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CCTV Policy

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1 Introduction

Smulders Projects UK of Hadrian Way, Wallsend, hereinafter referred to as the Company, operate a closed circuit television (CCTV) system which records images to protect the Company's property and to provide a safe and secure environment for all personnel including staff, temporary workers, subcontractors, suppliers and for visitors to the Company's business premises, such as clients and customers.

This policy sets out the use and management of the CCTV equipment and images in compliance with Regulation (EU) 2016/679 the General Data Protection Regulation and the Data Protection Act 2018 (Data Protection Legislation).

The Company's CCTV facility records images only. There is no audio recording therefore conversations are not recorded on CCTV.

The system is installed and maintained by 2020 Vision Limited and operated by the Company Security Personnel and the responsible manager is the Head of Security.

The system is operated fairly and lawfully and only used for the purposes for which it is intended and operations give due regard to the privacy of all individuals. Any changes to the purposes for which the CCTV is operated will require pre-approval of the Company Director.

2 Purpose of CCTV

The purpose of the company installing and using a CCTV system includes:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Company's business premises and belongings.
- To ensure that health and safety rules and company procedures are being complied with.
- To assist with the identification or factual analysis of unauthorised actions or unsafe working practices that might result in formal proceedings being instituted against staff and to assist in providing relevant evidence.
- To promote productivity and efficiency.
- To support any insurance claims where required.
- To monitor staff entry and exit times from the premises.
- To establish the facts of an event, as part of the subsequent investigation following any incident.

3 Location of Cameras

Cameras are located at strategic points throughout the Company's business premises, principally at the entrance and exit points and also at multiple locations around the facility. The Company has positioned the cameras so that they only cover communal or public areas on the Company's business premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, worker kitchen areas, worker break rooms or offices that are provided for individual workers.

All cameras (with the exception of any that may be temporarily set up for covert recording) are clearly visible. An overview of all camera locations can be requested at all times.

Appropriate signs are prominently displayed so that staff, clients, customers and visitors are aware they are entering an area covered by CCTV. The signage is in English, Polish and Portuguese and includes pictograms for clarity.

4 Covert Recording

Covert cameras may be used only in very limited circumstances. This requires pre-approval of the Company Director and written authorisation from the Head of Security. Covert surveillance may be carried out in cases of suspected criminal activity where individuals are not informed that the recording is taking place so as not to prejudice the prevention or detection of such activity. Any request to use covert surveillance must include a justification of the need to use such a method to obtain evidence of suspected criminal activity; details of

alternative methods already used together with a timescale of how long the covert monitoring should take place. Any decision to use covert surveillance for any reason must be fully documented in a **Data Register [D-HSM-SPU-003 CCTV Data register covert recording]** and retained securely.

5 Monitoring and Handling

Images captured by the CCTV system are recorded continuously and may be monitored at the Main Security Gatehouse (Gate B). Access inside the Gatehouse is strictly limited to authorised personnel such as Security Personnel, Head of Security and the Company Director.

Access to CCTV images and recordings will only be granted on a strict prior approval basis.

2020 Vision Limited carry out regular maintenance checks of the equipment to ensure it is working properly and that the media is producing high quality images.

All Security staff working at the Gatehouse are made aware of the sensitivity of handling CCTV images and recordings. The Head of Security is responsible for ensuring that authorised staff are fully briefed and trained in all aspects of the operational and administrative functions of the system and compliance with the Data Protection Legislation. Further information on how the Company use your personal data can be found in **Smulders' Newcastle Privacy Notice D-HSM-SPU-005** which can be obtained from the HR Department, the Recruitment Agency and is also on SharePoint.

Where access to CCTV images and recordings is required for the purposes of a fact-finding investigation or exercise, this will be controlled and monitored by the Company Director.

6 Information Retention

CCTV footage is normally kept for up to 50 days, it is stored securely and then disposed of in accordance with the Company's **Data Protection P-HRM-SPU-003** and **Retention Policy P-HRM-SPU-002**. In exceptional circumstances where there is potential for an insurance claim, specific footage that could help support that claim may be kept securely for 3 years or until the claim in question has been concluded. Where there is a need for CCTV images to be released to a third party, we will assess any risk to the interests, rights and freedoms of individuals prior to its release.

No further images or information is stored other than is required for the stated purpose.

7 Access

Access to images is restricted to those who need to have access in accordance with this policy and legislation. Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with the Data Protection Act.

Anyone who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by the Data Protection Legislation ("Subject access request"). Data subjects also have the right to request that inaccurate data be corrected or erased and to seek redress for any damage caused. Procedures are in place to ensure all such access requests are dealt with in line with this policy.

If you wish to access any CCTV images relating to you, you are requested to make a written request to the Head of Security; You will be asked to complete a 'Subject Access Request Form' **[D-HSM-SPU-004]**, this form sets out the exact requirements that the Company needs to process your request. It is important that you provide the required information in a timely manner. The Company will respond to you in one calendar month of receiving adequate information to process your request.

You have further rights in regards to CCTV images that identify you under the Data Protection Legislation which are set out in our **Data Protection Policy P-HRM-SPU-003** which are:

- To request erasure of your personal Data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

- To object to processing if you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- To request restriction of processing of your personal data where you need us to hold the data even if we no longer require it as you may need it to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- To complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection (www.ico.org.uk) about how we process your personal data.

8 Compliance

Images obtained from the CCTV system which include recognisable individuals constitute personal data which is covered by the Data Protection Legislation. The Company is a Registered Data Controller of this data under the terms of the Act. The Company have Appointed Responsible People to manage information of a personal and sensitive nature and ensure compliance with the Data Protection Legislation and our Data Protection and Privacy Policies.

9 Use of Additional Surveillance Systems

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a data protection impact assessment (DPIA).

A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Full guidance on completing DPIAs is available from the Information Commissioner's Office, here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>.

10 Sharing and Disclosure of Data Gathered by CCTV

We may engage data processors to process data on our behalf, such as 2020 Vision Limited. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

11 Queries and Concerns

Any concerns or complaints about the use of the CCTV system or the handling/storage of the data should be raised with the Head of Security on +44 (0)191 2958779. Alternatively, where you feel it more appropriate for somebody else to deal with your concern, please contact the HR Manager on +44 (0)191 2956728.

12 Other Documents

Other documents to be read in conjunction:

D-HRM-SPU-003	Smulders Newcastle Privacy Notice
D-HRM-SPU-004	Subject Access Request Form
P-HRM-SPU-002	Retention Policy
P-HRM-SPU-003	Data Protection Policy
P-HSM-SPU-001	Yard Agreement
P-HSM-SPU-011	Code of Conduct