



Peninsula Dental Social Enterprise (PDSE)

Closed Circuit Television (CCTV) Policy

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Policy will be updated as required in response to a change in national policy or evidence-based guideline.

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Closed Circuit Television (CCTV) Policy

1. Introduction

1.1. Peninsula Dental Social Enterprise (PDSE) uses CCTV for the purposes of the prevention and detection of crime, to ensure staff, student, and patient safety and, where required, to recognise and identify individuals with a view to taking appropriate action where necessary.

1.2. This document sets out the accepted use and management of CCTV equipment and images to ensure that the PDSE complies with the Data Protection Act 2018 and other relevant legislation. We process personal data in line with our Data Protection Policy and are cognisant of the [Amended Surveillance Camera Code of Practice](#)

1.3. This policy and procedure apply to following PDSE run premises:

- Devonport Dental Education Facility
- Derriford Dental Educational Facility
- Exeter Dental Educational Facility

2. Scope and Purpose

2.1. A varying number of cameras have been installed across the three sites where PDSE manages, and controls CCTV. Cameras are situated externally, around the perimeter of buildings, including entrances, car park, barrier control and loading bays (where applicable). Internally, cameras cover patient waiting areas, reception, lobbies, and lifts (where applicable). See appendix 1 for camera sittings.

2.2. The purpose of the CCTV is to assist in deterring, preventing, and detecting criminal activity and antisocial behaviour. The system is also intended to assist with the identification, apprehension and prosecution of offenders, and the identification of actions that might result in disciplinary action. The existence and position of CCTV will help to deter any unauthorised access to PDSE premises and, in the event of an incident, help to identify individuals involved.

2.3. The purpose of this policy is to set out the layout of CCTV on PDSE premises, how it will be used and managed.

3. Roles and Responsibilities

3.1. The PDSE Facilities & Maintenance Manager has overall responsibility for ensuring that the system is maintained and fit for purpose. This includes liaising with contractors for required remedial works, as well as routinely recording inspections of the system to ensure that:

- All cameras are functioning adequately,
- The image quality is satisfactory,
- The fixings of the cameras are secure,
- Appropriate CCTV signage is in place,
- The imagery is being appropriately and securely stored in line with retention periods.

3.2. The Maintenance and IT Team have responsibility for ensuring that the equipment and the routinely recorded images have the necessary security.

3.3. Any decisions to amend, increase or alter CCTV cameras or reduce or increase image retention periods must be authorised by the DPO, following the completion of a Data Protection Impact Assessment.

3.4. Notifications and alerts from the CCTV system are automatically sent to pdsefacilities@plymouth.ac.uk and pdseit@plymouth.ac.uk

3.5. The Data Protection Officer for PDSE has overall responsibility for authorising all requests for access to view or disclose CCTV images.

4. Access and Disclosure of Images

4.1. All requests for access to view or disclose images must be authorised by the DPO prior to being granted. All requests will be reviewed in line with this policy and the PDSE Data Protection Policy before a decision on the request is made.

4.2. Members of the Maintenance and IT Team will have access to the recorded images during the maintenance of the systems but will under no circumstances routinely view, disclose or retain copies of the recorded images, without authorisation.

4.3. Requests to view, access or retain CCTV images from external stakeholders e.g. the police, members of the public must be sent via email to pdse-info@plymouth.ac.uk. Requests from internal stakeholders e.g. staff must be sent via email to pdsecentral@plymouth.ac.uk

4.4. PDSE will communicate the decision to authorise or decline the request within 21 days. It is recognised that some requests will require prompt action due to the seriousness of the matter, if so, this should be communicated at the point the request is made.

4.5. Internal requests for access to view and or retain CCTV images may be made by PDSE Managers to assist with the process of incident investigation, as part of a disciplinary investigation or hearing.

5. Storage and Retention of Images

5.1. Images will be stored on the recording equipment which will be securely protected. Images are routinely retained for **30 days** but may be retained longer in the event that they are required as part of an investigation.

5.2. Any image that are retained over the 30-day period must have prior authorisation from the DPO following a Data Protection Impact Assessment and must not be retained for longer than is necessary for the purpose of the investigation.

Appendix 1

Camera Sitings

Devonport DEF	Internal	External
Camera 1	Main entrance lobby	
Camera 2	Patient Entrance and front of reception desk	
Camera 3	Ground floor waiting area	
Camera 4	Ground floor waiting area	
Camera 5	Ground floor toilet in waiting room	
Camera 6	First floor landing and stairwell	
Camera 7	First floor waiting area and lift	
Camera 8	Ground floor waiting area and lift	
Camera 9	First floor waiting area	
Camera 10	First floor – bay 5 walkway	
Camera 1		Main entrance, walkway, pharmacy
Camera 2		Student entrance, yard gate
Camera 3		Service yard, cabin
Camera 4		Rear of building, grass
Camera 5		Side pathway
Camera 6		Side pathway
Camera 7		Footpath into field
Derriford DEF	Internal	External
Camera 1	Main entrance lobby	
Camera 2	Back of reception desk	
Camera 3	Ground floor waiting area	
Camera 4	Ground floor waiting area	
Camera 5	Ground floor waiting area	
Camera 6	Ground floor goods lobby	
Camera 7	Upper ground floor waiting area	
Camera 8	Stairwell, lift area	
Camera 9	Upper ground floor waiting area	
Camera 10	Upper ground floor waiting area	
Camera 11	Patient lift	
Camera 12	Service lift	
Camera 13	Upper ground floor waiting room	
Camera 14	Lower ground floor staff entrance lobby	
Camera 15		Drop off / service entrance
Camera 16		Car park barrier (front facing)

Camera 17		Car park barrier (back facing)
Camera 18		Car park
Camera 19		Walkway towards John Bull Building
Camera 20		Steps towards John Bull Building
Camera 21		Benches outside plant room
Camera 22		Top of walkway looking towards John Bull Building
Camera 23		Top of walkway looking towards the DEF
Camera 24		Outside main reception
Camera 25		Disabled parking bays front of DEF
Camera 26		Lower ground floor plantroom door
Camera 27		Car park
Camera 28		Bike rack
Camera 29		Steps up to bike rack
Camera 30		External walkway around car park / driveway
Camera 31		Car park
Camera 32		External walkway around car park towards John Bull Building
Camera 33		External walkway around car park towards John Bull Building
Camera 34		Bin store
Exeter DEF	Internal	External
Camera 1		Student entrance
Camera 2		Main entrance / car park
Camera 3		Fire exit by student exit
Camera 4		Rear of building grassy area
Camera 5		Bike rack and benches
Camera 6	Ground floor waiting area	
Camera 7		Main car park and pathway
Camera 8		Rear of building
Camera 9		Side of car park
Camera 10	Reception area	
Camera 11	Main entrance	
Camera 12	First floor waiting area	