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| **DOCUMENT TITLE:** | **CCTV Protocol** |
| **CATEGORY:** | Governance and Quality |
| **LAST REVISED:** | September 2021 |
| **VERSION:** | V1.2 |
| **DUE FOR REVISION:** | September 2023 |
| **OWNED BY:** | Company Lead |
| **RELATED DOCUMENTS:** | Delphi Information Governance Policy and Privacy Notice |

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| **OUR PRINCIPLES:** | With passion and excellence, Delphi makes adifference to people’s lives by providing innovative and specialist addiction services that lead the way from dependence to freedom. |
| **OUR VALUES:** | We all commit to and care about: going one step further with our clients; our wellbeing as individuals and as teams; and improving and strengthening ourselves and our organisation. |

CCTV Protocol

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| BEFORE |
| Staff understand what Information Governance is, and are supported in their roles | All staff must read the Delphi Information Governance policy and must discuss any questions they have with their manager.All staff must know if CCTV is in operation within their workplace (link Privacy Notice).All staff must ensure they are aware who their IG Lead/Caldicott Guardian and Data Protection Officer is.All staff must work within IG procedures (including the confidentiality code of conduct explained in the IG policy), sign the Calico IT security terms and conditions, and follow best practice standards at all times.Upon joining Delphi Medical, all staff must undertake the corporate induction, which includes IG and GDPR training.All managers must ensure that the staff they manage have completed the above 6 steps before they commence work with data/information.All managers across the company must offer staff/workers regular support in the form of supervision, appraisal, and general support as appropriate.Areas of concern/learning must be discussed in a timely manner and the person supported to improve/develop. |
| Staff have completed IG and GDPR training | Annual IG and GDPR is training is mandatory for all working within the company. |

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|  | Additional training is encouraged. Managers must discuss additional training needs via supervision and ‘My Time’.All staff must undertake record keeping training and understand how to store information correctly.The corporate services must monitor mandatory training, and report compliance to the management team who must exception report to the Senior Leadership Team. |
| Effective systems and processes are in place | The Service Manager must ensure that appropriate, safe, and effective systems are in place to store information in line with the IG Policy and IT Security Policy.The Service Manager and Corporate Services must ensure that effective information processes are in place, in line with insurance requirements.Managers must ensure that staff know what these processes are and how to follow them.The IT Team must implement data and system security measures that meet the requirements of GDPR Regulations as a minimum. |

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| DURING |
| Information processes remain effective and in date. | The Information Governance Lead must ensure that IG policies, protocols, processes, and training, remain up to date and fit for purpose.The Corporate Services team must complete the annual Data Security and Protection Toolkit and share feedback to the IG Lead.Corporate Services, and the Service Managers, must complete regular (announced/unannounced) data audits in line with Delphi’s audit schedule. |

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|  | The outcome of audits must be discussed at supervision, team, and management meetings. This will be checked by the Senior Leadership Team.Lessons learnt and best practice must be discussed at the monthly managers meeting and cascaded to all staff via the team meeting.Individual staff improvements required are to be managed via supervision and the Performance Policy where appropriate.Ideas for improvements, innovative practices should be consistently encouraged by managers.Operational changes will be discussed and agreed at the monthly Managers Meeting and cascaded to all staff via the team meeting. |
| IG questions and concerns should be escalated appropriately | All IG concerns must be discussed with the Service Manager, and/or the Caldicott Guardian where necessary.Emma Thornber (Caldicott Guardian) Mobile: 07583511844Ethornber@delphimedical.co.ukLyndsey Evans (Pavilion) Mobile: 07590472488LEvans@delphimedical.co.ukKate Cookson (HMP Garth and HMP Wymott) Phone: 01772 443585 / 01772 442197KCookson@delphimedical.co.ukJoanna Clarke (HMP Manchester) Mobile: 07821302006JClarke@delphimedical.co.ukKaren Mottram (Horizon) Mobile: 07583374079KMottram@delphimedical.co.uk |



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|  | Adele Willis (Corporate Services) Phone: 01253 205158AWillis@delphimedical.co.ukGary Howarth (Blackburn with Darwen) Phone: 01254 495014GHowarth@delphimedical.co.uk |
| All of the data we collect and process is recorded, and all data is collected, stored, and processed in accordance with the law. | The IG Lead must review the GDPR compliance plan at least annually to ensure that all data is collected and processed in accordance with the law.Service Managers must review the GDPR compliance plan at least annually to ensure that all data we collect and process is included on the plan.The IG Lead should ensure that a Privacy Notice is in place at all times, in accordance with GDPR Regulations.Reasonable efforts must be made to ensure that areas outside of the Medication rooms are not recorded by CCTV.Signs must be erected to inform individuals that they are in an area within which CCTV is in operation.The viewing of live CCTV and recorded stored images must be restricted to members of staff within Delphi Medical Ltd with explicit authority to view images, for the reasons set out above.No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this protocol as to disclosure of images.The Service Manager is responsible for checking the CCTV is working in accordance with the IG Policy on a weekly basis.Recorded images should be stored in line with the IG Policy and GDPR compliance plan. |



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|  | A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, must be recorded by the Service Manager.All information requests and breaches should follow the Information Governance policy and protocol and be logged from the beginning of the process by Corporate Services.If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request.If the footage contains images of other individuals, then it must be considered whether:* The request requires the disclosure of the images of individuals other than the requester
* The other individuals in the footage have

consented to the disclosure of the images* If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

Any member of staff who breaches this protocol may be subject to disciplinary action. The misuse of CCTV could constitute a criminal offence. |

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| AFTER |
| All personal data recordings are effectively safeguarded. |
| Information handling is in line with all legislation and guidance. |
| Data breaches are kept to a minimum. |

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| Staff are supported to handle data correctly. |