

CCTV Policy

Lead responsibility for policy Rachel Walker

Date: March 2022

Approved Date:04/03/2022

1.0 General

1.1 Luxury Lockstitch UK uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the buildings in order to provide a safe and secure environment for staff and visitors, and to prevent the loss or damage to raw materials, finished products and the property.

1.2 CCTV surveillance in LLUK is intended for the purposes of:

- Protecting the building and company assets, both during and afterwork hours;
- Promoting the health and safety of staff and visitors;
- Reducing the incidence of crime and anti-social behaviour(including theft and vandalism);
- Supporting the Police in a bid to deter and detect crime;
- Assisting in identifying, apprehending and prosecuting offenders.

1.3 The system comprises of a number of 4 fixed cameras at each fire exit and the shop front.

1.4 The CCTV system is owned and operated by LLUK and the deployment of which is determined by LLUK's management team. The CCTV is a standalone system and operated by the company.

1.5 The CCTV is monitored centrally from the office and via an app which can be viewed remotely by members of the management team.

1.6 LLUK's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines our use of CCTV and how it complies with the Act.

1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.8 LLUK complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

1.10 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by LLUK, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other related legislation.

2.0 Justification for Use of CCTV

2.1 The use of CCTV to control the perimeter of the company's building for security purposes has been deemed to be justified by the management team. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of anti-social behaviour.

2.2 CCTV systems will not be used to monitor normal employee activity in the work place.

3.0 Data Protection Impact Assessments

3.1 Where new CCTV systems or cameras are to be installed, the company will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with staff.

3.2 Where existing CCTV systems are in operation as of March 2022, LLUK will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3 year period from the date of the implementation of GDPR, whichever is sooner.

4.0 Location of Cameras

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 LLUK will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. LLUK will make every effort to position cameras so that their coverage is restricted to LLUK's premises, which may include outdoor areas.

4.3 CCTV will not be used in the kitchen and or bathrooms.

4.4 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. LLUK has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

5.0 Covert Surveillance

5.1 LLUK will not engage in covert surveillance.

6.0 Notification

6.1 A copy of this CCTV Policy will be provided on request to staff and visitors to the company.

6.2 The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Appropriate locations for signage will include:

- At entrances to premises i.e. external doors
- Production area
- At or close to each internal camera

7.0 Storage and Retention

7.1 The images captured by the CCTV system will be retained for a maximum of 6 months, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Managing Director. The Managing Director may delegate the administration of the CCTV System to another staff member.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7.5 Files will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

8.0 Access

8.1 Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only.

8.3 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- By the police where LLUK are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/ or when it is suspected that illegal/anti-social behaviour is taking place on LLUK's property,
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the companies insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 Individuals submitting requests 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.

9.3 LLUK will respond to requests within 30 calendar days of receiving the request in line with the companies right of access policy.

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

9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, LLUK provide a still/series of still pictures, a file with relevant images. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to 3rd parties LLUK will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

10.1 Complaints and enquiries about the operation of CCTV within LLUK should be directed to the managing director in the first instance.

11.0 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

12.0 Responsibilities

12.1 The Managing Director (or nominated staff member) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by LLUK
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at LLUK is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
- Ensure that monitoring recorded tapes are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within LLUK and be mindful that no such infringement is likely to take place
- Co-operate with the Health & Safety Officer of LLUK in reporting on the CCTV system in operation in the company
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"

- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on digital recordings are stored for a period not longer than 6 months and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.