

**Reference Number:** UHB 303  
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## **CCTV Control and Use Operational Procedures**

### **Introduction and Aim**

A Closed Circuit Television (CCTV) system has been introduced to the Cardiff and Vale Health Board, which comprises of a number of cameras installed at strategic locations. The operational capabilities of the cameras are varied; some are PTZ (pan, tilt and zoom), while others are static cameras presenting fixed images.

Monitoring and control facilities are located at sites within the Cardiff and Vale Health Board, recording facilities are only located within CCTV monitoring rooms.

The 'owner' and 'data controller' of the system is the Cardiff and Vale Health Board and for the purposes of the General Data Protection Regulation the 'Data Controller' is the Cardiff and Vale Health Board representative, the Data Protection Officer. The 'System Manager' with day- to-day responsibility for the data is the Cardiff and Vale Health Board Security Manager.

The Head of Commercial Serviced is the Cardiff and Vale Health Board representative of the CCTV system owners and will have unrestricted personal access to the CCTV monitoring room and receive regular reports from the manager of the system. The Cardiff and Vale Health Board 'Security Strategy' committee has specific responsibility for receiving and considering these reports.

Data will be processed in accordance with the principles of the General Data Protection Regulation which summarised are, but is not limited to:

- All personal data will be obtained and processed fairly and lawfully.
- Personal data will be held only for the purposes specified.
- Personal data will be used only for the purposes, and disclosed only to the people, shown within this policy.
- Only personal data will be held which are adequate, relevant and not excessive in relation to the purpose for which the data are held.
- Steps will be taken to ensure that personal data are accurate and where necessary, kept up to date.
- Personal data will be held for no longer than is necessary.
- Individuals will be allowed access to information held about them and, where appropriate, permitted to correct or erase it.
- Procedures will be implemented to put in place security measures to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of, information.

The purpose of this procedure is to state the intention of the owners and the managers, as far as is reasonably practicable, to support the objectives of Cardiff and Vale Health Board CCTV System. The purpose and reason for implementing the CCTV system is as

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previously defined and in order to achieve the objectives of the Cardiff and Vale Health Board

### Objectives

- The objective of the procedure is to ensure the use of CCTV cameras throughout the Health Board will be in installed and used in compliance with the principles of the General Data Protection Regulation, Human Rights Act 1998, Regulation and Investigatory Powers Act 2000 and other relevant legislation.
- The Regulation of Investigatory Powers Act 2000 regulates the use of covert/directed surveillance and is subject to a strict code of practice. Use of CCTV in these circumstances or for any other reason other than that authorised in accordance with this procedure is not covered by this procedure and in such circumstances further guidance should be sought.

### Scope

This procedure applies to all of our staff in all locations including those with honorary contracts

### Equality Impact Assessment

An Equality Impact Assessment (EqIA) has been completed and this found there to be no impact.

### Documents to read alongside this Procedure

- [CCTV Closed Circuit Television Policy](#)
- General Data Protection Regulation  
<https://gdpr-info.eu/>
- Data Protection Act 1998 -  
<http://www.legislation.gov.uk/ukpga/1998/29/contents>
- CCTV Code of Practice, revised edition, 2008: Information Commissioner's Office -  
[https://ico.org.uk/for\\_organisations/data\\_protection/topic\\_guides/cctv](https://ico.org.uk/for_organisations/data_protection/topic_guides/cctv)
- Human Rights Act 1998 -  
<http://www.equalityhumanrights.com/your-rights/human-rights/what-are-human-rights/human-rights-act>
- Regulation of Investigatory Powers Act 2000 -  
<http://www.legislation.gov.uk/ukpga/2000/23/contents>
- Freedom of Information Act 2000 (section 40) -  
<http://www.legislation.gov.uk/ukpga/2000/36/section/40>

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	<ul style="list-style-type: none"> <li>Information Commissioner's Office – <a href="http://www.ico.gov.uk">www.ico.gov.uk</a></li> <li>Guidance for the Police use of Body-Worn Devices published July 2007, Police and Crime Standards Directorate - <a href="http://library.college.police.uk/docs/homeoffice/guidance-body-worn-devices.pdf">http://library.college.police.uk/docs/homeoffice/guidance-body-worn-devices.pdf</a></li> </ul>
<b>Approved by</b>	Security/Personal Safety Strategy Group
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<p><b><u>Disclaimer</u></b></p> <p><b>If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the <a href="#">Governance Directorate.</a></b></p>	

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<b>Summary of reviews/amendments</b>			
<b>Version Number</b>	<b>Date of Review Approved</b>	<b>Date Published</b>	<b>Summary of Amendments</b>
1	06/10/2015	23/08/2016	Supersedes previous Trust document reference number 103
2	22/01/2019	30/07/2019	3 Yearly review period

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## **Appendices**

[Application to Access CCTV Images](#)

[Body Worn CCTV System for Security Officers](#)

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## **CCTV Control and Use Operational Procedure**

### **1. Purpose**

The purpose of this document is to ensure:

- That the use of the Health Boards Closed Circuit Television (CCTV) adheres to the principles of the General Data Protection Regulation, Human Rights Act 1998, Regulation Investigatory Powers Act 2000 and other relevant legislation
- That the CCTV system is not abused or misused
- That the CCTV is correctly and efficiently installed and operated
- That the CCTV is only accessible to authorised individuals

The overall purpose of CCTV schemes is to help in the reduction of and investigation of crime, to protect Health Board staff and to protect Health board premises from criminal activities. The purposes are in accordance with the following rationale:

- 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 Health Board employees and visitors to the Health Board.

### **2. Scope**

The Procedure Applies to all employees of the Health Board and for whatever purpose is present on Health Board premises.

### **3. Ownership and Operation of CCTV**

The Cardiff and Vale University Health Board is the 'data controller' for all CCTV systems operating on its premises. The Health Board is responsible for all cameras, monitors and data collection and retention processes.

### **4. Principles**

- The system will be operated in accordance with all the requirements and articles of the Human Rights Act 1998.

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- The operation of the system will also recognise the need for formal authorisation of surveillance as required by the regulation of investigatory Powers Act 2000, in particular Part 2 of the Act.
- The system will be operated in accordance with the General Data Protection Regulation at all times.
- The system will be operated fairly, within the law, and only for the purpose for which it was established and identified within this procedure.
- The system will be operated with due regard to the principle that everyone has the right to respect for their private family life and their home.
- The public interest in the operation of the system will be safeguarded by ensuring the security and integrity of operational procedures.
- Throughout this procedure it is intended, as far as reasonably possible, to balance the objectives of the CCTV system with the need to safeguard the individuals rights.
- Every effort has been made throughout the procedure to indicate that a formal structure has been put in place, including a complaints procedure, by which it can be identified that the system is not only accountable, but is seen to be accountable.
- Participation in the System by any organisation, individual or authority assumes an agreement by all such participants to comply fully with this policy and to be accountable under the Office of the Information Commissioner's Code of Practice.

## 5. General Data Protection Regulation

The Health Boards Data Protection Manager will identify and include all its schemes within the notification which is required to do so under the terms of the General Data Protection Regulation

All schemes will operate in accordance with the guidelines set out in the 'CCTV Code of Practice' published by the Information Commissioners Office. In order to conform to this Code of Practice, the following guidelines must be adhered to:

- The Health Boards Head of Commercial Services, Security Services operating such schemes, will be responsible for overseeing that monitoring of all images are in accordance with this policy and that suitable operation, back up, retention, destruction and maintenance of all storage media is conducted in accordance with the written operational procedures manual kept within the site control room.
- Cameras will not be hidden from view and appropriate steps must be taken, e.g. by signing and displaying posters, to inform the public of the presence of the system and its ownership at all times.



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- To ensure privacy, images from the system are viewed by trained and authorised staff, where a camera is there not to protect patients or staff, but property, then the camera's should be fixed and focused.
- Images from the cameras are appropriately recorded with existing operational procedures.

## 6. Directed Surveillance

Directed surveillance can be undertaken with the consent of the proper authorities and in accordance with the Law, The regulation of investigatory Powers Act 2000 regulates the use of directed surveillance of this type and is subject to a strict code of practice.

The Health Board should satisfy itself that there are grounds for suspecting criminal activity or equivalent malpractice and that notifying individuals about the monitoring would prejudice its prevention or detection. It should only be considered in exceptional circumstances, any member of staff wishing to use directed CCTV surveillance should consult the Security Manager and the Data Protection Manager.

Directed surveillance should be strictly targeted at obtaining evidence within a set timeframe and should not continue after the investigation is complete. Cameras should not be placed in areas which you would reasonably expect to be private (e.g. toilets). There may be exceptions to this in cases of suspicion of serious crime whereby there is police involvement.

The minimum number of people possible should be involved in the investigation. Prior to each investigation, clear rules should be set up limiting the disclosure and access to the information obtained.

Directed surveillance can only be carried out with the authorisation/instruction from the Head of Commercial Services, Security Services and or the Police. The Health Boards Chief Executive should be notified to inform that covert surveillance is being carried out.

## 7. Roles and Responsibilities

It is the responsibility of the Chief Executive as overall owner and data controller of the CCTV system. He has delegated these responsibilities to the Director of Planning.

**The following members of staff have specific responsibility for the management of the CCTV systems on Health Boards sites.**

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### **7.1 Health Board Head of Security**

Is responsible for the operational management of the CCTV systems operated by the security staff, The Manager will ensure that the use and management of the system is in keeping with the CCTV policy, monitor compliance and report any breaches to the Head of Health and Safety, Security Services.

The Security Manager shall be responsible for ensuring that future development of CCTV Systems is approved in accordance with the requirements of legislation. Act as the link with the Head of Commercial Services, Security Services, and Data Protection Manager with respect to the legislation covered by this policy.

To notify persons on Health Board property where CCTV is installed and that a CCTV scheme is in operation by clear notices placed around the sites and areas of CCTV.

### **7.2 Head of Health and Safety, Security Services**

The Head Commercial Services has overall responsibility for the Strategic planning of the CCTV.

### **7.3 Health Board Data Protection Manager**

Shall be responsible for ensuring that all the Health Board CCTV schemes are adherent to the Data Protection Act 1998, and the associated Code of Practice. The Data Protection Manager will also be responsible for updating the Health Board on any changes in legislation and for ensuring that the Health Board's registration with the information Commissioner is accurate and up to date.

### **7.4 Security Staff**

Security staff will ensure adherence to this Code of Practice. All staff involved in the handling of the CCTV equipment, both directly employed and contracted, will be made aware of the sensitivity of handling CCTV images and recordings. Staff will be fully briefed in respect of all functions, both operational and administrative relating to CCTV control operations.

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## 8. Management of CCTV Schemes

No part of the CCTV system should be initiated, installed, moved or replaced without prior approval by the Head Security Services Management Team, to approve such schemes; it must also comply with the General Data Protection Regulation.

All schemes are required to meet all the following standards and must be formally approved (as above) prior to installation;

- Establish who the person(s) legally responsible for the proposed scheme within the Health Board.
- Assess the appropriateness of the reasons for, using CCTV or similar surveillance equipment.
- Document this assessment process and the reasons for the installation of the scheme.
- Establish and document in accordance with current legislation the purpose of the scheme.
- Ensure the notification lodged with the Office of the Information Commissioner covers the purposes for which this equipment will be used.
- Establish and document the person(s) or organisation(s) that are responsible for ensuring the day-to-day compliance with the operational requirements of such scheme and this policy.

This must be done jointly by the Security Manager and the Data Protection Manager.

All CCTV equipment should be purchased and installed in conjunction with the Health, Safety and Security Services Department and Shared Service Procurement Department. If a member of staff wants to implement a new CCTV system they should contact the Health Boards Security Manager.

## 9. Digital CCTV

- All digital CCTV systems installed onto the Health Board premises must have the storage capacity to hold a minimum of 31-day footage. In certain circumstances it may be considered appropriate to retain data for a longer period, a full risk assessment must be taken before making a decision for a longer retention period.
- If police require access to CCTV footage an area should be made available for viewing. This area is designated as the Security Control Room at the University Hospital of Wales. A trained member of staff to be available at all times to ensure timely downloading to ensure the prompt investigation of incidents.

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- If the police require a copy of the footage, two copies must be made. One copy to be retained by the Health Board and the other given to the police. The event will be noted in the security log and details and signature of the recipient obtained.
- All statements within the policy apply to the use of digital CCTV including guidance outlined above. If the police request access, above guidance must be adhered to, in addition to the section on access to digital images.

## 10. Recording

Systems are supported by the hard drive recording facilities which will function as appropriate. In addition incidents can be recorded in real time when necessary.

In the event of the recorded footage being required for evidence, it will be retained for a period recommended by the Health Boards Legal department and/or the police. It will be separately indexed and securely stored in the Security Managers safe to avoid accidental re-use.

All footage that has been retained to record information remains confidential and copyright at all times and remains the property of Cardiff and Vale University Health Board.

## 11. Positioning of Camera and Signs

The location of the equipment must be carefully considered, the following points must be taken into consideration before installing either a new CCTV camera or a full CCTV system.

- Equipment should be situated so they can monitor the area that is intended to be monitored.
- Equipment should be situated so they can only monitor the predefined purpose.
- Cameras cannot be positioned in areas where it would be considered private e.g. toilet, changing room, private office. (There maybe exceptions to this in cases of suspicion of serious crime whereby there is police involvement).
- If the CCTV area borders private property every effort should be made to ensure the private area cannot be viewed.
- Signs that CCTV cameras operating shall be displayed at the perimeter of the area covered by the scheme and at other key points.
- The signs shall inform the public that cameras are in operation and allow people entering the hospital to make a reasonable approximation of the area covered by the scheme.

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- Signs should identify the Cardiff and Vales University Health Board and give an official address.
- Any system implemented must be periodically reviewed to maintain its effectiveness and to ensure blind spots are eliminated where possible; more importantly areas covered remain a priority and that any new emerging hot spots are taken into consideration. Health and Safety policies should assist in this process. Consider implementing a system which factors in flexibility to tackle emerging risks at a later date?

## 12. Administration and Procedure

A log will be maintained with the control room/viewing area and kept secure. Brief details of incidents will be noted together with any consequential action taken.

It is recognised that the images obtained are sensitive and subject to General Data Protection Regulation. All DVDs, digital images and copies will be handled in accordance with working procedures, which are designed to ensure the integrity of the system. A DVD log will be kept on-site for the purposes of recording the use of DVDs, their use and retention for evidential purposes.

Other than authorised staff investigating untoward incidents, digital images will only be viewed at the request of the police or through subject access procedures. Copies of DVDs will only be made for the purposes of crime detection, evidence for prosecutions or where required by law.

## 13. Camera Control

On each occasion an incident is recorded, a report setting out the time, date and detail of the incident will be submitted by the relevant CCTV operator to the Security Manager.

Adjustment and alteration to siting or use of cameras should be made by staff that has the appropriate authority. Data protection principles should be considered during this process.

DVD handling procedures are in place to ensure the integrity of the image information held.

## 14. The Control Room/Viewing Area

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Images captured by the systems will be monitored on-site, in the Security Control Room. Unauthorised personnel or visitors should not be able to see the monitors.

Access to view monitors or DVD and digital images activity will only be granted to persons with a legitimate reason or those who have followed the subject access procedures. Identify and authorisation will have been presented and validated to the responsible officer. Visitors will be required to complete and sign an access log. Details recorded will include name, department or organisation, the person who granted the access, time of entry and exit, and the DVD or digital image referenced and extracts viewed.

Criteria for the viewing of the hard drive non-security related personnel;

At the discretion of the Security Manager, Data Protection Manager or on-call Site Manager out of hours. Individuals may be allowed to view the Hard Drive in the viewing area:-

- If they are investigating an untoward incident.
- In the case of a missing patient.
- To identify persons relating to an incident.

Areas which would normally result in permission for access to the viewing area being refused include:

- Where a person wishing to view has no connection with the incident or has no management role relating to the incident.
- Where viewing is purely salacious.
- Where the performance of a member of staff not relating to crime, fraud or the investigation of untoward incidents is involved.
- For occurrences that relate to damage to private property for which the Health Board has no responsibility.

Access to view the monitors, within the security control room whether to operate the equipment or to view the images is restricted to staff with that responsibility.

The daily log book shall record staff on duty each shift, and the names of any person groups that have been authorised by the individual with day to day responsibility for the scheme to have access to the control room and/or view the monitors.

A responsible operator shall be present during the operation of the monitors. If monitors are to be left unattended, the area in which they are kept shall be secured against unauthorised entry.

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Public access to or the demonstration of monitors shall not be allowed except for lawful, proper and sufficient reason, and after informing the Security Manager.

Arrangements for the control room shall include the following requirements to ensure that the control room is secure at all times:

- Routines and procedure and any other facilities necessary to ensure that the control room is protected from unauthorised access.
- Records are kept of all access to the control room including operation and duty, recording details of the individual concerned, and times of arrival and departure.
- Operation times and numbers of staff on shift are clearly defined and complied with.
- Access to the control room is restricted to operating staff and their managers according to prearranged shifts and on production of valid identification.
- Technical repairs and cleaning and similar activities should be carried out in controlled circumstances.
- Access by visitors shall be carefully defined and be the responsibility of the Health Board.
- Any manager outside of direct responsibility to the operation of the control room who requests to view recorded images for any other purpose than that for which the scheme was designated must be directed to the Security Manager. If this occurs out of normal working hours, access to view should politely be denied or the request shall be redirected to the Senior Manager on duty who must consult with and adhere to this policy.

## **15. Disposal of images**

At the end of their useful life, all DVDs will have their images magnetically erased and disposed of as confidential waste and spot checked for erasure prior to being destroyed or disposed of. Confidential waste should be shredded or placed in the appropriate bag for disposal and the appropriate serves to collect the confidential waste.

## **16. Quality of Images**

It is important the images produced by the equipment are as clear as possible in order that they are effective for the purpose(s) for which they are intended. Upon installation, an initial check should be undertaken to ensure that the equipment performs properly.

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The medium on which the images have been recorded should not be used when it has become apparent that the quality of images has deteriorated.

If the system records features such as the location of the camera and/or the date and time reference, these should be accurate. When installing cameras, consideration must be given to the physical conditions in which the cameras are located e.g. infrared equipment may need to be installed in poorly lit areas.

Cameras should be properly maintained and serviced to ensure that clear images are recorded. They should be protected from vandalism in order to ensure that they remain in working order. If a camera is damaged, there should be clear procedures for defining the person responsible for making arrangements for ensuring the camera is fixed within a specific time. The quality of the maintenance work should be monitored and checked before being permanently sited to eradicate obstacles which may affect its view

## **17. Breaches of the Policy**

The Health Board reserves the right to take disciplinary action against any employee who breaches this policy in accordance with the Health Boards Disciplinary procedures.

As a major purpose of these schemes is assisting to safeguard the health and safety of staff, patients and visitors, it should be noted that intentional or reckless interference with any part of the monitoring equipment, including cameras/monitors/back up media, may be a criminal offence and will be regarded as a serious breach of Health Board Policy. Where a serious breach occurs, the Health Board must appoint a Senior Manager independent of the operation of the scheme to investigate the breach with advice from the Security Management, make recommendations to the Health Board on how the Breach can be remedied.

## **18. Complaints Procedure**

Complaints regarding the operation of the Health Boards CCTV system must be progressed through the Health Boards Concerns Department.

## **19. Monitoring Compliance**

Compliance is monitored in the following ways:




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- Police architectural/liasion Officer will conduct a review of the CCTV system to ensure that it meets the data protection requirements on a bi annual basis and report findings to the Security Manager.
- The Security Manager and Data Protection Manager will, together, on an annual basis, conduct a site inspection of the CCTV signage, camera locations and an inspection of the DVD log to ensure compliance with the policy and General Data Protection Regulation. The results will be assessed by the Security Manager. Any areas of non-compliance or concern will be submitted to the information governance group, as part of the annual information governance report.

## **20. Procedure Review and Awareness**

Following ratification, this Procedure will be reviewed every three years by the Health Boards Security Manager and Data Protection Manager.

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<b>Application to Access CCTV Images</b>			
		<b>Data Protection Declaration</b> Bwrdd Iechyd Prifysgol Caerdydd a'r Fro Cardiff and Vale University Health Board	
<b>Application to access CCTV images under the General Data Protection Regulation</b>		I declare that the information given is correct to the best of my knowledge and that I am entitled to apply for access to CCTV Image Records referred to above under the terms of the Data Protection Act 1998	
Surname		Please place a tick in the appropriate box below	
Forename(s)		1.	<input type="checkbox"/> I am the applicant
Address		2.	<input type="checkbox"/> I have been asked to act by the applicant and attach their written consent
Post Code			
Date of Birth	/ /	3.	<input type="checkbox"/> I am acting on behalf of the applicant who lacks capacity to consent
		4.	<input type="checkbox"/> I have Legal Rights to conduct affairs on behalf of the Patient (evidence must be provided)
<b>DETAILS</b>			
		NAME	
Date of recording	/ /	Approx Time	SIGNATURE OF APPLICANT

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Location			<b>TO BE COMPLETED BY INDEPENDENT WITNESS</b>
Please circle appropriate response below			
I require access only to the recorded image	Yes	No	I have known the applicant for ..... years as an employee/client/patient/personal friend *and have witnessed the applicant signing this form
I require a copy of the recorded image	Yes	No	<b>*Delete as appropriate</b>
			NAME
			ADDRESS
			SIGNATURE

Application to Access CCTV Images	
<b>Office use only</b>	
Scheme Operator (Name)	
Access provided on date	
Proof of Identity (type)	

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Further Action	
Applicant notified outcome	YES/NO
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## **Cardiff and Vale University Health Board**

### **Body Worn CCTV System for Security Officers**

#### **Introduction**

Body Worn Video (BWV) is an overt method by which staff can obtain and secure evidence at incidents. This document is intended to enable staff to comply with legislation and guidance to create evidence suitable for use ultimately in court proceedings if required. In addition to providing compelling supportive evidence for court it has been found that BWV can furnish other benefits such as;

- ☐ Raise standards of service.
- ☐ Reduce incident escalation.
- ☐ Augment opportunities for evidence capture.
- ☐ Reduce complaints.

BWV equipment provided for users should be compliant with the recommendations in the 'Technical specifications' section of the Guidance for the Police use of Body-Worn Video Devices published July 2007 by the Police and Crime Standards Directorate (<http://library.college.police.uk/docs/homeoffice/guidance-body-worn-devices.pdf>).

This document explains the process by which Cardiff and Vale University Health Board will utilise BWV devices. It will ensure a consistent and effective system is adopted throughout the organisation, benefiting both members of the public and staff.

BWV devices will be used by staff. It has the potential to significantly prevent, stop escalation, and record events involving conflict. In cases which involve legal redress it can improve the quality of evidence provided by members of the organisation. It will also raise standards of service providing a good reference for staff development.

BWV can be used across a wide range of operations and in all cases users and supervisors must use professional judgment with regard to the use of this equipment.

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There are some examples of situations where the use of BWV is not appropriate; the following list is for guidance only and is not exhaustive.

- ❑ Legal privilege – users must be careful to respect legal privilege and must not record material that is, or is likely to be, subject to such protections.
- ❑ Private dwellings – users must consider the right to private and family life (Article 8 of the ECHR) and must not record beyond what is necessary for the requirements of the individual case.
- ❑ Managers must ensure that the use of the cameras is widely advertised prior to the start programme of ensuring ‘fair processing’ a requirement of the General Data Protection Regulation. At an individual case level the use of BWV must be made clear by staff making a verbal announcement to those persons who may be recorded. In some cases it will not be practical to make such an announcement, on these occasions this announcement must be made as soon as practicable. Staff may also wear a sign/symbol in order to ensure fair processing is achieved in compliance with the Data Protection Act.

BWV cameras might be small, but they are not to be worn or used in a hidden or covert manner ensuring maximum impact on prevention and escalation of an incident.

The decision to record or not to record any incident remains with the user. The user must be mindful that failing to record an incident may require explanation. Therefore, if the user is present at an encounter where BWV can be used the user should record the incident.

Recording should be incident-specific: users should not indiscriminately record entire duties and only use recording to capture video and audio at incidents that would normally require reporting, whether or not these are ultimately required for use in evidence

## **PERSONNEL**

Head of Security is – Damian Winstone

Authorised users of the system are

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- i) Security Team Leaders
- ii) Security Officers
- iii) Other Health Board staff authorised in writing by a member of the Joint Management Team

## GROUNDS FOR RECORDING PERSONAL INFORMATION

The general principle is that the CCTV **must be switched on** when an incident of violence is taking place or where there is an identified risk to a staff member. The CCTV is a visible and overt deterrent to any potentially aggressive person, making a clear statement that their actions will be recorded, and so will the actions of the officer, thereby reducing the scope for false allegations. These issues are particularly relevant to staff working within the Emergency Unit. Cardiff and Vale Health Board shall ensure that the use of the shoulder mounted CCTV system is both proportionate and necessary. As such the following principles underpin its effective and lawful use:

### Practical day-to-day use

- i) That such use is overt and conveyed to such persons whose data maybe captured;
- ii) That such use is displayed in a prominent and visible manner on the Officer's uniform;
- iii) That such use is also conveyed in an audible manner where possible to those whose data maybe captured.

### Subsequent Data Management

- iv) All Team Leaders and Security Officers are trained in data-handling and management to the standard required in this policy;
- v) That the necessary equipment and infrastructure for effective data management and handling is in place and installed at all times.

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## OPERATING PROTOCOL

CCTV hardware will be signed out by the Team Leader daily  
Team Leaders, Security Officers using the equipment will displayed this badge

- Once a recording has been made it MUST be retained and downloaded prior to finishing duty.
- Customers should be informed verbally that a recording is taking place stating CEO number and the reason for the recording i.e. “Under Section 29 – Crime and Taxation of the Data Protection Act”
- All recordings will be stored in an access controlled area of the system with access limited to the Parking and Traffic Management Team Leader, Parking Supervisor (Enforcement) and the IRMO
- No CCTV recordings or images should be tampered with as this could lead to disciplinary action. Please note that the system provides a good evidential trail from recording to deletion.

## Responsibilities

### User

- The User of the BWV will have received basic instruction in the use and legislation surrounding BWV prior to any use.
- It is the responsibility of the BWV user to ensure that:
- Equipment is checked prior to deployment to ensure it is working correctly.
- That the batteries are charged prior to use (consider taking spare batteries) and immediately recharged on return.
- That the time and date settings are accurate.
- That camera lenses are clean and the picture quality is suitable.
- The camera lens is aimed and focused appropriately to capture evidence.
- Compliance with legislation and guidance.
- View only footage they have a bona-fide reason for viewing.



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Viewing of images shall be limited to:-

- Security Management, Assistant Security Manager, Case Manager, Security Team Leaders and Security Officers
- Police Officers, for operational reasons, as authorised by the Police Duty Officer;
- Any other persons or organisations shall only be allowed to view the system with the authorisation of the Data Protection Manager, Security Team Leader, (out of Hours)
- Images shall be retained for 31 days then automatically deleted unless they form part of an ongoing investigation

## REQUESTS FOR INFORMATION

Details of recorded information shall only be released with the permission of the Data Protection Manager.

Requests for information by the Police shall require the authorisation of the Police Duty Officer.

Directed surveillance will be in accordance with section 6 of the CCTV procedure

## LOGS

The Security Team Leader shall be responsible for ensuring that the following records are maintained and audited in accordance with the CCTV Policy

- i) Incident Log;
- ii) Media Copy log
- iii) Viewing Log;
- iv) Video Stills Log;
- v) Signing in and out Log

## How should material be stored?

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**Conclusion:** It is important to manage the material in accordance with DPA legislation. The most efficient method is to use software specific to BWV use.

*“The solution will ideally be computer (PC) based and should allow the user to:*

- download video from the body-worn camera;*
- review video on the system;*
- create master and working copies of evidential material on WORM media; and*
- store non-evidential material for 31 days before deletion.”*