

CCTV Policy for The Sandford Dental Practice

The Sandford Dental Practice utilises closed circuit television (CCTV) as part of its commitment to the safety and security of staff, patients, and property. This policy outlines the purpose, operation, and management of the CCTV system in compliance with relevant regulations, including the UK General Data Protection Regulation (GDPR), the Data Protection Act 2018, the ICO data protection code of practice for surveillance cameras and personal information, and GDC Standards.

Policy Review

This policy is reviewed annually and should be read in conjunction with the Data Protection Policy. The CCTV system and the images produced by it are managed by the Operations Manager, Kamrul Islam, with Diane Fewell serving as the data controller.

Purpose of CCTV Surveillance

CCTV surveillance is implemented for the following key purposes:

- **Crime Prevention:** To deter criminal activity and reduce the incidence of anti-social behaviour, including verbal and physical abuse, theft, and vandalism.
- **Incident Identification:** To assist in identifying offenders and collecting evidence in case of incidents.
- **Safety Promotion:** To enhance the health and safety of both staff and patients.
- **Asset Protection:** To safeguard the building and practice assets during and after business hours.

System Overview

The CCTV system comprises 9 fixed internal cameras, 5 fixed external cameras, two located at reception, which are equipped with audio recording. The Sandford Dental Practice owns the system, which involves continuous recording.

All authorised personnel with access to CCTV images are trained in the procedures for accessing recorded footage. They are aware of the restrictions on access to and disclosure of these images.



Ethical Use of CCTV

The use of the CCTV system will be conducted in a professional, ethical, and legal manner.

Justification for Use of CCTV

The decision to implement CCTV has been justified by the practice owners to ensure effective monitoring of public areas, focusing on capturing images related to anti-social or threatening behaviour, intruders, or individuals unlawfully removing goods.

Camera Location and Privacy Considerations

Cameras are strategically positioned to ensure that only relevant images are captured. Careful consideration will be given to privacy expectations:

- **Public Areas Monitored:** CCTV monitoring includes reception areas, waiting rooms, Offices any patients are taken to, entrances, exits, and corridors.
- **Private Areas Excluded:** CCTV will not be installed in private or personal areas such as treatment rooms or restrooms.

Covert Surveillance Policy

The Sandford Dental Practice will not engage in covert surveillance under any circumstances.

Notification and Signage

A copy of this CCTV Policy is available upon request for staff, patients, and visitors. Clear signage indicating that CCTV is in operation will be prominently displayed, including contact information for the data controller.

Storage and Retention of Images

Images captured by the CCTV system will be retained for a maximum of 90 days. If an image identifies a specific issue under investigation or prosecution, it will be retained beyond this period.

Secure Storage: Footage will be stored securely with restricted access. Only authorised personnel may access stored images.

Access Logs: A log of access to recorded images will be maintained to ensure accountability.

Access Protocols



The Sandford,

306 Broadway, Bexleyheath, Kent, DA6 8AA

T: 020 8303 7051 **E:** info@thesandford.com

W: www.thesandford.com

Access to recorded footage and monitoring equipment will be restricted to authorised personnel only. The following conditions apply to accessing footage:

Request Documentation: A record will be kept detailing any requests for access to footage, including the date, requester's name, organisation, reason for request, and how it was handled.

Viewing Opportunities: If permanent data provision is not feasible, data subjects will have the opportunity to view footage.

Permissible Access to Footage

CCTV footage may be accessed in specific circumstances:

- By police or their agents when required by law regarding suspected crimes.
- Following police requests when a crime has occurred or is suspected on the property.
- To assist in addressing unacceptable behaviour by staff or patients.
- By data subjects (or their legal representatives) under a Subject Access Request.
- By individuals (or their legal representatives) subject to a court order.
- By the practice's insurance company if required for pursuing claims related to property damage.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves as per the Data Protection Act. Requests must include:

Date, time, and location to facilitate identification of relevant footage.

The practice owner will respond to requests within 30 calendar days. Access may be denied if it would compromise legal rights or ongoing investigations. All necessary measures will be taken to mask third-party identities in shared footage.

Complaints Procedure

Complaints or enquiries about the operation of CCTV within The Sandford Dental Practice should initially be directed to the practice owner.



Staff Training and Responsibilities

Staff authorised to access the CCTV system will undergo training to comply with this policy. They must handle all information related to CCTV images securely. Misuse of surveillance information will lead to disciplinary actions.

Responsibilities of the practice owner (or nominated deputy) include:

- Ensuring that CCTV system use aligns with this policy.
- Overseeing CCTV monitoring for safety and security.
- Maintaining high standards for CCTV practices.
- Keeping detailed records regarding access and release of recorded materials.
- Ensuring that monitored areas respect individuals' reasonable expectations of privacy.
- Storing footage securely with access limited to authorised personnel.
- Retaining recorded images for no longer than 90 days unless required for criminal investigations or court proceedings.

If you have any further queries, please email them manager@thesandford.com

