

Closed Circuit Television (CCTV) policy and procedure

Policy statement

This policy sets out the company's position on the use of on-board incident capture devices (CCTV) in vehicles, premises and its effects on employees.

Purpose and Scope

The primary use of the CCTV is to assist in the protection and safety of persons and property or detection of criminal offences, defence of legal claims, and most importantly, driver training. It is not the Company's intended purpose to use the CCTV for monitoring the work of employees or finding out whether they are complying with the organisation's policies and procedures.

Principles

The following principles apply:

CCTV cameras will be installed when appropriate in company vehicles and premises. The cctv cameras are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.

All staff are aware if there is cctv cameras in their vehicle and will have been provided with the manufacturer's overview sheet, which they are requested to sign. This exercise for new employees joining the team is carried out as part of their induction. No images and information will be stored except where a relevant incident has occurred.

Access to retained images and information will be restricted, with clearly defined rules to Designated Responsible Persons (DRPs) who can gain access. The cctv is not normally active and cannot be remotely viewed in real time. The cctv cannot be accessed covertly to monitor the quality and amount of work completed by employees' or movements. However, where an incident is captured that reveals inappropriate conduct that cannot in good conscience be ignored, the company and any division thereof, reserve the right to process in the business interests. This may include grievance, or disciplinary proceedings, defence or litigation of a legal claim, and staff training.

When relevant cctv footage may be retained and used for future health and safety training, including the improvement in safety, quality and training of staff. We shall seek the employees' consent, if we wish to use it for this purpose. Recordings images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

CCTV recordings

Access is approved on an incident by incident basis. Once access is approved by the designated responsible person, recorded footage can be reviewed (Not deleted or amended) by:

- Chief Information Officer
- Directors
- Transport Manager
- Operations Managers
- Statutory bodies such as POLICE, HSE

Any person with interest must obtain authority from the chief information officer to view recorded footage, providing reasons and justification.

Any person whose images are recorded have a right to view those images, and to be provided with a copy of those images, within one month of making a written subject access request. Availability of images will be subject to the retention period. Employees making such a request should do so in writing, providing the relevant time and date of the image, so that they may be easily identified.

The request should be made in writing to Stephen Browne Chief Information Officer at the company address 112 St Johns Rd Gillingham Kent ME7 5PG

Employees

As stated, the primary uses of cctv are to assist in the protection and safety of persons and property, preventing or detection of criminal offences, defences of legal claims and staff training. However, when cctv cameras are deployed, they are likely to capture pictures of employees and workers. In accordance with the above, cctv evidence may be used as part of an employee investigation where, in the reasonable belief of management, that there may have been misconduct, or breach of health and safety. In such cases the footage must be requested by the directors. Where footage is used in disciplinary proceedings, it will be retained for a further period of up to five years. The employee will be permitted to see and respond to the images, in addition to their right to request a copy, which will be provided within one month.

Nonemployees

Where an incident involves a third party, the relevant insurers will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of cctv footage, a copy of the recorded material can only be obtained if requested by the subject themselves. Third parties should also be aware that under appropriate circumstances the footage may be provided to police (or other competent authority) with intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery. Footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

Complaints

Complaints about the operation of the cctv system should be addressed initially to Chief Information Officer in writing to the company address 112 St Johns Rd Gillingham Kent ME7 5PG

Monitoring and review

This policy will be regularly reviewed, or sooner if there is a policy need or legislative change.

This policy does not form part of the employee's terms and conditions of employment and may be subject to change at the discretion of the GDPR manager.

Registered with the Information Commissioner's Office

ICO registration No ZA561866