

Reviewed no change, January 2026

Introduction

The Company uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to the Company's business premises, such as clients, customers, contractors, and suppliers, and to protect the Company's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the General Data Protection Regulations (GDPR) and the CCTV Code of Practice.

The Company's CCTV facility records images only. There is no audio recording i.e., conversations are not recorded on CCTV (but see the section on covert recording).

Purposes of CCTV

The purposes of the Company installing and using CCTV systems include:

- 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.
- To ensure that health and safety rules and Company procedures are being complied with.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence.
- To promote productivity and efficiency.

Because CCTV involves the processing of personal data, we have registered our use of CCTV with the Information Commissioner's Office (ICO).

We consider the processing of personal data as CCTV images to be justified for the purposes of our legitimate interest in maintaining health, safety, and security on our premises, deterring crime, and assisting with the identification of offenders.

Location of cameras

Cameras are located at strategic points throughout the Company's business premises, principally at the entrance and exit points. 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 most relevant to the purposes for which the CCTV is used. No camera focuses, or will focus, on toilets, staff kitchen areas or private offices.

All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.

Appropriate signs are prominently displayed so that employees, clients, customers, and other visitors are aware they are entering an area covered by CCTV and the purpose for it.

Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than six weeks. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of six weeks. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted and carefully controlled, thereby ensuring that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with Company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Managing Director(s) of the Company (or another senior director acting in their absence) are the only people who are permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individuals' access rights

Under the GDPR, individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to the Company's Data Protection Officer. Only in very limited circumstances is the Company entitled to make a small charge for the supply of the images requested. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located, and your identity can be established as the person in the images. The Company will respond promptly and in any case within 30 calendar days of receiving the request.

The Company will always check the identity of the employee making the request before processing it.

