



Knight Strip Metals Ltd

CCTV Policy (Code of Practice)

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1 Introduction

- 1.1 Knight Strip Metals Ltd uses closed circuit television (CCTV) and the images produced to prevent or detect crime & the images will be used in the event of a health or safety incident.
- 1.2 The system comprises a number of fixed and dome cameras.
- 1.3 The systems do not have sound recording capability.
- 1.4 The CCTV systems are owned and operated by Knight Strip Metals Ltd, the deployment of which is determined by James Needs
- 1.5 The CCTV is monitored via the web application/Mobile application and only used in the event of a crime or a health/safety incident
- 1.6 The CCTV systems are maintained by Chubb and Mainstream Systems Ltd.
- 1.7 The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images are covered by the Data Protection Regulation.
- 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 'Data Controller' 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 Knight Strip Metals Ltd 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 main external entrance to estate, including further signage in other outdoor and indoor areas in close proximity to camera positions. In areas where CCTV is used, Knight Strip Metals Ltd 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. Knight Strip Metals Ltd will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act/GDPR.
- 3.2 Knight Strip Metals Ltd will make every effort to position cameras so that their coverage is restricted to the business premises, which includes outdoor/indoor areas.
- 3.3 CCTV will only be used in areas where theft could occur and other areas within the building to protect areas that contain high value items and potential Health/Safety incidents.
- 3.4 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.

4 Covert Monitoring

- 4.1 It is not Knight Strip Metals Ltd policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' for doing so.
- 4.2 Knight Strip Metals Ltd 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.
- 4.3 In these circumstances authorisation must be obtained from a member of the senior leadership team and 'Data Controller' advised before any commencement of such covert monitoring.
- 4.4 Covert monitoring must cease following completion of an investigation.
- 4.5 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, changing areas etc.

5 Storage and Retention of CCTV images

- 5.1 Recorded data will not be retained for longer than is necessary, which is normally 30 days. In the event of an incident, the data will be retained for as long as is required. 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.
- 5.2 All retained data will be stored securely at all times and permanently deleted as appropriate / required.

6 Access to CCTV images

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

7 Subject Access Requests (SAR)

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

7.2 All requests should be made in writing to the MD. 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.

7.3 Knight Strip Metals Ltd will respond to requests within 40 calendar days of receiving the written request and any fee. This is as per the ICO CCTV Code of Practice.

7.4 A fee of £10 may be charged per request. This is as per the ICO CCTV Code of Practice.

7.5 Knight Strip Metals Ltd 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.

8 Access to and Disclosure of Images to Third Parties

8.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to Knight Strip Metals Ltd where these would reasonably need access to the data (e.g. investigator or insurance companies).

8.2 Requests for images / data should be made in writing to the MD.

9 Complaints

9.1 Complaints and enquiries about the operation of CCTV should be directed to the MD in the first instance.

Data Controller: James Needs

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
- GDPR (wef 25 May 2018)