

## CCTV Policy

The use of closed circuit television at Dental Specialists MK aims to comply with the Data Protection Act (1998), the ICO CCTV Code of Practice (2008) and with GDC Standards. This policy is reviewed on an annual basis and should be read in conjunction with the Data Protection Policy (M 233-DPT). The CCTV system and the images produced by it are managed by the Data Controller Mrs Peju Arole.

CCTV has been installed in the practice due to protect patients and staff security whilst in the practice.

Practice management has considered whether any other methods would be suitable to meet this need and decided that CCTV is the best solution. We carry out an annual review of our decision and system chosen using the Annual CCTV Checklist (M 216B). We do not record patient consultations or treatment as the ethical and consent considerations are complex and patients expect a high degree of privacy during treatment.

Images captured with CCTV will be kept securely and destroyed securely after 12 months. Images will only be used for the purposes for which they have been collected. However, it may be necessary to use information recorded on CCTV to assist with a disciplinary investigation where there is a clearly justifiable business case to do so.

CCTV cameras, which record data in the practice, are located in and cover the following areas: reception, downstairs corridor, front entrance and rear car park.

To meet requirements:

- The Practice has notified the Information Commissioner's Office (ICO) that we use CCTV and our reasons for doing so
- The Data Controller is responsible for managing the CCTV system
- The camera system has been chosen to produce clear images that reduce any privacy risks
- Cameras have been sited with consideration to producing clear images and to avoid capturing images of persons not visiting the practice. The cameras are not capable of sound recording
- There are clearly visible signs showing that CCTV is in operation [for the purpose of crime prevention] and who is responsible for the recording
- Images from the CCTV system are securely stored for [three months], to allow an incident to come to light and be investigated. Following this period the images are permanently erased
- Only the Practice Owner, Dr Bola Soyombo, Data Controller and Practice Manager Mrs Ola Alara are authorised to have access to the images
- Images will not be disclosed to third parties except to police when a suspected criminal offence has been committed
- The practice will respond to subject access requests from individuals for copies of their own images as described in our data protection policy (M 233-DPT)
- The CCTV system is regularly checked to ensure that it is working properly and capturing clear images