

CCTV Policy

West Midland Referrals Ltd has installed high quality closed circuit television (CCTV) with audio and visual recording around the perimeter of their Errisbeg House building, and within the reception and consulting areas.

This policy sets out the use and management of the CCTV equipment and images and recordings at West Midlands Referrals.

Purposes of CCTV at West Midlands Referrals

The intended purpose of the Practice installing and using CCTV and audio systems includes:

- To ensure a safe and secure environment for clients, pets, contractors, visitors and staff
- To ensure that health and safety rules and practice procedures are complied with
- To monitor the security of the business premises and property
- To provide records of verbal communications between staff and clients

Location of cameras

Cameras are located at strategic points in and around the practice, including the external periphery of the building, reception and consulting rooms.

All cameras are clearly visible

Appropriate signs are prominently displayed at the entrance so that employees, clients, and other visitors are warned that they are entering an area covered by CCTV.

Recording and retention of audio and images

High quality images are produced by the CCTV equipment so that they are effective for the purposes set out above. Images are recorded continuously, "24-7". The norm is to store CCTV audio-visual records on a hard drive for a period of approximately 2-3 years. Once a hard drive has reached the end of its use it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. Where a law enforcement agency is investigating a crime, images on the hard drive may need to be retained for a longer period.

Access to and disclosure of audio and images

Access to, and disclosure of, CCTV recordings is restricted. This ensures that the rights of individuals are retained and protected. Recordings can only be disclosed in accordance with the purposes for which they were originally collected. The recordings are held in a secure central location. Access to

recordings is restricted to the operators of the CCTV system and to those senior staff members who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring.

If media on which recordings are stored are removed for viewing purposes, this will be documented.

Disclosure of recordings to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police, other law enforcement agencies, and prosecution agencies (eg the Crown Prosecution Service) where the recordings could assist in the prevention or detection or prosecution of a crime, the identification and prosecution of an offender, or the identification of a victim or witness.
- Relevant legal representatives.
- Line managers involved with company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).
- External formally recognised veterinary bodies and veterinary agencies who might be involved in the resolution of any dispute. Such bodies / agencies might include, but are not limited to, The Royal College of Veterinary Surgeons and The Veterinary Defence Society.

The Directors of the Practice are the only people permitted to authorise disclosure of recordings to external third parties and agencies including as law enforcement agencies.

All requests for disclosure and access to recordings will be documented, including:

- The date and the recipient of the disclosure of the recordings
- The reasons why they are required
- Where relevant, a crime incident number to which the images may be relevant to legal proceedings
- The place to which the recordings will be taken
- A signature of any collecting police / law enforcement officer, where appropriate
- The date and time of replacement of records into secure storage will be noted
- The reason for any denial of disclosure.

Individuals' access rights

You have the right on request to receive a copy of the personal data that the Practice holds about you, including audio and CCTV images if you are recognisable from the image.

If you wish to access any audio or CCTV images relating to you, you must make a written request addressed to the Practice Directors. You can't make a request for information relating to other persons (other than where you are the adult who is legally responsible for the other persons such as a parent or guardian requesting recordings relevant to their child).

Your request must include the date and approximate time when the images were recorded and the location of the CCTV camera, so that the images can be easily located, and your identity can be established as the person in the images.

Any request must include copies photographic proof of your identity (and/or of any relevant person in your care) such as passport, driving licence etc, sufficient to allow confirmation that any recordings relate to the person in question.

We will endeavour to respond promptly and in any case we will do so within 30 calendar days of receiving the request.

We will first determine whether disclosure of recordings relevant to your request will reveal third party information, as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If we are unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised in writing accordingly.

Staff training

We will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the systems.

Implementation

The Directors are responsible for CCTV policy implementation and compliance, and for the operation and maintenance of the CCTV system. They will monitor the use of CCTV within the practice.

Enquiries and correspondence relating to CCTV operation and policy at West Midlands Referrals

Any questions, comments, requests, complaints or enquiries regarding this CCTV policy and the operation of our CCTV system should be addressed in writing to the Directors of the practice.

This Policy was last updated in June 2019