

CCTV Policy

1. Introduction

Edgewater Contracts & Specialist Joinery, we the Company, use closed circuit television (CCTV) and the images produced for the following reasons:

- **Security** - to prevent or detect crime and to monitor the business premises and grounds in order to provide a safe and secure working environment for our employees and visitors, and to prevent loss or damage to property.
- **Accidents** – to help the Health & Safety department with accident investigations.
- **Deliveries** – to check if and when deliveries arrived.
- **Incidents** – view footage to determine series of events leading up to incident and non-conformance deterrent.
- **Insurance** – to help reduce insurance premium
- **Employee Issues** – to assist with issues that may arise, for example timekeeping.

We own and operate a CCTV system at Head Office which comprises of fixed cameras that do not have sound recording capabilities. On occasions, we may also operate CCTV systems on construction sites that we have been contracted to operate on. The CCTV is monitored and controlled centrally from secure locations either in Head Office or on individual sites.

The company is registered with the Information Commissioner. All authorised CCTV Controllers and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images.

2. Statement of Intent

We ensure ongoing compliance with the Information Commissioner's Office (ICO) CCTV Code of Practice by:

- keeping this policy under review and up to date;
- CCTV warning signs are clearly and prominently placed at the main external entrances to the building as well as being placed in close proximity to the cameras positions; and
- In areas where CCTV is used, the company will ensure that there are prominent signs placed within controlled area;
- Cameras are sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The company will make effort to position cameras so that their coverage is restricted to the business premises or working environments on site, which includes outdoor/indoor areas.

The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident.

3. Convert Monitoring

It is not the company's policy to conduct 'Convert Monitoring' unless there are 'exceptional reasons' for doing so.

4. Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the right of the people whose images have been recorded.

All retained data will be stored securely at all time and permanently overwritten after a maximum of 60 days. Data connected to an investigation or other formal procedure will be retained until that matter has concluded.

5. Access to CCTV images

Access to recorded images will be restricted to CCTV Controllers as specified in the Procedure Manual. They will not be made more widely available, unless we are legally obliged to do so, or they are required as part of an investigation.

6. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under GDPR.

All requests should be made in writing to Data Protection Representative (DPR). Individuals submitting the request for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The company will respond to requests within 30 days of receiving the written request.

The company reserve the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the company where these would reasonably need access to the data.

Requests for CCTV data should be made in writing to the DPR.

The data may be used within Company procedures, such as discipline and grievance but will continue to be subject to the usual confidentiality requirements of those procedures.

8. Complaints

Complaints and enquires about the operation of CCTV within the company should be directed to the CCTV Controller peter.gregg@edgewatercontracts.co.uk

9. Policy Review

Our usage of CCTV and this policy will be kept under review and formally reviewed on an annual basis.

Signed:



Date:

24/10/19

Review Date:

25/10/20

Chief Executive Officer