

# CCTV Policy

## Contents

1. Scope .....	2
2. Purpose of CCTV .....	2
3. Limits on use of CCTV .....	2
4. Evidence from CCTV footage .....	2
5. Storage of CCTV footage.....	2

## 1. Scope

This policy sets out how the organisation's approach to the use of CCTV in the workplace affects employees.

Cameras are normally located in grading buildings, public areas and car parks. Using CCTV is necessary for the organisation's legitimate interests. Cameras are installed for investigating health and safety incidents but may also be used to deter criminal activity.

The data controller is Spearhead International Ltd.

## 2. Purpose of CCTV

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

CCTV will be installed only if the organisation decides after an impact assessment that it is a necessary and proportionate way of dealing with a problem. The organisation 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 employees that CCTV is in use. If workers access the relevant areas, their images will be captured on CCTV.

## 3. Limits on use of CCTV

CCTV will not be operated in toilets, private offices or changing rooms.

Concealed CCTV is only used in grading areas for food safety.

## 4. Evidence from CCTV footage

CCTV evidence may be used against an employee in disciplinary proceedings only where such evidence tends to show, in the reasonable belief of the employer, that he or she has been guilty of serious misconduct. The employee will be given a chance to see and respond to the images in these circumstances.

## 5. Storage of CCTV footage

Images from CCTV footage will be securely stored, and only authorised personnel will have access to them. This will normally include members of HR, an employee's 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 organisation 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 within 30 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 organisation 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 send the request to [sar@spearheadgroup.co.uk](mailto:sar@spearheadgroup.co.uk).

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