

CCTV POLICY

Poplar Grove Practice

Governance, privacy and operational arrangements for the use of CCTV

Document owner	Practice Manager	Approved by	Practice Partners
Version	1.0	Effective date	September 2026
Review date	September 2027	Review frequency	Annual / following significant change
Related lead	Data Protection / IG Lead	Status	Approved policy
Applies to	All staff, contractors and relevant third parties	Location	Practice premises and grounds covered by CCTV

1. Purpose

Poplar Grove Practice uses closed-circuit television (CCTV) only where there is a clear, documented and proportionate reason for doing so. The primary purposes are to support the safety and security of patients, visitors and staff; deter and investigate crime, violence, aggression, theft, criminal damage and other incidents; protect practice premises and assets; and assist the police or other authorised bodies where disclosure is lawful and appropriate.

CCTV is not intended to replace good security, staffing, clinical or safeguarding arrangements, and it must not be used simply because monitoring is convenient.

2. Scope

This policy applies to all CCTV cameras, recording equipment, monitors, storage media and associated systems operated on behalf of Poplar Grove Practice. It applies to all employees, GP partners, clinicians, temporary workers, contractors, volunteers and other people who may have access to CCTV equipment or recordings.

3. Legal and regulatory framework

The practice will operate CCTV in accordance with applicable legislation and guidance, including:

- UK General Data Protection Regulation (UK GDPR).
- Data Protection Act 2018.
- The Privacy and Electronic Communications Regulations 2003 where relevant.

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- Relevant employment, equality, health and safety, safeguarding and criminal law requirements.
- Information Commissioner's Office (ICO) guidance on video surveillance and CCTV.
- NHS information governance and confidentiality requirements applicable to primary care.

The legal and regulatory position can change. The Practice Manager / Information Governance Lead will review this policy and associated CCTV arrangements when relevant guidance or legislation changes.

4. Data protection principles

The practice will apply the data protection principles to CCTV footage. In particular, CCTV must be:

- Lawful, fair and transparent.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate where accuracy is relevant to the processing.
- Kept only for as long as necessary.
- Processed securely, with appropriate technical and organisational controls.
- Subject to accountability, with decisions and arrangements documented.

5. Lawful basis and necessity

The practice will document the lawful basis for CCTV processing. For routine security CCTV, the practice will normally consider legitimate interests under UK GDPR Article 6(1)(f), subject to a documented assessment that the processing is necessary and that the interests and rights of individuals do not override the practice's legitimate interests.

Where CCTV footage is used in circumstances involving special category data or criminal offence data, the practice will identify and document any additional condition and safeguards required.

Before installing new cameras, materially changing camera coverage, enabling audio, introducing analytics/facial recognition, or using CCTV for staff monitoring, the practice will assess necessity and proportionality and complete a Data Protection Impact Assessment (DPIA) where required.

6. CCTV coverage and camera positioning

Cameras will be positioned to capture only areas reasonably required for the stated purposes.

- Cameras should normally cover entrances, exits, reception/public areas, car parks, external approaches and other areas where there is a justified security need.
- Cameras must not be positioned in toilets, changing areas or other locations where people have a high and reasonable expectation of privacy.
- Clinical rooms, consultation rooms and other sensitive clinical areas must not be routinely recorded unless a separate, documented and exceptional justification has been approved.

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- The practice will use privacy masking, camera angle adjustment or other technical controls where necessary to minimise unnecessary capture of neighboring property, public areas or other irrelevant spaces.
- Audio recording must be disabled unless there is a specific and documented justification and appropriate assessment. Audio is generally more intrusive than video. **We do have one camera positioned at our front reception desk that will record audio sound.**

7. Patient, visitor and staff transparency

Individuals must be made aware that CCTV is in operation. Clear, visible signage will be displayed before or at the point where individuals enter areas covered by CCTV. Signage will state that CCTV is in operation, identify the organisation operating the system and provide a route for further information or contact.

The practice privacy notice will also explain the use of CCTV, its purposes, the relevant lawful basis, retention approach and individual rights.

8. CCTV ownership and responsibilities

Overall responsibility for CCTV governance rests with the Practice Manager, supported by the practice's Information Governance / Data Protection Lead.

- Practice Manager – overall operational and governance responsibility; ensures the system is appropriately managed, reviewed and resourced.
- Information Governance / Data Protection Lead – advises on UK GDPR, DPIAs, information rights, disclosure and data protection incidents.
- Authorised CCTV users – operate the system only for legitimate practice purposes and follow this policy.
- IT / CCTV contractor – maintains equipment and security controls under an appropriate contractual arrangement and confidentiality obligations.
- All staff – must not access, copy, photograph, download, disclose or share CCTV footage unless authorised.

9. Access to CCTV and security controls

Access to live or recorded CCTV will be restricted to authorised individuals who require access for their role.

- Individual user accounts should be used where the system permits.
- Strong passwords and appropriate access controls must be maintained.
- The CCTV recorder, network equipment and any physical storage media must be kept secure.
- Remote access must be appropriately secured and limited to authorised users.
- Access should be logged where the system supports audit logging.

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- Footage must not be copied to personal devices, personal email accounts, removable media or consumer cloud services.
- Screens displaying CCTV must be positioned so that unauthorised persons cannot routinely view them.

10. Retention of footage

CCTV footage will be retained for the shortest period necessary to meet the purposes stated. The practice will normally use an automatic overwritten cycle of **30 days** subject to the outcome of the practice's retention assessment.

Where footage is required because of a specific incident, complaint, safeguarding matter, suspected crime, legal claim, insurance matter or law-enforcement request, the relevant footage may be preserved beyond the normal retention period. The reason, scope and review date for the extended retention must be documented.

Once the retention period expires, footage will be securely deleted or automatically overwritten. The practice will not retain footage indefinitely merely because storage capacity allows it.

11. Reviewing and extracting footage

CCTV footage may only be reviewed where there is a legitimate reason connected to the purposes in this policy. Routine browsing of footage without a business or security need is prohibited.

- The reason for accessing footage should be recorded where practicable.
- Only the minimum relevant period and cameras should be reviewed.
- Where footage is exported, the export should be securely stored and its disclosure or use documented.
- Original footage should be preserved where it may be required as evidence.
- Where feasible, an audit trail should record who accessed, exported or disclosed footage.

12. Disclosure to the police and other third parties

CCTV footage will only be disclosed outside the practice where there is a lawful and appropriate basis. This may include requests from the police, courts, insurers, legal advisers, safeguarding bodies or other authorised organisations.

- The identity and authority of the requester should be verified.
- The request and lawful basis for disclosure should be documented.
- Only footage that is relevant and necessary should be disclosed.
- Where appropriate, third-party images should be redacted or otherwise protected.
- A record should be kept of what was disclosed, to whom, when and why.

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13. Requests for CCTV footage / individual rights

A person may have rights in relation to personal data contained in CCTV footage, including the right to request access to their personal data, subject to applicable exemptions and the rights of other individuals.

Any request for CCTV footage must be passed promptly to the practice's Data Protection / Information Governance Lead. Staff must not independently release footage in response to a request.

The practice will consider identification, time and location details, third-party privacy, applicable exemptions and any need for redaction before responding. CCTV footage must not be altered or deleted in order to frustrate a valid rights request.

14. Incidents, safeguarding and evidence

Where CCTV may contain evidence of a serious incident, violence or aggression, suspected crime, safeguarding concern, patient safety incident, significant property damage or other material event, relevant footage should be preserved promptly and the matter escalated through the appropriate practice procedure.

CCTV does not replace safeguarding, incident reporting, complaints, clinical governance or police reporting processes.

15. Staff monitoring and employment matters

CCTV must not be used routinely to monitor staff performance, attendance, productivity or behaviors unless this is necessary, proportionate, lawful and specifically assessed. Any proposal for systematic staff monitoring must be referred to the Practice Manager and Data Protection / Information Governance Lead and considered through an appropriate DPIA and employment consultation process where required.

16. Contractors and maintenance

Where a third-party CCTV installer, monitoring company, IT provider or maintenance contractor can access footage or systems, the practice will ensure appropriate contractual arrangements, confidentiality obligations, security requirements and data protection provisions are in place.

Contractor access must be limited to what is necessary for the agreed service and should be removed when no longer required.

17. Data breaches and loss of footage

Any suspected loss, unauthorised access, disclosure, copying, alteration, theft or compromise of CCTV footage or the CCTV system must be reported immediately to the Practice Manager / Information Governance Lead under the practice's data breach procedure.

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The practice will assess the incident, contain and investigate it, and make any required notifications within the applicable legal timescales.

18. Complaints

Concerns about CCTV should be raised with the Practice Manager or Data Protection / Information Governance Lead via email feedback.poplargo@nhs.net . The practice will investigate concerns in accordance with its complaints and information governance procedures. Individuals may also have the right to complain to the Information Commissioner's Office.

19. Review and monitoring

This policy will be reviewed at least annually and sooner where there is:

- A significant change to the CCTV system or camera coverage.
- A change in the purposes or lawful basis for processing.
- A significant incident, complaint or data breach.
- A change in legislation, ICO guidance or relevant NHS information governance requirements.
- A new technology or capability, such as audio recording, facial recognition or analytics.

20. Local CCTV system schedule – to be completed by the practice

Camera / area	Purpose	Recording	Retention	Authorised access
Camera 1- corridor rooms 4 - 5	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 2 – Corridor room C- Dirty Utility	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 3- Corridor room G- GP Car Park Exit	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 4- Main entrance overlooking drop off zone	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 5- Staff entrance by Room A	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners

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Camera 6- Fire exit by reception back office	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 7- Patient car park entrance	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 8- Reception overlooking script room	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 9- Purple Waiting Area	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 10_ Overlooking main reception entrance	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 11_ Corridor outside Room 21/22	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 12_ Reception Main desk with AUDIO	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 13_ GP Car Park	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 14_ Disabled bays rear entrance	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners
Camera 15_ Blue Waiting area	Security & Safety	24 Hours staff & Public	30 Days	Management Team & GP Partners

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21. Local contacts

CCTV / Practice Manager	Nargis Khan, Practice Manager
Data Protection / Information Governance Lead	Dr Sunil Pillai, Senior Partner
CCTV maintenance provider	Absolute Security 01483 791515
Practice privacy notice	https://www.poplar-grove.co.uk/media/kemnt34p/gp-privacy-notice-june-2026.pdf

22. Implementation checklist

- Confirm and document the exact purpose of each camera.
- Complete / review the CCTV Data Protection Impact Assessment.
- Confirm the lawful basis and any additional conditions required.
- Confirm the retention period and automatic overwrite settings.
- Check all camera angles for necessity and privacy.
- Confirm audio recording is disabled unless specifically justified.
- Install and maintain clear CCTV signage.
- Update the practice privacy notice.
- Restrict and review user access to the CCTV system.
- Document the process for police, safeguarding, legal and individual requests.
- Ensure contractors have appropriate contracts and confidentiality/data protection arrangements.
- Brief relevant staff on this policy and how to respond to CCTV requests.

23. Document control

This policy should be read alongside the practice's Information Governance Policy, Privacy Notice, Data Breach Procedure, Complaints Policy, Safeguarding Policy, Staff Code of Conduct and relevant record management arrangements.

Appendix 1 – Key guidance

The policy has been drafted with reference to current UK data protection principles and ICO guidance on CCTV/video surveillance, including guidance on accountability, transparency, security, retention, individual rights and DPIAs. The ICO's CCTV guidance is subject to review as a result of changes made by the Data (Use and Access) Act, so the practice should check the current ICO guidance when reviewing this policy.

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