

## CCTV policy

### 1. Introduction

- 1.1. This policy forms part of the data protection policy. Its purpose is to ensure we comply with legal requirements for CCTV use.

### 2. Legal background

- 2.1 Any surveillance cameras capture personal data, so the use of CCTV has data protection and privacy implications. We must comply with the Information Commissioner's Office **code of practice** on CCTV and data protection legislation.
- 2.2 The Surveillance Camera Code of Practice in the Protection of Freedoms Act 2012 contains 12 guiding principles, which are referenced in the ICO code.

### 3. Policy statement

- 3.1 We use CCTV at the GPhC to support the safety and security of our staff and premises. Under the GDPR condition for processing in article 6(1)(f), it will be used to:
  - act as a deterrent to intruders and to the theft or misuse of property or information
  - act as a deterrent to improper or aggressive behaviour
  - to provide evidence to support the investigation of safety- and security-related incidents
- 3.2 We will not use CCTV for other purposes and will not include audio recording.
- 3.3 CCTV cameras will be sited so that recordings meet the stated purposes. They will cover entrances to the premises and offices, the evidence room, secure storage area and IT rooms.
- 3.4 We will be transparent in our use of CCTV and we will make all who use the premises aware of its use through appropriate signs and information about our policy.
- 3.5 We will have procedures for operating and accessing CCTV recording equipment, which we will communicate to those staff, contractors and third parties who administer, access or operate the equipment or data.
- 3.6 CCTV recordings and data will be classified as confidential information and held in systems with appropriate security measures to safeguard against unauthorised access and use.
- 3.7 We will ensure that contractual arrangements with any contractors or third party suppliers who may maintain or administer CCTV systems on our behalf cover confidentiality and information security.
- 3.8 Users will only access and view CCTV recordings and data in response to a request authorised by the head of governance or a member of the Senior Leadership Group.
- 3.9 Access to CCTV systems, recordings and data for the purposes of maintenance or support will be restricted to users authorised by the head of IT and facilities.

- 3.10 Information will be stored in a way that allows relevant frames to be isolated to answer a request.
- 3.11 CCTV information will not be disclosed except as necessary for the stated purpose or to respond lawfully to a request under data protection legislation or Freedom of Information Act 2000.
- 3.12 Recordings and data will routinely be held for 3 months and then deleted.

### **CCTV policy**

Author: Carole Gorman

Version: 2

Approved by: Senior Leadership Group

Date: 15/05/2018

Last reviewed and approved by Senior Leadership Group

Date: 06/09/2016