

CCTV Privacy Impact Assessment (PIA)

The CCTV system where personal data is processed has been subjected to a PIA. The aim was to identify any unacceptable risks to an individual's privacy. The areas the PIA identified were:

- What data is processed
- Who has access to the data
- Where data is stored.

1	<p>Salisbury NHS Foundation Trust will be recording CCTV images via 130 cameras across the entire hospital site.</p> <p>Salisbury NHS Foundation Trust will take legal responsibility under Data Protection Rules and Regulations.</p> <p>This PIA is completed to support the CCTV Policy. The Policy will ensure compliance with current legislation and codes of practice.</p>
2	<p>The overall purpose of the CCTV system is to help in the reduction of and investigation of crime, to protect Trust staff and to protect Trust premises from criminal activities. The purposes are in accordance with the following rationale:</p> <ul style="list-style-type: none"> • To assist in the prevention and detection of crime against both persons and property. • To facilitate the identification, apprehension and prosecution of offenders in relation to crime. • To ensure the security of property belonging to the Trust and to employees and visitors of the Trust.
3	<p>The benefits to be gained from its use are</p> <p>Increased deterrent – cameras and signage are in prominent positions and high traffic areas. Areas identified as either vulnerable to vandalism or where a number of incidents have previously occurred have cameras installed.</p> <p>Reduced theft – opportunistic rather than targeted thefts occur on the site. In areas identified as vulnerable to theft, cameras will provide a level of increased security due to their high visibility.</p> <p>Increased detection – the assistance in identifying perpetrators of crimes once committed will be possible through the high resolution cameras. High levels of aggressive and violent behaviour as well as vandalism in the Emergency Department area will be captured on CCTV and the images used as supporting evidence in prosecutions.</p> <p>Reduced fear of crime – the presence of cameras and appropriate signage should provide a level of reassurance to staff, patients and visitors.</p>
4	<p>The level of CCTV technology can realistically deliver the benefits outlined in Section 3. All camera installations are in main corridor streets, covering main entrances, waiting areas and car parks. No cameras will be installed in patient treatment or therapy areas.</p> <p>Consideration has been given to less privacy-intrusive solutions, such as improved lighting. However these measures have been implemented but without a noticeable difference in the level of reported incidents. It was concluded that whilst less obtrusive solutions may contribute they do not achieve the same objectives.</p>

APPENDIX H

	The use of CCTV, lighting and security guarding as an integrated security system all elements are commensurate with each other.
5	The images need to be of identifiable individuals in order to progress and assist investigations and be credible evidence in court hearings. The introduction of HD Cameras has increased the quality of images and those older analogue cameras have been replaced by HD to enhance the system further. Compliance with the Home Office guidelines ensures the systems captures images only in public accessed areas and does not record any sound.
6	The CCTV delivers the desired benefits now and will remain suitable for the foreseeable future. The system uses HD cameras All recordings will be on the main server in the CCTV Control Room. Recordings are kept in accordance with CCTV Codes of Practice.
7	There may be future demands that arise for wider use of images. The system can be added to in terms of number of cameras, the quality of images increased by installing increased mega-pixel cameras and the recording capacity can be increased.
8	<p>Through consultation via circulation to the SMC and H & S Committees which include the Staff Side, staff favour the system which provides enhanced reassurance, particularly out of hours, and the deterrent factor.</p> <p>The hospital has used a CCTV system since 1995 without any adverse comments from patients or visitors.</p> <p>It is a general acceptance that CCTV is present in high traffic, general areas but not installed in patient treatment areas for this purpose.</p>
9	<p>In order to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed, access to the system will be restricted to the security team, LSMS and IT support. Access to the system will be governed by password and only able to be accessed from the CCTV Control Room with a monitoring only facility in the Emergency Department.</p> <p>The CCTV system has been risk assessed to ensure compliance with the Data Protection Rules and Regulations and also the sharing of information. This was assessed as Low 2.</p> <p>Annual Audit of the CCTV system will take place to ensure on-going compliance with Appendices 1,2,3 of the ICO Codes of Practice.</p> <p>Routine surveillance will not take place – surveillance for missing patients being the most likely use for live images to be viewed. A majority of image viewing will be retrospective after an incident has occurred.</p>

Completed by: Keith Loader
 LSMS

Approved: Heidi Doubtfire-Lynn
 Information Governance Manager.