

CCTV Policy and Procedures

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1. POLICY STATEMENT

This policy sets the Group's position on the use of CCTV in the workplace and its effect on employees, contractors and visitors.

2. PURPOSE AND SCOPE

The primary uses of CCTV are to assist in the Protection and Safety of Persons and Property, Prevention or Detection of Criminal Offences and Defence of Legal Claims.

It is not the Group's intended purpose to use CCTV for monitoring the work of employees or finding out whether or not they are complying with the organisation's policies and procedures.

3. PRINCIPLES

The following principles apply:

- a. CCTV will be installed only when and where it is necessary.
- b. The Group will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.
- c. Signs will be displayed prominently to inform employees, contractors, visitors and other individuals that CCTV is in use.
- d. No images and information will be stored beyond those which are strictly required for the stated purpose of a surveillance camera system.
- e. Access to retained images and information will be restricted, with clearly defined rules and Designated Responsible Persons (DRPs) who can gain access.

- f. It is not the intention that CCTV in the Group be used to monitor the quality and amount of work completed by an employee. However, in the course of normal monitoring, where an incident is captured that cannot in good conscience be ignored, the Group and any Division thereof, reserve the right to process in the business interests. This may include grievance, or disciplinary proceedings, and defence or litigation of a legal claim.
- g. Surveillance images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

4. CCTV FOOTAGE

Live CCTV footage can only be viewed by: Security Personnel, Directors and Management

Access is approved on an incident by incident basis. Once access is approved by the Designated Responsible Person, recorded CCTV footage can be reviewed (not deleted or amended) by:

- Chief Information Officer
- Director
- Factory Manager
- HR Manager
- QHSE Manager
- QHSE Officer (providing authority is provided by HR Manager or QHSE Manager)
- Statutory bodies such as Police, HSE, etc.

Any other person with interest must obtain authority from the Chief Information Officer to view recorded footage, providing reasons and justification.

Any persons whose images are recorded have a right to view those images, and to be provided with a copy of those images, within one month of making a written Subject Access Request. Availability of images will be subject to the retention period. Employees making such a request should do so in writing, providing the relevant time and date of the image, so that they may be easily identifiable. The request should be made to dataprotection@ballyvesey.com or by writing to the GDPR Steering Committee, Ballyvesey Group, 607 Antrim Road, Mallusk, Newtownabbey, BT36 4RF.

5. EMPLOYEES

As stated, the primary uses of CCTV are to assist in the Protection and Safety of Persons and Property, Prevention or Detection of Criminal Offences and Defence of Legal Claims. However, when CCTV is installed in a workplace, it is likely to capture pictures of employees and workers.

In accordance with the principle at 3(f) above, CCTV evidence may be used as part of an employee investigation where, in the reasonable belief of management, that there may have been misconduct, or a breach of Health and Safety. In such cases the footage must be requested by the Human Resources Manager.

Where footage is used in disciplinary proceedings, it will be retained for a further period of up to five years. The employee will be permitted to see and respond to the images, in addition to their right to request a copy, which will be provided within one month.

Under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

6. NON-EMPLOYEES

Where an incident involves a visitor under the instruction of another employer (third party), the relevant employer will be informed of the details. Although the third party may be made aware that there is recorded evidence in the form of CCTV, they cannot be provided with a copy of the footage. A copy of the recorded material can only be requested by the subject themselves. However, the footage can be “viewed only” by the third party by either visiting our premises, or our representative meeting the third party to provide “viewing only” on a portable device.

As with employees, non-employees, whether under instruction of another employer or not should also note: Under appropriate circumstances the footage may be provided to Police (or other Competent Authority) with the intention to prosecute for criminal offences. In defence of legal claims, or in pursuance of civil recovery, footage may also be provided to our legal representatives with the intention of providing evidence before the courts.

7. COMPLAINTS

Complaints about the operation of the CCTV system should be addressed initially to dataprotection@ballyvesey.com or by writing to the GDPR Steering Committee, Ballyvesey Group, 607 Antrim Road, Mallusk, Newtownabbey, BT36 4RF.

8. MONITORING AND REVIEW

This policy will be regularly reviewed, or sooner if there is a policy need or legislative change.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the GDPR Steering Committee.