## SHEERWATER HEALTH CENTRE

## Data Protection Impact Assessment for CCTV System

# Submitting controller details

|  |  |
| --- | --- |
| Name of controller | Sheerwater Health Centre |
| Subject/title of DPO  | Close-Circuit Television (CCTV) |
| Name of controller contact /DPO (delete as appropriate) | Sheerwater Health CentreDPO Mrs Nine Taylor |

# Step 1: Identify the need for a DPIA

|  |
| --- |
| Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA. |
| **What is the aim of the project?**The CCTV system aims to achieve the following:-* Improve the health and safety and security of patients, staff and visitors
* Provide assistance in the event a crime is committed

The practice will update its Privacy policy for CCTV System |

# Step 2: Describe the processing

|  |
| --- |
| **Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved? |
| The CCTV system provides the practice with images from 2 fixed cameras. These are located as indicated below1. Dome camera ceiling mounted to the rear of the reception area looking back at the main entrance door
2. Dome camera ceiling mounted to the front of the reception area looking back at the reception itself

The images are transmitted to a network video recorder located in the practice manager’s office. The system has been programmed to keep the recordings for a maximum of thirty days after which time the previous images are overwritten**Will you be sharing data with anyone?**CCTV images could be shared with the police in the event of criminal activity, if deemed necessary by the GPs. **What types of processing identified as likely high risk are involved?**Recording and retention of images securely. Appropriate data retention applied to imagesIndividuals can request copies of CCTV data which contain their personal information by submitting a subject access request |

|  |
| --- |
| **Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover? |
| **What is the nature of the data?**The CCTV data is video recorded**How much data will you be collecting and using?**The CCTV system records continuously 24 hours per day, 7 days per week**How long will you keep it?**The system has been programmed to keep recording for a maximum of thirty days after which time the previous images will be overwritten**What geographical area does it cover?**The system captures images within the surgery building |

|  |
| --- |
| **Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)? |
| **What is the nature of your relationship with the individuals?**The practice provides healthcare to the local community. A number of patients, staff and visitors access the surgery each week between Monday and Friday. The surgery closed on Saturday and Sunday**How much control will they have?**The practice informs patients, staff and visitors the presence of CCTV recording with signs prominently displayed at a number of locations. The CCTV system is capable of identifying individuals from the recordings**Would they expect you to use their data in this way? Do they include children and vulnerable groups?**The presence of CCTV system potentially increases safety of people visiting the practice. There are no cameras in toilet areas or consulting rooms as expected by those visiting the practice. |

|  |
| --- |
| **Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?  |
| **What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?*** The presence of CCTV system potentially increases safety of people visiting the practice.
* Potentially provides assistance in deterring and detection of crime.
 |

# Step 3: Consultation process

|  |
| --- |
| **Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals’ views – or justify why it’s not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts? |
| The CCTV system was installed by EMCOR Fire & SecurityThe installation of the system was agreed by GPs and practice managersPatient Participation Group were informed of the intention to install the CCTV system for potential benefit of patients, staff and visitors |

# Step 4: Assess necessity and proportionality

|  |
| --- |
| **Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers? |
| **What is your lawful basis for processing?**The safety and security of staff, patients, and visitors at Sheerwater Health Centre is of paramount importance. To support the management team in maintaining a safe and secure environment, a CCTV system is used within the practice premises. This system has been installed and is used in accordance with extant legislation:  • Equality Act 2010  • GDPR (General Data Protection Regulations)  • Data Protection Act 2018  • Surveillance Camera Code of Practice 2013**Does the processing actually achieve your purpose?**Camerasare located in areas where staff, patients and visitors have access. No cameras are located in areas where privacy is required.**What information will you give individuals?**Signs about CCTV cameras in prominent places inform staff, patients and visitors about videorecording in place**How will you help support their rights?**The practice has a Subject Access Request Policy |

# Step 5: Identify and assess risks

|  |  |  |  |
| --- | --- | --- | --- |
| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary.  | **Likelihood of harm** | **Severity of harm** | **Overall risk**  |
|  | Remote, possible or probable | Minimal, significant or severe | Low, medium or high |
| Violent and abusive patient | Possible | Significant | High |
|  |  |  |  |

# Step 6: Identify measures to reduce risk

|  |
| --- |
| **Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5** |
| **Risk**  | **Options to reduce or eliminate risk** | **Effect on risk** | **Residual risk** | **Measure approved** |
|  |  | Eliminated reduced accepted | Low medium high | Yes/no |
| CCTV maintenance | Maintenance contract in place | Reduced | Low | Yes |
| CCTV policy and procedure | Policy in place | Reduced | Low | Yes |
| Privacy notices | Privacy notice updated | Reduced | Low | Yes |

# Step 7: Sign off and record outcomes

|  |  |  |
| --- | --- | --- |
| **Item**  | **Name/position/date** | **Notes** |
| Measures approved by: | Nine TaylorPractice Manager | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: | Nine TaylorPractice Manager | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: |  | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| Summary of DPO advice: |
| DPO advice accepted or overruled by: |  | If overruled, you must explain your reasons |
| Comments: |
| Consultation responses reviewed by: |  | If your decision departs from individuals’ views, you must explain your reasons |
| Comments: |
| This DPIA will kept under review by: |  | The DPO should also review ongoing compliance with DPIA |