



CCTV POLICY

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 Regulation, the Data Protection Act 2018 and the Information Commissioner's Office Code of Practice for Surveillance Cameras and Personal Information.

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

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
- assist in the identification and prosecution of offenders
- monitor the security of the Company's business premises
- ensure that health and safety rules and other Company rules, policies and procedures are being complied with
- assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary or performance management proceedings being instituted against employees and to help in providing relevant evidence
- establish the existence of facts
- promote productivity and efficiency.

The Company is committed to being transparent about how and why CCTV systems are used.

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. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms 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 and clearly displayed so that employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

Recording and retention of images

Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. 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 three months. 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 three months. 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. This ensures 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 which may include being used in evidence in court or tribunal proceedings
- line managers involved with Company disciplinary 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).

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 General Data Protection Regulation, individuals have the right on request to receive a copy of the personal data that the Company holds about them by making a data subject access request, including CCTV images if they are recognisable from the image.

If you wish to exercise your data subject access rights and access any of your CCTV images, please send the request to the Data Protection Compliance Executive at customerservices@vinesgroup.net. Your request should include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images. We will inform you if we need to further verify your identity.



The Data Protection Executive will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Covert recording

The Company will only undertake covert recording with the written authorisation of the Managing Director or Head of Business where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will immediately cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

Vehicle tracking and monitoring

The Company also reserves the right to install monitoring devices such as satellite tracking and in-vehicle camera systems in all company vehicles to track the movement of the vehicle and record images of its use for business purposes. Such devices may record or transmit images or information such as the location of the car, the distance it has covered, its speed, related information about the user's driving habits, the persons present in the vehicle, accidents or incidents, etc. The employee will be advised if a monitoring device has been installed, or will be installed, in their company vehicle and will also be advised of the nature of the monitoring that will take place. This CCTV policy applies, as appropriate, to any in-vehicle camera system.

The purposes of vehicle tracking and monitoring are to:

- assist in the prevention or detection of crime or equivalent malpractice
- assist in the identification and prosecution of offenders
- meet our obligations under health and safety laws and protect the health, safety and welfare of drivers, particularly those who are either lone drivers or are carrying customers or clients as passengers or are carrying valuable cargo
- ensure adherence to Company rules, policies and procedures
- help prevent accidents by monitoring driver speed and habits
- provide evidence for insurers in the event of accidents and help the Company to establish, exercise or defend possible legal claims
- maximise driver performance and productivity and improve customer service
- improve fuel economy by monitoring and managing company vehicles more effectively.



The Company may use the information obtained from vehicle tracking and monitoring as evidence in any subsequent disciplinary action where the data shows there has been a breach by the employee of Company rules and procedures.

Staff training

The Company will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the General Data Protection Regulation and the Data Protection Act 2018 with regard to that system.

Review

Our policies are reviewed from time to time and may at any time publish replacement or revised versions of this policy to reflect developments in the business, for changes to legislation or procedures. The HR department are responsible for implementing and maintaining this policy.

This policy will be permanently available to all staff on Vinesweb, or by your HR Department and will be sent via email when significant amendments are implemented.