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Review Date: 01/05/2019	
Which Principles of the NHS Constitution Apply? Please list from principles 1-7 which apply 3,4,5,6,7 Principles	Which Staff Pledges of the NHS Constitution Apply? Please list from staff pledges 1-7 which apply 1, 2, 3, 4, 5, 6, 7 Staff Pledges
Does this document meet the requirements of the Equality Act 2010 in relation to Race, Religion and Belief, Age, Disability, Gender, Sexual Orientation, Gender Identity, Pregnancy & Maternity, Marriage and Civil Partnership, Carers, Human Rights and Social Economic Deprivation discrimination? Yes	
Document for Public Display: Yes	
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BEHAVIOURAL STANDARDS FRAMEWORK

To help create a great place to work and a great place to be cared for, it is essential that our Trust policies, procedures and processes support our values and behaviours. This document, when used effectively, can help promote a workplace culture that values the contribution of everyone, shows support for staff as well as patients, recognises and celebrates the diversity of our staff, shows respect for everyone and ensures all our actions contribute to safe care and a safe working environment - all of which are principles of our Behavioural Standards Framework.

Behavioural Standards Framework – Expectations ‘at a glance’

Introduce yourself with #hello my name is... 	Value the contribution of everyone	Share learning with others
Be friendly and welcoming	Team working across all areas	Recognise diversity and celebrate this
Respect shown to everyone	Seek out and act on feedback	Ensure all our actions contribute to safe care and a safe working environment
Put patients at the centre of all we do	Be open and honest	For those who supervise / manage teams: ensure consistency and fairness in your approach
Show support to both staff and patients	Communicate effectively: listen to others and seek clarity when needed	Be proud of the role you do and how this contributes to patient care

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1. SUMMARY

This document sets out the appropriate actions and procedures, which must be followed to comply with the Data Protection Act¹ in respect of the use of CCTV (closed circuit television) surveillance systems managed by The University Hospitals of Morecambe Bay NHS Foundation Trust (UHMBT).

The Trust has carefully considered the changes and impact of the ICO's new document 'A data protection code of practice for surveillance cameras and personal information Data protection – 2015²' and has effectively reflected this in the following policy

2. PURPOSE

This policy stipulates the mandatory arrangements for the use and the viewing of CCTV images

Implementation of the policy will lead to a:

- Correct usage of CCTV system
- Legal Compliance
- Increased levels of hospital security
- Inter-agency Co-operation and Co-ordination

3. SCOPE

The Target Audience for this policy is all Staff, Patients and Visitors, The Trust has CCTV on all of its sites and therefore the potential for image capturing covers everyone.

4. POLICY

4.1 Duties

4.1.1 Chief Executive Officer

Shall have overall responsibility for the implementation of this policy and shall have overall accountability for the management of health & safety and security and will delegate responsibility to the Security Managing Director to ensure that adequate and appropriate resources are made available to ensure that the security managing director duties are completed as per their role

4.1.2 Associate Director of Estates and Facilities

Shall be responsible for the overall management of the UHMBT CCTV systems and ensuring this policy and the Codes of Practice issued by both the Information Commissioner (IC) and home office is complied with.

4.1.3 Security Managing Director – Director of Governance

Shall be kept aware of changes in CCTV legislation and strategic changes to the CCTV system by the LSMS and will provide assistance and escalation to the board if needed

4.1.4 Local Security Management Specialist

Shall be responsible for supporting and advising the Associate Director of Estates and Facilities on the suitability and justification of CCTV. The LSMS will also update the SMD with any changes to legislation or issues with the CCTV System.

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4.1.5 Information Governance Team (Data Protection Officers)

Shall be responsible for auditing of the Trusts CCTV systems based on the Information Commissioner's Offices Code of Practice² and the Data Protection Act¹. The data protection officer will work with the information asset owner to ensure that the CCTV system is relevant needed and compliant.

4.2 Legislation

In the drawing up policy, due account has been taken of the following:

- The Data Protection Act 2018¹
- Code Of Practice produced by the Information Commissioner 2015²
- The Human Rights Act 1998³
- The Regulation Of Investigatory Powers Act 2000⁴
- Caldicott Report 1997⁵
- The Freedom Of Information Act 2000⁶
- The Private Security Industry Act 2001⁷
- The Protection Of Freedoms Act 2012⁸

The Data Protection Act 1998¹ came into force on the 1st March 2000 and introduces a legal obligation for the processing of images of individuals caught by CCTV cameras.

An important feature of the legislation is the CCTV code of practice which sets out the measures which must be adopted to comply with the Data Protection Act 1998¹. This goes on to set out guidance for the following of good data protection practice.

The code of practice has the dual purpose of assisting operators of CCTV systems to understand their legal obligations while also reassuring the public about the safeguards that should be in place

Some CCTV systems are the responsibility of UHMBT, such as hospitals and health centre buildings. Where this is the landlord's responsibility all staff must abide by their policies and procedures and not follow this document.

4.3 Policy Application

The Chief Executive has the legal responsibility for the UHMBT CCTV systems. However the Estates and Facilities Division has responsibility for the day-to-day compliance with the requirements of the CCTV code of practice.

The purpose of the (UHMBT) CCTV scheme is for the:

- a) Prevention or detection of crime or disorder;
- b) Apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings)
- c) Interest of public and employee Health and Safety;
- d) Protection of public health;
- e) Protection of UHMBT property and assets

Prior to any camera installation the estates and facilities divisional manager will ensure that the installation complies with the data protection act and CCTV codes of practice.

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The trust is justified in using CCTV on its sites in order to strengthen its status as a safe place and in order to deter and detect criminal activity and in the interests of public and employee Health and Safety.

4.3.1 Purchasing CCTV

Any ward or department that wishes to obtain CCTV must put their request into the Local Security Group for the site that the CCTV is needed on. The local group will present this request to the Trust Security Strategy Group who will deny or approve the request.

4.4 Positioning Of The Cameras

It is essential that the location of the equipment be carefully considered, because the way in which images are captured will need to comply with the Data Protection Act¹ further to this there is the privacy and impact assessment that will need to be done as per the Protection of Freedoms Act 2012⁸. All documentation needs to be formalised and processing via the Trusts ICO Registration.

All cameras are located in prominent positions within public and staff view and do not infringe on clinical / treatment areas. All CCTV surveillance is automatically recorded and any breach of these codes of practice will be detected via controlled access to the system and auditing of the system.

Signs are erected on all entrance points to UHMBT premises and throughout the site to ensure staff and visitors are aware they are entering an area that is covered by CCTV surveillance equipment. The signs include details on the purpose, organisation and contact details.

Use of covert CCTV (Directed) surveillance if required must be requested through the Police. If the request through the police is refused then authority can only be given by NHS Protect. This is covered by the Regulation of Investigatory Powers Act 2000 (RIPA)⁴.

4.5 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 the scheme be 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 the purpose of evidential value.

All camera installations and service contracts should be undertaken by The National Approval Council of Security Systems (NACOSS) approved security companies. Upon installation all equipment is tested to ensure that only the designated areas are monitored and high quality pictures are available in live and play back mode.

All CCTV equipment should be serviced and maintained as a minimum on an annual basis however whenever there is a need for maintenance this should be carried out as soon as is practicably possible or when determined by the installers of the systems.

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4.6 Processing Of Images

Images, which are not required for the purpose(s) for which the equipment is being used, should not be retained for longer than is necessary. 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. It is therefore important that access to and security of the images is controlled in accordance with the requirements of the Data Protection Act 1998¹.

Where the images are required for evidential purposes in legal or UHMBT disciplinary proceedings, a CD-r disc recording is made, encryption techniques deployed and placed in a sealed envelope signed and dated and held by the Local Security Management Specialist or by the site patient services manager until completion of the investigation.

Viewing of images is controlled by the Local Security Management Specialist, site patient services manager or a person nominated to act on their behalf (e.g. Investigating Officer, Workforce). Only persons trained in the use and management of images and equipment and authorised by the Local Security Management Specialist or the site patient services manager can access data.

Any exporting of the images stored on the system must happen as efficiently as possible and must cause no interruption to the system.

4.7 Access To And Disclosure Of Images To Third Parties

It is important that access to, and disclosure of, the images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled.

This will ensure that the rights of individuals are preserved, but also to ensure that the continuity of evidence remains intact should the images be required for evidential purposes e.g. a Police enquiry or an investigation being undertaken as part of the UHMBT disciplinary procedure.

Access and disclosure to images is permitted only if it supports the purpose of the investigation. Under these conditions the CCTV images record log and the appropriate view / release form (Appendix 3) must be completed.

4.8 Access To Images By Individuals (Please Use Appendix 3)

Section 7 of the 2018 Data Protection Act¹ gives any individual the right to request access to CCTV images

Individuals who request access to images must be issued an access request form (Appendix 3).

Upon receipt of the completed form, the Local Security Management Specialist or site patient services manager and the UHMBT Information Governance Team will determine whether disclosure is appropriate and whether there is a duty of care to protect the images of any third parties. If the duty of care cannot be discharged then the request can be refused.

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A written response will be made to the individual, giving the decision (and if the request has been refused, giving reasons) within 40 days of receipt of the enquiry.

4.9 Enforcement

The Information Commissioner has the power to issue Enforcement Notices where they consider that there has been a breach of one or more of the Data Protection Principles⁹.

An Enforcement Notice would set out the remedial action that the Commissioner requires of UHMBFT to ensure future compliance with the requirements of the Act.

Any complaints about the CCTV or its usage will go directly to the complaints department as per trust policy. Alternatively the complainant can complain directly to the ICO.

4.10 Stakeholders

The following are key stakeholders in the development and approval of this policy:

- Health And Safety Committee
- Trust Security Strategy Group
- Health And Safety Reps And Champions Group
- Information Governance Reps

4.11 Review Arrangements

Procedural documents will be reviewed by the procedural document owner within 2 years of approval. However, a review earlier than this may be prompted by factors including:

- Legislative or regulatory changes
- Structural or role changes
- Operational or technological changes
- Changes in the evidence-base
- Organisational learning
- Audits and reviews of the effectiveness of the policy

Any renewals of the policy will be made public via the security Annual report to the board; there would also be a communication of any changes Via the trusts website, social media and notice boards on each of the sites.

4.12 Training / Support

Any staff that will be using the CCTV system will receive relevant and specific training through an induction; this will be refreshed on a 3 yearly basis. The training of staff in the usage of the CCTV systems will be based upon the surveillance camera commissioner occupational competency standards.

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5. ATTACHMENTS	
Number	Title
1	Site Camera Location Record – Correct At The Time The Policy Was Written
2	Access To View Copy of Images – Police
3	Request For CCTV Image: Individual Release Form Subject Access Under The Data Protection Act 2018
4	Equality & Diversity Impact Assessment Tool

6. OTHER RELEVANT / ASSOCIATED DOCUMENTS	
Unique Identifier	Title and web links from the document library

7. SUPPORTING REFERENCES / EVIDENCE BASED DOCUMENTS	
References in full	
No	References
1	Great Britain (2018) Data Protection Act 2018. [Online] Available at: https://www.legislation.gov.uk/ukpga/2018/12/contents (accessed 5.9.18)
2	Information Commissioner’s Office (ICO) (2015) In the picture: a data protection code of practice for surveillance cameras and personal information. V1.1. [Online] Available at: https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf (accessed 28.6.16)
3	Great Britain (1998) Human Rights Act 1998. [Online] Available at: http://www.legislation.gov.uk/ukpga/1998/42/contents (accessed 28.6.16)
4	Great Britain (2000) Regulation of Investigatory Powers Act 2000. [Online] Available at: http://www.legislation.gov.uk/ukpga/2000/23/contents (accessed 28.6.16)
5	DoH (1997) The Caldicott Committee. Report on the Review of Patient-Identifiable Information [Online] Available at: http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_4068404.pdf (accessed 28.6.16)
6	Great Britain (2000) Freedom of Information Act 2000. [Online] Available at: http://www.legislation.gov.uk/ukpga/2000/36/contents (accessed 28.6.16)
7	Great Britain (2001) Private Security Industry Act 2001. [Online] Available at: http://www.legislation.gov.uk/ukpga/2001/12/contents (accessed 28.6.16)
8	Great Britain (2012) Protection of Freedoms Act 2012. [Online] Available at: http://www.legislation.gov.uk/ukpga/2012/9/contents/enacted (accessed 28.6.16)
9	Information Commissioner’s Office (ICO) Data protection principles. Available at: https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/ (accessed 28.6.16)
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Security Industry Authority (SIA) SIA Licensing of Local Authority CCTV Operatives. Available at: http://www.sia.homeoffice.gov.uk/Pages/licensing-local-authority-cctv.aspx (accessed 28.6.16)	
Health and Safety Executive (HSE) (1974) Health and Safety at Work etc. Act 1974. [Online] Available at: http://www.hse.gov.uk/legislation/hswa.htm (accessed 28.6.16)	

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8. DEFINITIONS / GLOSSARY OF TERMS	
Abbreviation or Term	Definition
CCTV	Closed Circuit Television
CD-r	Compact Disks – Write
RIPA	The Regulation Of Investigatory Powers Act 2000
TSSG	Trust Security Strategy Group

9. CONSULTATION WITH STAFF AND PATIENTS	
Enter the names and job titles of staff and stakeholders that have contributed to the document	
Name	Job Title
Daniel Willis	Local Security Management Specialist

10. DISTRIBUTION PLAN	
Dissemination lead:	Dan Willis
Previous document already being used?	Yes
If yes, in what format and where?	Policy on the Trust Procedures page
Proposed action to retrieve out-of-date copies of the document:	Library Services will remove this copy of the document.
To be disseminated to:	
Document Library	
Proposed actions to communicate the document contents to staff:	Include in the UHMB Weekly News – New documents uploaded to the Document Library

11. TRAINING		
Is training required to be given due to the introduction of this policy? No		
Action by	Action required	Implementation Date

12. AMENDMENT HISTORY				
Version No.	Date of Issue	Page/Selection Changed	Description of Change	Review Date
1	01/12/2008	From new	New	
2.1	10/06/2013	Full review	Review of document	17/9/2015
3	28/01/2016	Full Review All Relevant Sections	Review of document Updates as per 2014 Codes of Practice issued Information Commissioner (IC)	01/05/2019
3.1	06/10/2017	Page 3	BSF page added	01/05/2019
3.2	05/09/2018	Throughout	Updated reference to Data Protection Act	01/05/2019

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Appendix 1

Site Camera Location Record – Correct At The Time The Policy Was Written

Site	Location	Type
FGH	Main Car Park	INS
FGH	A&E	INS
FGH	Education Car Park	INS
FGH	Pharmacy	INS
FGH	A&E Reception	INS
FGH	A&E waiting area	INS
FGH	A&E waiting area	INS
FGH	A&E Triage	INS
FGH	A&E Rest Room	INS
FGH	A&E Cubicles	INS
FGH	A&E Cubicles	INS
FGH	A&E Cubicles	INS
FGH	A&E Cubicles	INS
FGH	A&E Major Incidents	INS
FGH	A&E resus doors	INS
FGH	A&E Main Ent	INS
FGH	A&E Main Ent	INS
FGH	A&E Toilets	INS
FGH	X Ray reception	INS
FGH	X Ray	INS
FGH	X Ray	INS
FGH	X Ray	INS
FGH	Labour Ward	INS
FGH	Maternity External	INS
FGH	Maternity Internal	INS
FGH	Orthopaedic Waiting	INS
FGH	A&E Link corridor	INS
FGH	Main Entrance External level 4	TYCO
FGH	Main Entrance towards steps	TYCO
FGH	Main Ent Internal	TYCO
FGH	Main Ent towards Pharmacy	TYCO
FGH	Education Centre External	TYCO
FGH	Education Centre Internal	TYCO
FGH	Lecture Theatre External door	TYCO
FGH	Lecture Theatre Internal door	TYCO
FGH	Lecture Theatre corridor	TYCO
FGH	Lonsdale Grill	TYCO
FGH	Salad Bar	TYCO
FGH	Maternity waiting area	TYCO
FGH	Maternity external	TYCO
FGH	Maternity external	TYCO
FGH	Staff car park L3	TYCO
FGH	Staff entrance level 3 external	TYCO
FGH	Stores loading bay	TYCO
FGH	Staff entrance level 3 internal	TYCO
FGH	Level 3 towards staff entrance	TYCO
FGH	Level 3 lift area	TYCO

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FGH
FGH

Level 3 link corridor
ONCOLOGY X4

TYCO
TYCO

Not on the main frame system

FGH Children's ward x 2
FGH SCBU x 1

Royal Lancaster Infirmary Accident & Emergency Dept

1 A/E Reception
2 A/E Waiting Room
3 A/E Waiting Room
4 A/E Ambulance Entrance
5 **12 spare places on DVD Recorder**

Main Doors / Link / Centenary Cycle Shed

1 Centenary main Door in
2 Centenary main door out
3 HSDU door in
4 HSDU door out
5 MU1 Main door in
6 MU1 Main door out
7 MU1 automatic door
8 Automatic door to catering yard
9 Link corridor by drinks machine
10 Link corridor by access to out patients
11 Link corridor looking towards lifts
12 Link Corridor by toilets MU1
13 Bike shed outside Centenary main Entrance
14 1/2 way along Link Corridor

2 Channels on DVD recorder not working

Skylight / WRVS Endoscopy / Number Plate Recognition

1 Inside Skylight looking at vending Machines
2 As above looking opposite way
3 Skylight restaurant entrance
4 Road by heli pad number plate recognition camera
5 Road by heli pad number plate recognition camera
6 Road by Heli pad
7 Entrance to WRVS
8 Door from WRVS to dermatology
9 Small corridor from WRVS to dermatology
10 Entrance to dermatology from Bromley corridor
11 Endoscopy
12 Endoscopy
13 Endoscopy
14 Endoscopy External entrance

2 Channels spare on DVD recorder

Med Unit Two

1 MU2 looking towards bus stop
2 MU2 looking towards Ripley fields
3 MU2 main entrance

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- 4 MU 2 Reception desk
- 5 MU2 looking towards crèche
- 6 MU 2 rear door
- 7 MU 2 looking towards rear road
- 8 MU 2 looking towards staff car park entrance
- 9 MU 2 corner by mortuary
- 10 MU 2 Staff car park
- 11 Mu 2 Staff car park exit
- 12 MU 2 cycle path
- 13 MU 2 cycle path
- 14 MU 2 cycle path
- 15 MU 2 cycle path
- 16 MU 2 Ambulance delivery/pick up point

All channels used

Women's Unit

- 1 Maternity entrance outside
- 2 Main door inside
- 3 Maternity unit reception desk
- 4 Corridor leading to delivery suite
- 5 Women's unit out patients reception
- 6 Door from delivery suite inside
- 7 Door from delivery suite outside
- 8 Lifts from link corridor to maternity unit
- 9 Lifts to ward 17
- 10 Fire exit ward 17
- 11 Fire exit ward 17
- 12 Doors into ward 17
- 13 Corridor women's unit
- 14 Corridor women's unit
- 15 Corridor women's unit
- 16 corridor to scan rooms

All channels used

Med Unit One / Ashton Rd Clinic Cycle Sheds

- 1 Mu 1 reception desk
- 2 Corridor leading to Oncology
- 3 Chapel entrance door
- 4 Audiology bike shed looking from Hospital
- 5 Audiology bike shed looking from Audiology
- 6 Inside Pharmacy looking towards entrance
- 7 Pharmacy entrance from Bromley corridor
- 8 Door to old switchboard
- 9 internal entrance to endoscopy
- 10 Back road rear of oncology
- 11 Side of canal by Physio Mu1
- 12 Side of canal by Physio Mu1
- 13 Looking towards fire door by Pharmacy
- 14 Looking down Bromley corridor side of Pharmacy
- 15 Bromley corridor towards X-ray entrance
- 16 Turning area by old sewing room

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All channels used

Education Centre / Theatre Corridor /External rear Centenary

- 1 Education centre entrance from inside
- 2 Corridor Education centre
- 3 Corridor Education centre
- 4 library education centre
- 5 Corridor Education centre
- 6 Looking towards MU2 staff car park
- 7 Catering yard
- 8 Rear of Skylight restaurant car park
- 9 Entrance to Theatres Centenary
- 10 Theatre corridor

6 spare channels

Westmorland General Hospital WGH

- Helme Chase Out
- Helme Chase In
- Maternity Level 3 Entrance
- Level 1 Back Door
- X Ray Out
- X Ray In
- Main Entrance Door
- Reception Level 2

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Appendix 2

Access to View Copy of Images – Police

Name of the person making the request:	
Organisation:	
Address:	
Telephone Number:	

Details of Images to be Viewed

Date:			
Has a DP1/Section 29 been received	Yes	No	
Reason:			
For Police Only Signed			Dated:
Request granted:		Request Denied: (Reason)	

To Be Completed If Images Are Removed

Ref No:			
Issued to:			
Crime No: (for Police Only)			
Date issued:			
Issued by:			
Return Date:			
I acknowledge receipt of the above CD:			
Signed:		Date:	

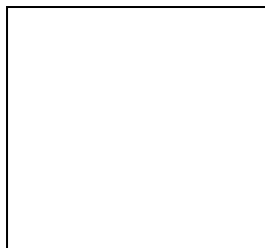
Appendix 3

Request For CCTV Image: Individual Release Form Subject Access Under The Data Protection Act 2018

You are advised that the making of false or misleading statements in order to obtain access to personal information to which you are not entitled is a criminal offence

SECTION 1: Data Subject Details

Please supply a photo to aid in identification (where applicable)



Surname:		Date of Birth:	
Forename(s):		Gender:	
Address:		Home Telephone:	
Postcode:		Work Telephone:	

SECTION 2: Location (Note 1)

Date	Area	Approx. Time	Description

SECTION 3: Declaration Statement (Note 2)

This section must be signed in the presence of the person who certifies your application. I declare that the information in this form is correct to the best of my knowledge and that I am entitled to apply for access to personal data referred to above under. Please tick appropriate box.

I am the person named (go to section 6)

Signature of Data Subject: _____ Date: _____

OR

The terms of the Data Protection Act 1998.

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I am the agent for the person named and I have completed the authorisation section

I am the parent / guardian of the person who is under 16 years old and has completed the authorisation section

I am the parent / guardian of the person who is under 16 years old and who is unable to understand the request (go to section 6)

SECTION 4: Applicant Details (Note 3)

Applicants Name: (please print)	
Address to which reply should be sent (if different from over, Inc. Postcode)	
Signature of Applicant	

SECTION 5: Authorisation Statement

I hereby authorise NHS Direct to release CCTV images they may hold relating to me to _____ (enter the name of the person action on your behalf) to whom I have given consent to act on my behalf

Signature of Data Subject:	
Date:	

SECTION 6: Countersignature (Note 4)

To be completed by the person require to confirm the aplicant's identity

I (insert full name) _____

Certify that the applicant (insert name) _____

Has been known to me as a (insert in what capacity e.g. employee, client, patient etc)

For _____ years and that I have witnessed the signing on the above declaration

Name: (please print)		Profession:	
Address:		Telephone Number:	
Postcode:		Date:	

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Date Request Received:			
Date Form sent to applicant:			
Date Form Returned:		Date sent to systems administrators	
ID Checked:		Date checked	
		Date completed	

NOTES TO ASSIST IN COMPLETE OF THE REQUEST FOR CCTV IMAGE: INDIVIDUAL RELEASE FORM

LOCATION (Note 1)

Provide details of the camera location, and the date and time of the image(s) you would like to see, as well as a general description of your appearance, clothing etc at the time in question.

DECLARATION (Note 2)

The person making the application must complete this section.

If you are the data subject- tick the first box and sign the authorisation then proceed to Section 6

If you are completing this application on behalf of another person, in most instances, we will require their authorisation before we can release the data to you. The data subject whose information is being requested should be asked to complete the 'Authorisation' section of the form. (Section 5)

If the data subject is a child i.e. under 16 years of age the application may be made by someone with parental responsibilities, in most cases this means a parent or guardian. If the child is capable of understanding the nature of the application his/her consent should be obtained or alternatively the child may submit an application on their own behalf. Generally children will be presumed to understand the nature of the application if aged between 12 and 16. However, all cases will be considered individually.

APPLICANT (Note 3)

The applicant is the person who is applying on behalf of the data subject to get access to the CCTV image(s).

COUNTERSIGNATURE (Note 4)

Because of the confidential nature of data held by UHMBT it is essential for us to obtain proof of your identity and your right to receive CCTV image(s). For this purpose it is essential that your application should be countersigned by any one of the following: a Member of Parliament, Justice of the Peace, Minister of Religion, a professionally qualified person (for example, Doctor, Lawyer, Engineer, Teacher), Bank Officer, Established Civil Servant, Police Officer or a person of similar standing WHO HAS KNOWN YOU PERSONALLY. **A relative should not countersign.**

The responsibility of the UHMBFT Officer includes a check to confirm that the countersignature is genuine. In certain cases you may be asked to produce further documentary evidence of identity.

The person who countersigns your application is only required to confirm your identity and witness you signing the 'Declaration' There is no requirement for this person to either see the contents of the rest of the form or to give any assurance that the other particulars supplied are correct.

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Appendix 4: EQUALITY & DIVERSITY IMPACT ASSESSMENT TOOL

		Yes/No	Comments
1.	Does the policy/guidance affect one group less or more favourably than another on the basis of:	No	
	• Age		
	• Disability		
	• Race		
	• Sex		
	• Religious belief – including no belief		
	• Sexual Orientation		
	• Gender reassignment		
	• Marriage and civil partnership		
	• Pregnancy and maternity		
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination are there any exceptions - valid, legal and/or justifiable?		
4.	Is the impact of the policy/guidance likely to be negative?	No	
4a	If so can the impact be avoided?		
4b	What alternative are there to achieving the policy/guidance without the impact?		
4c	Can we reduce the impact by taking different action?		

For advice in respect of answering the above questions, and / or if you have identified a potential discriminatory impact of this procedural document, please contact the relevant person (see below), together with any suggestions as to the action required to avoid/reduce this impact.

For Service related procedural documents: Lynne Wyre, Deputy Chief Nurse & Lead for Service Inclusion and Diversity

For Workforce related procedural documents: Karmini McCann, Workforce Business Partner & Lead for Workforce Inclusion and Diversity.

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