

Closed-Circuit Television (CCTV) Policy

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1 INTRODUCTION TO POLICY

1.1. It is important that **Shipping and Storage Containers UK Ltd (Trading as HOARD)** and all its employees conduct themselves in accordance with the published standards of business ethics and conduct. The purpose of this procedure is to ensure consistent and fair treatment of disciplinary issues and to help encourage employees to achieve and maintain appropriate standards of conduct, thereby avoiding the need for further disciplinary action.

1.2. **Shipping and Storage Containers UK Ltd (Trading as HOARD)** will endeavour to update this document with developments in legislation and best practice, ensuring

that amendments are incorporated without delay.

2 STATUS OF THIS POLICY

2.1 This policy does not give contractual rights to individual employees. The company reserves the right to alter any of its terms at any time although employees will be notified of any changes.

3 ELIGIBILITY

3.1 This policy applies to all employees, temporary staff and subcontractors working or providing a service for the Company.

4 GENERAL PRINCIPLES

4.1 The company uses its CCTV system to help protect against crime and also aids

in the safety of staff and customers whilst on our premises, and root cause analysis. The purpose of this policy is to regulate the management, operation and use of the CCTV system.

4.2 CCTV warning signs are clearly and prominently displayed at the main external entrances to our buildings, including further signage in other outdoor areas or warehouses we operate in close proximity to the camera positions. Signs will contain the details of the purpose for using CCTV (see appendix A).

4.3 The company is registered with the Information Commissioners' Office as a controller. Also, the use of CCTV and its associated images are in line with UK GDPR, DPA and the CCTV Code of Practice published at - <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

4.4 Objectives of the CCTV System:

- To provide a safe and secure environment for staff and visitors.
- To protect the company buildings and assets within those buildings.
- To increase personal safety and reduce the fear of crime.
- To support the Police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders.
- To protect members of the public and private property.
- To provide supporting root cause analysis in the event of a performance / quality incident.

5 INSTALLATION & MAINTENANCE

5.1 Cameras are sited so that 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 ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act/UK GDPR.

5.2 The company will make every effort to position cameras so that their coverage is restricted to the company premises, which includes outdoor/indoor areas.

5.3 Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

5.4 The system comprises of a number of static and dome cameras located around the site. Various camera footage can be viewed in the following server rooms unit 1 \ unit 2 \ unit 5 and mariner house.

5.5 The CCTV will be in operation 24 hours a day, every day of the year. Images are automatically deleted after one calendar month. The system is operated by the IT Department on behalf of the Directors in accordance with the principles and objectives expressed in this policy.

5.6 The Directors may, on a daily basis check that all cameras are functional and the system is recording properly. Unless an immediate response to events is required, or in anticipation of an event occurring, the cameras are not pointed directly at an individual or specific group of individuals.

5.7 The system will be subject to annual maintenance and repairs. Equipment and recordings may be only be viewed by personnel authorised to undertake installation and maintenance of the CCTV systems.

5.8 Viewing during maintenance will be restricted to that necessary for system work.

6 COVERT MONITORING

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

6.2 The company may, in exceptional circumstances, determine a sound reason to set up covert monitoring. For example:

- i) Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

6.3 In these circumstances' authorisation must be obtained from the Managing Director.

6.4 Covert monitoring must cease following completion of an investigation.

6.5 Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, etc.

7 STORAGE AND RETENTION OF CCTV IMAGES

7.1 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 rights of the people whose images have been recorded.

7.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

8 ACCESS TO CCTV IMAGES

8.1 Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.

9 SUBJECT ACCESS REQUESTS (SAR)

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

All requests should be made in writing to the Data Protection Officer via info@hoardcontainers.co.uk.

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 The company will respond to requests within 1 month of receiving the written or verbal request.

9.4 No charge can be made for access to data unless it is excessive or unfounded.

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

10 ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

10.1 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 (e.g. investigators).

10.2 Requests for images / data should be made in writing to the Site Director.

10.3 The data may be used within the company's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

11 BREACH OF POLICY & SECURITY

11.1 Any breach of this Policy will initially be investigated by an appointed manager, in order for the appropriate action to be taken, which may lead to disciplinary action, up to and including dismissal.

12 DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

12.1 CCTV has the potential to be privacy intrusive. Each site will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

13 MISUSE OF CCTV SYSTEMS

13.1 The misuse of the CCTV system could constitute a criminal offence.

13.2 Any member of staff who breaches this policy may be subject to disciplinary action.

14 COMPLAINTS

14.1 Complaints and enquiries about the operation of CCTV within the company should be directed to the DPO in the first instance.

14.2 A copy of this Policy is available upon request.

15 FURTHER INFORMATION

Further information on CCTV and its use is available from the following:

In the picture: Surveillance Camera Code of Practice published in June 2013 and amended in November 2021

<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachme>

nt_data/file/1035067/Surveillance_Camera
_CoP_Accessible_PDF.pdf
Data Protection Act 2018
UK GDPR (25 May 2016)

16 APPROVAL

This policy has been approved by the Directors of Shipping and Storage Containers UK Ltd (Trading as HOARD).

17 VERSION CONTROL

VERSION	APPROVER	DATE	CHANGES
V.1.0	Simon Jennings	April 2023	First issue

APPENDIX A – CCTV Signage

It is a requirement of the Data Protection Act 2018 to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The company is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the Company
- The contact telephone number or address for any enquiries

Example sign.



APPENDIX B – Checklist

This CCTV system and the images produced by it are controlled by the IT Manager who is responsible for how the system is used under direction from the company's Data Protection Officer. The company notifies the Information Commissioner about the CCTV system, including any modifications of use and/or its purpose (which is a legal requirement of the current Data Protection Act 2018).

Shipping and Storage Containers UK Ltd (Trading as HOARD) has considered the need for using CCTV and have decided it is required for the areas stated in para 4.4. It will not be used for other purposes. The company will conduct regular reviews of our use of CCTV.

	Checked (Date if appropriate)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.	Yes		
A system had been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required	Yes		
Staff will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate.	Yes		
Cameras have been sited so that they provide clear images.	Yes		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes		

The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.	Yes		
Except for law enforcement bodies, images will not be provided to third parties.	Yes		
The company knows how to respond to individuals making requests for copies of their own images. If unsure the data controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes. (Daily checks)		