

<b>BHI CCTV POLICY</b>	
<b>Owner</b>	<b>BHI-LS</b>
<b>Review date</b>	<b>June 2025 v11</b>

## INTRODUCTION

Closed circuit television (CCTV) is installed at BHI Parkside premises for the purposes of monitoring health & safety, security & crime (including theft and vandalism), traffic management, people & premises management. Cameras are located at various places on the premises, and images from the cameras are recorded. The scheme is controlled in-house by Data Controllers for BHI Ltd.

The use of CCTV falls within the scope of the Data Protection Act 1998 ("the 1998 Act") and the Home Office "Surveillance Camera Code of Practice" June 2013. This code of practice follows the recommendations issued by the Data Protection Commissioner in accordance with powers under Section 51 (3)(b) of the 1998 Act.

In order to comply with the requirements of the 1998 Act, data must be:

- Fairly and lawfully processed
- Processed for limited purposes and not in any manner incompatible with those purposes
- Adequate, relevant and not excessive
- Accurate
- Not kept for longer than is necessary
- Processed in accordance with individuals' rights
- Secure

## DATA PROTECTION STATEMENT

1. The BHI Management and the BHI Management Support team are the Data Controllers under Section 4(4) of the Act.
2. CCTV is installed for the purpose of health & safety, security & crime (including theft and vandalism), traffic management, people & premises management. Access to stored images will be controlled on a restricted basis within BHI Parkside.
3. Use of images, including the provision of images to a third party, will be in accordance with Bromsgrove Healthcare Innovations Ltd Data Protection registration and usually only passed to the Police.
4. External and internal signage is displayed on the premises stating the presence of CCTV.

## DEFINITIONS

CCTV: means cameras, devices or systems including fixed CCTV and any other systems that capture information of identifiable individuals or information relating to identifiable individuals.

DATA/IMAGES: means any data or images in respect of CCTV e.g. video images, static pictures etc.

DATA SUBJECT: means any individual who can be identified directly or indirectly from CCTV DATA. Data subjects include staff, tenants, guests, clients, suppliers and members of the public.

DATA CONTROLLER: are those of our employees whose work involves processing CCTV data, including those whose duties include operating CCTV to record, monitor, store and retrieve or delete images. Data Controllers must protect the CCTV data they handle in accordance with this policy.

## **RETENTION OF IMAGES**

Images from cameras are recorded on the computer system ("the recordings"). Recordings, will not be retained for longer than is necessary and no longer than **21 days**.

## **ACCESS TO IMAGES**

It is important that access to, and disclosure of, images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.

A list of cameras and Data Controllers can be found in Appendix 3

### **ACCESS TO IMAGES BY TENANT STAFF (including Churchfields Surgery, St Johns Surgery, Castle Nursery, Parkside Dental Practice, Catherine Adams Physiotherapy, Eyecare Opticians Parkside, Jhoots Pharmacy)**

Access to recorded images is restricted to the Data Controllers, who will decide whether to allow requests for access by Data Subjects and/or third parties (see below).

Viewing of images must be documented using the form at Appendix 2:

## **ACCESS TO IMAGES BY BHI STAFF**

Access to Live images of the following CCTV cameras has been granted to the BHI reception staff, site FM staff, the BHI Management team and the BHI Executive Board for purposes of monitoring and managing security and traffic as detailed below.

- CCTV cameras: D1, D3, D4, D5, D7, D9, D26 & D28- external- for the purpose of security.
- CCTV cameras: D11 & D12 – external – to monitor the external car park barrier for the purpose of security and management of the car traffic.
- CCTV cameras: D2, 8, 10, 13,14,16,17,21,22 & 25 -internal - for the purpose of security, maintenance, health & safety and the management of patient traffic within the building

Access to the CCTV camera images above by BHI staff is restricted for the specific use as detailed. All other access to recorded images is otherwise restricted to the Data Controllers who will decide whether to allow requests for access by Data Subjects and/or third parties (see below).

Viewing of images must be documented using the form at Appendix 2:

Access to recorded images will be given by data controllers to BHI Executive Board upon request without the completion of Appendix 2, so long as this policy is adhered to, a business reason is provided, feedback on any outcome is given and compliance with the destruction of any copied images being adhered to by the Executive Director requesting the data.

## **ACCESS TO IMAGES BY THIRD PARTIES**

Requests for access to images will be made using the 'Application to access to CCTV images' form (which is at Appendix 1), accompanied by a £10 fee (which is non-refundable if the request is declined), images will only be released via a law enforcement agency (Police).

The Data Controllers will assess applications and decide whether the requested access will be permitted or following a request by a law enforcement agency. Disclosure of recorded images to third parties will only be made in limited and prescribed circumstances. For example, in cases of the prevention and detection of crime, disclosure to third parties will be limited to Law enforcement agencies where the images recorded would assist in a specific criminal enquiry

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

## **ACCESS BY DATA SUBJECTS**

This is a right of access, which is provided by section 7 of the 1998 Act. Requests for access to images will be made using the 'Application to access to CCTV images' form (which is at Appendix 1), accompanied by a £10 fee (non-refundable if the request is declined).

Individuals should also be provided with the BHI Parkside **CCTV Policy** which describes the type of images which are recorded and retained, the purposes for which those images are recorded and retained, and information about the disclosure policy in relation to those images.

## **PROCEDURES FOR DEALING WITH AN ACCESS REQUEST**

All requests for access by Data Subjects will be dealt with by the Data Controllers.

The Data Controllers will locate the images requested. The Data Controllers will determine whether disclosure to the Data Subject would entail disclosing images of third parties.

The Data Controllers will need to determine whether the images of third parties are held under a duty of confidence. In all circumstances Bromsgrove Healthcare Innovation's indemnity insurers will be asked to advise on the desirability of releasing any information.

If third party images are not to be disclosed, the Data Controllers will arrange for the third party images to be disguised or blurred. If the CCTV system does not have the facilities to carry out that type of editing, an editing company may need to be used to carry it out. If an editing company is used, any associated costs for this will be payable by the Data Subject requesting the images. The Data Controllers must ensure that there is a contractual relationship between them and the editing company, and;

- That the editing company has given appropriate guarantees regarding the security measures they take in relation to the images
- The written contract makes it explicit that the editing company can only use the images in accordance with the instructions of the Data Controllers
- The written contract makes the security guarantees provided by the editing company explicit

The Data Controllers will provide a written response to the Data Subject within 21 days of receiving the request setting out the Data Controllers' decision on the request.

A copy of the request and response should be retained.

## **COMPLAINTS**

Complaints must be in writing and addressed to the Data Controller. Where the complainant is a third party, and the complaint or enquiry relates to someone else, the written consent of the patient or Data Subject is required. All complaints will be acknowledged within 7 days, and a written response issued within 21 days.

## **ENQUIRIES**

All enquiries regarding this policy should be made to Lindsey Sharp, BHI Business Manager.

## APPENDIX 1

### DATA PROTECTION A - APPLICATION FOR CCTV DATA ACCESS

**ALL Sections must be fully completed. Please pass the completed form to a member of the BHI Management team for approval.**

Name and address of Applicant	
Contact Telephone number of Applicant	
Email address of Applicant	
Name and address of "Data Subject" – i.e. the person whose image is recorded	
If the Data Subject is not the person making the application, please obtain a signed consent from the Data Subject opposite	Data Subject signature.....
If it is not possible to obtain the signature of the Data Subject, please state your reasons.	
Please state your reasons for requesting the image.	
Date on which the requested image was taken.	
Time at which the requested image was taken.	
Location of the Data Subject at time image was taken (i.e. which camera or cameras.)	
Full description of the individual, or alternatively, attach to this application a range of photographs to enable the Data Subject to be identified by the operator.	

On receipt of a fully completed application and the £10 fee, a response will be provided as soon as possible, and in any event within 40 days. In the event of a declined application the fee is non-refundable. Images will only be issued via a law enforcement agency (the Police).

BHI USE ONLY	BHI USE ONLY
Access granted: <b>Yes/No</b> (delete as appropriate)	Access <b>not</b> granted: <b>Yes/No</b> (delete as appropriate) Reason for not granting access:
Data Controller's name:.....	
Signature:.....	
Date:.....	

## APPENDIX 2

### BHI PARKSIDE CCTV POLICY

#### RECORD OF ACCESS TO CCTV DATA

Name of person accessing data	Date and time	Name of person viewing data	Reason for viewing (incl crime number if applicable)	Data Removed Y / N	Signature of person removing if applicable

## LIST OF CAMERAS AND DATA CONTROLLERS

## Appendix 3

CAMERA	LOCATION	AREA COVERS
D1	BHI STAFF CARPARK	BHI AND TENANT PARKING BAYS
D2	PLANT ROOM 2	PLANT ROOM 2
D3	PHARMACY FRONT DOOR	MARKET STREET SIDE CORNER OF BULDING FACING DOWN TOWARDS EYECARE DOOR
D4	STAFF CAR PARK	SJS AND CFS CARPARK BIOMASS SIDE, CLINICAL WASTE SOTRE AND LIQUID NITROGEN
D5	EYECARE	EYECARE FRONT DOOR, MARKET STREET SIDE FACING UP TOWARDS LIBRARY
D6	NURSERY/DENTIST COURTYARD	NURSERY AND DENTISTS COURTYARD ALSO SHOWING BHI SHED
D7	MARKETS STREET STAFF ENTRANCE	STAFF ENTRANCE DOOR ON MARKET STREET ALSO SHOWING CATHERINE ADAMS DOOR
D8	GROUND FLOOR WAITING AREA	WAITING AREA FROM ABOVE ACESO 1 DOOR TOWARDS HPR
D9	CARPARK AND BARRIERS	BARRIERS AND BARRIER SIDE OF CARPARK FROM SJS PM OFFICE BALCONY
D10	BHI FRONT DOOR	BHI ENTRANCE
D11	PAYSTATION	PAYSTATION, PAYSTATION SIDE OF CARPARK AND OVERFLOW CARPARK FROM DR HEATHS BALCONY
D12	BARRIERS	CLOSER VIEW OF CARPARK BARRIERS FROM SJS PM OFFICE BALCONY
D13	2 <sup>ND</sup> FLOOR LIFT LOBBY	ACROSS LIFT LOBBY FROM ABOVE TOILETS
D14	STAFF CRAPARK ENTRANCE GATES	STAFF CARPARK ENTRANCE GATES ALSO COVERING BIN STORE AND TURNING HEADS
D15	DENTIST FRONT DOOR	DENTIST FRONT DOOR, MARKET STREET SIDE
D16	BHI RECEPTION	BHI RECEPTION DESK FROM TV SIDE FACING FRONT DOORS
D17	FIRST FLOOR ATRIUM	FIRST FLOOR TOWARDS STAIR WELLS
D18	CFS SURGERY WAITING AREA	CFS WAITING AREA FROM ABOVE CHILDRENS PLAY AREA
D19	2 <sup>ND</sup> FLOOR WAITING AREA	2 <sup>ND</sup> FLOOR WAITNG AREA AND SJS WAITING AREA BELOW
D20	NURSERY FRONT DOOR	NURSERY FRONT DOOR AND SOM EOF STAFF ENTRANCE, PLUS SJS DR PARKING BAYS AND TURNING HEAD
D21	SJS SURGERY WAITING AREA	SJS WAITING AREA FROM ROLLER SHUTTERS TOWARDS GLASS WALL
D22	NURSERY OUTSAIDE PLAY AREA – BABIES	NURSERY COURTYARD – OUTSIDE BABY ROOM
D23	DENTIST WAITING AREA	DENTIAST WAITING AREA TOWARD DOOR AND RCEPTION DESK
D24	CATHERINE ADAMS DESK AND WAITING AREA	CATHERINE ADAMS DESK AND WAITING AREA FROM BEHIND DESK TOWARDS DOOR

D25	SJS RECEPTION DESK AND WAITING AREA	SJS RECEPTION DESK AND WAITING AREA FROM ABOVE DESK TOWARD WAITING AREA
D26	BIKE RACK	BIKE RACK TOWARD BHI FRONT ENTRANCE AND DISABLED PARKING BAYS
D27	CFS RECEPTION DESK AND WAITING AREA	CFS RECEPTION DESK AND WAITING AREA FROM ABOVE DESK TOWARD WAITING AREA
D28	CFS DOCTORS AND NURSERY DIAGONAL PARKING	CFS DOCTORS AND NURSERY DIAGONAL PARKING
D29	ELECTRICAL CABINET	ELECTRICAL CABINET
D30	LIQUID NITROGEN	STAFF PATIO AND CLINICAL WASTE STORE

<b>DATA CONTROLLERS</b>	<b>CAMERA ACCESS</b>	<b>CAN APPROVE ACCESS REQUESTS</b>
BHI EXEC MANAGER	ALL	YES
BHI BUSINESS MANAGER	ALL	YES
BHI FACILITIES MANAGER	ALL	YES
BHI FM ASSISTANT MANAGER	ALL	YES
BHI ASSISTANT MANAGER	ALL	YES
BHI ADMIN ASSISTANT	ALL	NO
BHI SITE FACILITATORS	ALL	NO
BHI RECEPTION TEAM	D1, D4, D11, D12	NO



## CHANGE CONTROL

DATE	CHANGE	ISSUE
22/8/2013	Addition of camera 11 to BHI staff access	2
15/06/2017	Addition to Data Controllers list. Update of new camera numbers.	3
17/05/2018	Addition to Data Controllers list. Update of new camera numbers. Update number of days recordings go back.	4
23/11/2018	Addition of email and telephone contact details on Appendix 1	5
14/02/2019	Addition of BHI Executive Directors to the Access to images by BHI Staff section. Addition of Camera 28	6
07/10/2020	Update and removal of team names, to include current job roles only.	7
13/01/2022	Addition of BHI Finance & Admin Assistant to the Access to images by BHI Staff section.	8
14/01/2023	Addition of scheme controller to opening section. Update to purpose of scheme.	9
01/08/2024	Removal of access to parties other than law enforcement agencies. Include camera table and data controller table Appendix 3 Update to CCTV posters Update Lloyds to JHOOTS	10
03/06/2025	Moved camera 2,10 from outside list to internal list. Updated list of reasons for internal cameras to be monitored to include health and safety and maintenance. Inclusion of Management Support Team in description of Data Controllers and BHI Admin into the list of cameras seen by Data Controllers	11