Nottinghamshire Hospice’s right of access policy.</p> <p>The Nottinghamshire Hospice reserves the right to refuse access to CCTV footage where an exemption applies under the Data Protection 2018, where it would prejudice the legal rights of other individuals or jeopardises an on-going investigation.</p> <p>A record of the date of the disclosure along with details of whom the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.</p> <p>In giving a person a copy of their data, the Nottinghamshire Hospice may provide a still/series of still pictures, or via a secure format and method deemed appropriate. However, other images of other individuals may be obscured before the data is released.</p> <p>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.</p> <p>Where footage contains images relating to 3rd parties, the Nottinghamshire Hospice will take appropriate steps to mask and protect the identities of those individuals.</p>
<p>13.</p>	<p>Complaints</p> <p>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.</p>

<p>14.</p>	<p>Staff Training</p> <p>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.</p> <p>Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.</p> <p>Staff misuse of surveillance system information will lead to disciplinary proceedings.</p>
<p>15.</p>	<p>Equality Impact Assessment</p> <p>Equality Impact Assessment completed at Screening stage as no direct engagement with target audience.</p>

CCTV Monitoring log

Anyone looking at CCTV needs to have a second person with them and must complete this form.

Date	Time	Name	Name	Cause