



## **Introduction**

This policy sets out how our company's approach to the use of CCTV in the workplace affects staff.

Cameras are normally located in the counter area and office area of each branch. Using CCTV is necessary for the company's legitimate interests. Cameras are installed for the purpose of detecting and preventing crime or serious misconduct by staff and for the safety and security of our staff.

The data controller is The Fascia Place Limited. The company has appointed Jon Preece as its interim data protection officer. The company will look to appoint a permanent DPO in due course.

This policy does not form part of your contract of employment and we reserve the right to amend it at any time.

## **Purpose of CCTV**

The company will not use CCTV for monitoring the work of workers or finding out whether or not they are complying with the company's policies and procedures.

CCTV will be installed only if the company decides after an impact assessment that it is a necessary and proportionate way of dealing with a problem. The company will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of staff privacy, and that any intrusion is fully justified.

In areas of surveillance, signs will be displayed prominently to inform staff that CCTV is in use. If workers access the relevant areas, their images will be captured on CCTV.

## **Limits on use of CCTV**

CCTV will not be operated in toilets, private offices or changing rooms, unless this is necessary for the investigation of a serious crime or there are circumstances in which there is a serious risk to health and safety or to the operation of the employer's business. CCTV will be used in this way only where it is a proportionate means of achieving the aim in the circumstances.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has a reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence. Any covert recording will be strictly time limited.

## **Evidence from CCTV footage**

CCTV evidence may be used against staff in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that they have been guilty of serious misconduct. The individual will be given a chance to see and respond to the images in these circumstances.

## **Storage of CCTV footage**

Images from CCTV footage will be securely stored and only authorised personnel will have access to them. This will normally be members of the company's security team. It could also include members of HR, a line manager, and managers in the business area in which the footage is taken. However, information would normally be shared only in this way if the company has reason to believe that a criminal offence or serious misconduct has occurred. Surveillance information may also be shared with law enforcement agencies for the purposes of detecting crime.

The images will be retained only long enough for an incident to come to light and any investigation to be conducted. In normal circumstances, CCTV footage will be securely deleted after 90 days.

Workers whose images are recorded have a right to view images of themselves and to be provided with a copy of the images. Workers making such a request should provide the company with a photograph or a description of themselves, together with the relevant time and date of the image, so that they may be easily identifiable. If you want to make a request, please use the company's form for making a subject access request, available from your Line Manager.

Workers will be allowed access to such images within one month of the request, although in some cases, particularly where large amounts of data is processed, that time period may be extended to three months.