



CCTV Policy

(Code of Practice)

Dated: July 2021

Review June 2022

1. Introduction

- 1.1 Moore-Wilson uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the office suites and communication room in order to provide a safe and secure environment for staff and visitors, and to prevent loss or damage to company property.
- 1.2 The system comprises several fixed cameras.
- 1.3 The system has sound recording capability.
- 1.4 The CCTV system is owned and operated by Moore-Wilson, the deployment of which is determined by the IT department.
- 1.5 The CCTV system can be monitored remotely by the IT department. Account access to the images is controlled by the IT Department Head and all accounts are password protected with two factor authentication enabled.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff.
- 1.7 The company's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 2018. The use of CCTV, and the associated images are covered by the Data Protection Act 2018. This policy outlines the company's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The company's 'Data Controller' (Steve Wilson) will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

2. Statement of Intent

- 2.1 The company complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:
<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>
- 2.2 CCTV warning signs are clearly and prominently placed at the doors to each suite, including further signage for the communications room. Signs will contain details of the purpose and use of CCTV in operation and details on how individuals may find further information (see appendix B). In areas where CCTV is used, the company will ensure that there are prominent signs placed within the controlled area.
- 2.3 The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3. Siting the Cameras

- 3.1 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/GDPR.
- 3.2 The company will make every effort to position cameras so that their coverage is restricted only to the areas under lease to the company by The Portway Centre Limited.
- 3.3 CCTV will be used in office areas but limited to entrance and exits which may always not be easily monitored.
- 3.4 Members of staff will have access to details of where CCTV cameras are situated.

4. Storage and Retention of CCTV images

- 4.1 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.
- 4.2 Retained data will always be encrypted during transmission and when stored at rest. Data can also be permanently deleted as appropriate / required.

5. Access to CCTV images

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

6. Subject Access Requests (SAR)

- 6.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act/GDPR.
- 6.2 All requests should be made in writing to the data@m-w.co.uk email address or physically F.A.O. the 'Data Controller'. Individuals submitting requests for access will be asked to provide adequate information to enable the footage relating to them to be identified. For example, date, time and location.
- 6.3 The company will respond to requests within 30 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.
- 6.4 The company 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.

7. Access to and Disclosure of Images to Third Parties

- 7.1 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).
- 7.2 Requests for images / data should be made in writing to the Data Controller.
- 7.3 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.

8. Complaints

- 8.1 Complaints and enquiries about the operation of CCTV within the premises should be directed to the Data Controller in the first instance.

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

- CCTV Code of Practice Revised Edition 2017 (published by the Information Commissioners Office) Version 1.2
- www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 2018 (DPA)
- General Data Protection Regulation (GDPR)

Appendix A – Checklist

This CCTV system and the images produced by it are controlled by the Business Manager who is responsible for how the system is used under direction from the company's 'Data Controller'. 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).

Moore-Wilson has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of the company's staff. It will not be used for other purposes. The company will conduct regular reviews of our use of CCTV.

	Checked	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes.	Head of IT	June 2021
There is a named individual who is responsible for the operating of the system.	Yes.	Head of IT	June 2021
A system has 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.	IT Department	June 2021
Staff will be consulted about any proposal to install / amend CCTV equipment or its use as appropriate	Yes.	Head of IT	June 2021
Cameras have ben sited so that they provide clear images.	Yes.	IT Department	June 2021
Cameras have been positioned to avoid capturing the images of persons not visiting the premises	Yes.	IT Department	June 2021
There are visible signs showing that CCTV is in operating. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s)	Yes.	IT Department	June 2021
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them	Yes.	Head of IT	June 2021
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.	Head of IT	June 2021
Except for law enforcement bodies, images will not be provided to third parties.	Yes.	Managing Director	June 2021

The organisation 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.	Head of IT	June 2021
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes. (Weekly checks)	IT Department	June 2021

Appendix B – 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 web address where further information can be found for such as the company's contact telephone number or address for any enquiries.



Example sign