
DOROTHY HOUSE

CCTV PRIVACY NOTICE

1. Introduction and Scope

Closed circuit television (CCTV) is installed in the Controlled Drugs Room (CDR) on the Inpatient Unit at Dorothy House, and images from the cameras are recorded. The principle purpose for installing the cameras is to aid incident investigation and support learning and development.

Only employees and volunteers that have access to the CDR are recorded. No audio is recorded.

Before installing the CCTV system we carried out a data privacy impact assessment (DPIA) and legitimate interest assessment to ensure we were balancing our need for CCTV with the impact on your privacy. We have explored alternative options but consider that this is the most effective and proportionate way to achieve our objectives.

This Privacy Notice should be read in conjunction with our Privacy Statements ([Privacy - Dorothy House](#)) which outline DH's approach to using your data generally.

The Responsible Officer for Data Protection at Dorothy House is the Senior Information Risk Owner/Deputy Chief Executive.

The use of CCTV falls within the scope of the Data Protection Act 2018 and the General Data Protection Regulation. This Privacy Notice also follows the recommendations issued by the Information Commissioner's Office *In the picture: A data protection code of practice for surveillance cameras and personal information*. <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

In order to comply with the requirements of the Data Protection Act 2018, data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and where necessary kept up to date
- Kept in form which permits identification of data subjects for no longer than is necessary for the purposes for which those data are processed, and
- Processed in a manner that ensures appropriate security of the personal data

2. CCTV Code of Practice

- The CCTV system is managed and maintained by Dorothy House.
- Dorothy House is the Data Controller and is registered with the Information Commissioner's Office no. Z7289749.
- We have installed CCTV to:

- a) provide a safe environment to protect and support staff if drugs should go missing/be unaccounted for
 - b) assist in accident incident investigation and provide clearer evidence
 - c) learn from incidents and develop our practices
 - d) prevent and detect crimes
 - e) ensure that our policies and procedures are being adhered to
 - f) monitor security
- Footage is reviewed principally for incident investigation, but may also be reviewed for learning and development purposes.
 - A privacy impact assessment will be undertaken for any new cameras that are installed and approved by the IGSG Committee.
 - Use of the CCTV system is audited regularly.
 - Where the CCTV system is in operation we will let you know by using signage explaining who to contact about the CCTV and where to find the relevant privacy notice.
 - Disclosure of information from CCTV will be provided to law enforcement personnel as required, for the prevention and detection of crime.
 - Any other requests for disclosure of information from CCTV footage will be considered at the discretion of the Senior Information Risk Officer (SIRO), considering the privacy of other data subjects, unless there is an overriding legal obligation, such as a court order or information access request.
 - CCTV monitoring can be legally used where we have made employees aware of this in writing and explained the reasons why. This will formally be incorporated into the staff handbook.
 - Dorothy House's legal basis for processing this information is "legitimate interest".

3. Data Recording, Storage, Retention and Disposal

CCTV images must only be used for the intended purposes as stated above. The method to secure recorded images will be auditable and audited regularly. This will include, logging of those people allowed access, the method of access and control of images taken from the system and the tracking any hard disk drives that have been removed from the site.

All images will be digitally recorded and stored securely, with data held on the system's hard drives. Automatic erasure/overwriting takes places in line with the system's storage capacity (16TB) and is subject to how much movement there is in the room that activates recording. More information can be found in our Asset Register and the system's technical specification. We will review the storage capacity after installation, and update this privacy notice with a specific time frame as soon as possible.

4. CCTV Subject Access Requests

Under the Data Protection Act 2018, you are entitled to make a "subject access request" regarding your personal data. This includes the right to see CCTV recordings.

You can request:

- What personal data is being processed
- What it is being used for
- Who it is being disclosed to or could potentially be disclosed to.

Our Subject Access Request (SAR) Procedure provides more specific detail on requesting CCTV images.

To request access to any personal data please contact info.governance@dorothyhouse-hospice.org.uk

If a third party is visible in the recording, their consent must be given before the recording can be disclosed under the SAR.

Please note that any request by a third party to view CCTV images must be approved by the SIRO, who will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties.

The SIRO will assess applications and decide whether the requested access will be permitted. Disclosure of recorded images to third parties will only be made in limited circumstances. For example, in cases of the prevention and detection of crime, disclosure to third parties will be limited to the following:

- Law enforcement agencies where the images recorded would assist in a specific criminal enquiry
- Prosecution agencies
- Relevant legal representatives
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings)

All requests for access or for disclosure should be recorded. If access or disclosure is denied, the reason should be documented as above.

5. Other Privacy Rights

The Data Protection Act 2018 also gives you other rights in relation to your personal data. Please see [Privacy - Dorothy House](#) for further detail. Please note however that some of these rights may not always apply as they have specific requirements and exemptions which may not apply to personal information recorded and stored in our CCTV system.

6. Accessing CCTV Images

Access to recorded images is restricted to:

- Pharmacist
- Senior Ward Sister
- Junior Ward Sister
- Controlled Drug Accountable Officer
- Deputy Controlled Drug Accountable Officer
- Quality Lead for DH
- Director of Patient and Family Services
- Head of Digital

- Head of Estates and Facilities (or deputy)
- IPU Service Manager
- Head of Governance
- Senior Information Risk Owner
- Caldicott Guardian
- Chief Executive

Viewing of images must be documented as follows:

- The name of the person accessing the recordings
- The date and time of access
- The name(s) of the person(s) viewing the images (including the names and organisations of any third parties)
- The reason for the viewing
- The outcome, if any, of the viewing

As access will be facilitated by the Estates and Facilities Team once appropriate authorisation has been granted, this document will be kept by that team, and updated as and when required.

7. Removal of Images for Use in Legal Proceedings

In cases where recordings are for use in legal proceedings, the following must be documented:

- The name of the person accessing the recordings
- The date and time of access
- The reason for access
- Specific authorisation for supplying a copy to a third party
- Any crime incident number to which the images may be relevant
- The place to which the recordings will be taken
- The signature of the collecting police officer, where appropriate

8. Concerns/Complaints

If you have concerns or a complaint about the CCTV system please email info.governance@dorothyhouse-hospice.org.uk outlining the reason for the concern/complaint. These will be dealt with in line with our Complaints Policy. If you are unable to resolve the issue with us personally, you can complain to the ICO:

<https://ico.org.uk/make-a-complaint/>

9. Supporting Policies/Procedures

- Complaints, Concerns and Compliments Policy
- Information Assets Register
- Information Governance Handbook

- Patient Safety Incidents Response Framework and Policy
- Privacy Statements
- Staff Handbook
- Subject Access Request Procedure

10. Reference Details

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