



Gwasanaeth Cefnogi
Swyddog Diogelu Data
Data Protection Officer
Support Service

IGDC • DHCW

Video Surveillance Policy

Approved by: Mr Alex Davies

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1.0 Document History

1.1 Revision History

Date	Version	Author	Revision Summary
12/03/2026	2026.2.0	Mr Alex Davies	This policy has been based upon Version 2.0 of the DPO Support Service Template

1.2 Reviewers

This document requires the following reviews:

Date	Version	Name	Position

1.3 Authorisation

Signing of this document indicates acceptance of its contents.

Approver's Name:	Caldicott Guardian
Role:	GP Partner
Signature:	 <hr/> <p>Dr Maria Vincent GP Partner Caldicott Guardian 12/03/2026</p>



2.0 Introduction

This Policy has been developed to set out the appropriate actions and procedures which must be followed to comply with the Data Protection Act (DPA) 2018, UK General Data Protection Regulation (UK GDPR) and codes of practice in respect of the use of video surveillance used by The Vale Of Neath Practice.

Video surveillance can be categorised based on various factors, the main categories include:

- Closed-Circuit Television (CCTV)
- Automatic Number Plate Recognition (ANPR)
- Body Worn Video (BWV)
- Unmanned Aerial Systems (UAS)/Drones
- Facial Recognition technologies and surveillance
- Smart Doorbells (commercial use)
- Surveillance in vehicles
- Action cameras and other portable surveillance

For the purpose of this policy The Vale Of Neath Practice conducts the following type(s) of video surveillance –

- To detect, prevent or reduce the incidence of crime and support the apprehension and prosecution of offenders.
- To prevent and respond effectively to all forms of harassment and disorder on Practice property.
- To reduce the fear of crime.
- To create a safer staff and patient community and environment.
- To gather evidence by a fair and accountable method.
- To provide emergency services assistance.
- To assist with Health and Safety.
- To support insurance claims.
- To protect the physical environment.
- To investigate complaints and disciplinary issues, only as part of a formal complaint investigation.

The Vale Of Neath Practice is committed to providing a safe and secure environment for all staff, users and visitors to its premises, this includes the protection of medical equipment and assets that all contribute to healthcare delivery. Video surveillance will be used to record events, where recording is lawful and available, thereby protecting the organisation's assets, preventing and detecting crime, securing the successful prosecution of offenders, and reducing the fear of crime whilst enhancing patient, staff and visitor safety. At all times The Vale Of Neath Practice staff will ensure compliance to relevant legislation and this policy.

3.0 Scope

This policy applies to all staff of The Vale Of Neath Practice



The term 'staff' includes all health professionals, partners, staff members, locums, students, trainees, secondees, volunteers, contracted third parties and any persons undertaking duties on behalf of The Vale Of Neath Practice

This policy should be read in conjunction and reviewed in-line with the following:

VON Information Governance

VON Video Surveillance

VON Information Security

VON Individual Rights Procedure

Breaches of this policy will be reported via the organisation's incident reporting processes and dealt with in line with the organisation's Disciplinary Policy where appropriate.

4.0 Policy Objectives

The aim of this policy is to formulate legislation compliance, consistent working practices in relation to the use of any form of video surveillance used on The Vale Of Neath Practice premises. These practices will ensure the security of personal data held by The Vale Of Neath Practice whilst allowing the appropriate level of access to material when requested by individuals or other agencies.

The effectiveness of any form of video surveillance used by The Vale Of Neath Practice will also be improved utilising its ability to prevent and detect crime, reduce the fear of crime and thereby enhance staff, patient and visitor safety. Retention of copied images is also covered in the Policy together with monthly/annual reviews to consider and lawfully justify the installation and continued use of any form of video surveillance.

The main objective of this policy is to allow, where practicable, data to be recorded, stored securely, reviewed, copied and disclosed in compliance with data protection legislation. The accurate recording of all relevant information will also improve the integrity of The Vale Of Neath Practice systems. This will allow robust, lawful, compliant procedures should future reviews or audits be carried out.

5.0 Roles and Responsibilities

5.1 Senior Responsible Person

The Senior Responsible Person within the organisation is responsible for ensuring the highest level of organisational commitment to this policy and the availability of resources to support its implementation. Where appropriate, the Senior Responsible Person may delegate specific responsibilities to other individuals who have responsibility for information governance within the organisation.

The Senior Responsible Person will ensure that all staff are aware of this policy, understand their responsibilities in complying with the requirements of this policy and are up to date with mandatory information governance training.



Additionally, the Senior Responsible Person will ensure the key roles outlined below are established within the organisation's management structure.

The Senior Responsible Person within The Vale Of Neath Practice is Caldicott Guardian.

5.2 Information Governance Lead

The Information Governance (IG) Lead is responsible for liaising with and supporting the Data Protection Officer and Caldicott Guardian in coordinating and implementing the confidentiality and data protection work programme within the organisation.

Where necessary, the IG Lead will supervise and direct the work of others to aid the organisation in meeting its information governance responsibilities.

The IG Lead will act as the first point of contact for information governance queries within the organisation.

The Information Governance Lead within The Vale Of Neath Practice is Caldicott Guardian.

5.3 Data Protection Officer

The Data Protection Officer (DPO) provides independent risk-based advice to support the organisation in its decision making in the appropriateness of processing personal and special categories of data within the Principles and Data Subject Rights laid down in the UK General Data Protection Regulation (UK GDPR).

The DPO role is to 'inform and advise' and not 'to do', they are a trusted advisor whom the organisation should actively seek advice from.

The Data Protection Officer for The Vale Of Neath Practice is the Digital Health and Care Wales (DHCW) Data Protection Officer Support Service.

The DPO can be contacted by emailing DP0Service@wales.nhs.uk

5.4 Caldicott Guardian

The Caldicott Guardian has responsibility for ensuring that patient information is used legally, ethically, and appropriately, and that confidentiality is always maintained. Caldicott Guardians should be able to provide leadership and informed guidance on complex matters involving confidentiality and information sharing.

The Caldicott Guardian will apply the eight principles and act as "the conscience of the organisation" regarding information sharing.

The Caldicott Guardian within The Vale Of Neath Practice is Dr Maria Vincent.

5.5 All Staff



All staff have a responsibility for information governance and maintaining appropriate security for their own work area.

All staff must familiarise themselves with the policy content and ensure the policy requirements are implemented and followed within their own work area. Mandatory information governance training must be undertaken at least every two years.

5.6 All Operators and Users of Video Surveillance Systems

All staff with allocated responsibility for everyday operation and use of video surveillance must ensure that all data/images are handled securely and responsibly within the aims of the policy. All staff with allocated responsibility video surveillance must be adequately trained on the use and operation of the system, including access to and disclosure of images.

The nominated individual(s) with responsibility for the operation of all video surveillance systems used for The Vale Of Neath Practice is The Practice Manager.

6.0 Legislation

6.1 Surveillance Camera Code of Practice 2013

In addition to the principles outlined in the [UK GDPR](#) and [DPA 2018](#), organisations in use of video surveillance are also obligated to comply with the [UK Government's Surveillance Camera Code of Practice 2013](#).

The code details 12 guiding principles which strike a balance between protecting the public and upholding civil liberties.

These are:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency regarding the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules regarding who can gain access and for what purpose such access is granted. The



disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.

8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are compiled within the organisation with regular reports being published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

7.0 Policy Framework

7.1 Informing the public of the use of video surveillance

Staff, patients, service users and visitors should be made aware whenever they are being monitored by a surveillance camera system, who is undertaking the activity and the purpose for which the associated information is to be used. In addition, clear signs should also include a named individual who can be contacted in the event of any further information in relation to video surveillance is required.

In accordance with Article 13 of the UK GDPR, it is important to ensure that the areas of surveillance are identified. Signs must be placed prominently before the entrance to the system's field of vision and reinforced with further signs within the area. They should be positioned at a reasonable distance from the places monitored and in such a way that individuals can easily recognise the circumstances of the surveillance before entering the monitored area. The Vale Of Neath Practice is responsible for providing such notices and ensuring these are displayed on site and throughout the premises where required.

7.2 Data Protection Impact Assessment (DPIA)

In the development or review of any surveillance camera system, consideration will always be given to whether there is a legitimate aim and a pressing need. In addition, this will also identify any concerns to strike the most appropriate balance between public protection and individual privacy.

Under Article 30 of the UK GDPR, organisations are required to maintain a record of the processing activities taking place. This applies to both controllers and processors using surveillance systems. The records The Vale Of Neath Practice keep will cover the purpose(s) for the lawful use of surveillance, any data sharing agreements that are in place and the retention periods of any personal data.

As required by Article 35 of the UK GDPR, The Vale Of Neath Practice will complete a Data Protection Impact Assessment (DPIA) for any processing that is likely to result in a high risk to individuals, including its use of surveillance systems.



The DPIA will assess whether the use of surveillance is appropriate in the circumstances. Any additional functionality beyond image capture will be explicitly assessed within the DPIA. As part of the assessment, the organisation will consider the reasonable expectations of the individuals whose personal data is processed and the potential impact on their rights and freedoms. The Vale Of Neath Practice will record its considerations and mitigations in the DPIA prior to the deployment of a surveillance system that is likely to result in a high risk to individuals.

If high risks cannot be mitigated, prior consultation with the Information Commissioners Office (ICO) is required and the organisation will not proceed with the processing until guidance has been received from the ICO.

7.2 Positioning / Review of the Cameras

It is essential that the purpose and location of the equipment be carefully considered, to not unnecessarily invade the privacy/activity of persons inside/outside the perimeter of The Vale Of Neath Practice. This will also ensure that the way in which images are captured complies with the UK GDPR, Data Protection Act 2018, Human Rights Act 1998 and the Surveillance Camera Code of Practice 2013.

All cameras will be located in prominent positions within public and staff view as to not infringe on clinical / treatment areas.

7.3 Quality of Images

It is important that 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. This is why it is essential that the purpose of video surveillance use is clearly identified. For example, if a system has been installed to prevent and detect crime, then it is essential that the images are adequate for that purpose.

Approved security companies should undertake all camera installations and service contracts. Upon installation, all equipment is tested and The Vale Of Neath Practice will ensure only the designated areas are monitored, and high-quality pictures are available in live and play back mode.

All video surveillance and equipment will be serviced and maintained on a regular basis. The Practice Manager will be responsible for conducting checks on the system(s) to ensure it is working properly and remains fit for purpose weekly.

7.4 Processing and Retention of Images

The retention period for different video surveillance systems will vary according to the purpose for the system and how long images and other information need to be retained in relation to serving its intended purpose.

Principle 6 of the [Surveillance Camera Code of Practice](#) states that images and information obtained from a surveillance camera system should not be retained for longer than necessary to fulfil the purpose for which they were obtained in the first place. The retention period for different video surveillance systems will vary due to the purpose for the system and how long images and other



information need to be retained to serve its intended purpose. It is not, therefore, possible to be prescriptive about maximum or minimum periods.

Images and other information must not be kept for longer than necessary to meet the purposes for recording them. However, on occasions, The Vale Of Neath Practice may need to retain images for a longer period for example where a law enforcement body is investigating a crime to give them the opportunity to view the images as part of an active investigation.

All images viewed in playback mode shall be recorded on the appropriate record sheet and a further record made if data is copied. (See [Appendix A](#)). On no account is there to be unrecorded viewing of recorded data unless in the event of an emergency to prevent loss of life, serious harm or loss.

While images are retained, it is essential that their integrity be maintained, whether it is to ensure their evidential value or to protect the rights of people whose images may have been recorded. Access to and security of the images will be controlled in accordance with the requirements of the Data Protection Act 2018 and UK GDPR. No images should be retained longer than is needed, with steps made to ensure the data is recorded of being disposed and ensuring that no breaches or use of the images can occur from this point.

7.5 Access to and Disclosure of Images to Individuals and Third Parties

Access to video surveillance images is only permitted to authorised individuals who have a legitimate business need (e.g. in response to a Subject Access Request/Freedom of Information Request/for the prevention and detection of crime to support ongoing police investigation).

Access is maintained and regularly reviewed by recording staff member's access to each video surveillance system(s) by updating the The Vale Of Neath Practice 's register of users. In addition, where access is revoked or there is any change to staff roles which may impact their need for access, this is dealt with and managed in line with the starters/leavers/mover's process.

7.5.1 Requests and disclosures to individuals (data subject)

Principle 7 of the [Surveillance Camera Code of Practice](#) advises that access to retained images is restricted. Viewing and access to images held at, The Vale Of Neath Practice is controlled by the Information Governance Lead or a person nominated to act on their behalf.

There may be, on occasion, requests by data subjects (individuals) to access images and information that are held about them. In accordance with the UK GDPR, all data subjects have a right to access their data and any supplementary information held by The Vale Of Neath Practice.

Data subjects have a right to receive:

- Confirmation that their data is being processed
- Access to their personal data
- Access to any other supplementary information held about them

When a request to access images and information is received The Vale Of Neath Practice will process the request in accordance with the organisation's Individual Rights Procedure. To note, providing an individual with a transcript of the visual information contained in the video recording is not enough to



comply with a request to access in most circumstances. Any requests for copies or for the viewing images, Form A should be completed for recording purposes (see [Appendix A](#)).

Whilst an unusual route to obtain video images, information requests may also be made under the [Freedom of Information Act 2000](#). Any FOI requests received will be processed in line with the organisation's Freedom of Information Procedure.

7.5.2 Requests and disclosures to third parties

Requests may be received from third parties to access images and information. Such instances may include requests from solicitors to support either a claimant or defendant where a crime has been alleged or, for example, a person's property has been damaged within the car park.

The Vale Of Neath Practice must be able to satisfy themselves that the person requesting the data has the authority of the data subject. The responsibility for providing the required authority rests with the third party and is usually in the form of a written statement or consent form, signed by the data subject. It should be noted that such requests for images or information should be approached with care and in accordance with data protection legislation, as a wide disclosure may be an unfair intrusion into the privacy of other individuals captured within the recordings. Such considerations to protecting the privacy of others should be reviewed in the The Vale Of Neath Practice's Individual Rights procedure.

Third party requests could also include requests from the police. Any requests from the police for access or disclosure of images is permitted only if it supports the purpose of the investigation and must be received in writing, signed and assessed prior to any images being reviewed copied or released.

Images will only be reviewed or disclosed upon receipt of a correctly completed authority which will be countersigned by an officer not below the rank of Inspector.

Where the purpose of the surveillance system is for the prevention and detection of crime The Vale Of Neath Practice may also make a voluntary disclosure of images to the police, where The Vale Of Neath Practice are reporting an incident to the police for investigation.

7.6 Enforcement

The Information Commissioner has the power to issue Enforcement Notices and proceedings against individuals or The Vale Of Neath Practice where they consider that there has been a breach of one or more of the UK General Data Protection Regulation principles or Video Surveillance Code of Practice. An Enforcement Notice would set out the remedial action that the Commissioner requires of any organisation to ensure future compliance with the requirements of the Act together with consideration of prosecution and financial penalties.

7.7 Disposal of images and information

As stated in [Section 7.4](#), the images and information are stored for the minimum time period necessary to fulfil the purpose and therefore, The Vale Of Neath Practice will routinely deleted within 14-30 days.



The deletion (over writing) process is automatically undertaken.

8.0 Training and Support

All staff will receive awareness of this policy through their induction and mandatory training updates. This policy will be available to view [Privacy Notices and other data - Vale of Neath Practice](#).

Should anyone require support, advice or guidance on any element outlines in this policy they should speak to The Practice Manager.

9.0 Review

This policy will be reviewed every 12 months or more frequently where the contents are affected by major internal or external changes such as:

- Changes in legislation;
- Organisation change or change in system/technology; or
- Changing methodology.



Appendix A – Access to View/Copy Images (Internal Use)

REQUEST TO VIEW OR COPY IMAGES (INTERNAL)

Name of the person making the Request:	
Department: Position:	
Address:	
Telephone Number:	

DETAILS OF IMAGES TO BE VIEWED

Date:			
Reason:			
Signed:		Dated:	
Request Approved:		Request Denied (please provide reason)	

TO BE COMPLETED IF IMAGES ARE REMOVED

Ref No:			
Issued to:			
Authorised by:			
Date Issued:			
Issued by:			
Return Date:			
I acknowledge receipt of the above CD / Data Medium:			
Signed:		Date:	

