

Policy Statement

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Power System Services Ltd. The system comprises a number of fixed and dome cameras located around the company site. The CCTV system on Power System Services Ltd premises are regulated in accordance with the Data Protection Act 2018. The System is wholly owned by the Company.

Power System Services Ltd will treat the System, all information, documents and data images obtained and used, as data which may be deemed personal data requiring protection under the Acts.

It is intended that the CCTV cameras will be used to capture images of intruders or individuals damaging property or removing goods without authorization, production, accidents/incidents of health, safety, environmental, quality and disciplinary nature and release this information to and at the request of law enforcement.

The recorded images and footage shall be stored on computer data which is fully encrypted and will only be released to third parties for use in the investigation of a specific crime or incident specified, with the written authority of legal agencies. Files containing personal data will never be released to the media or other third parties for any purpose that is not permitted under the policy without the data subjects' consent.

The planning and operation of the System has been designed to ensure that it provides maximum effectiveness and efficiency insofar as is reasonably practicable, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Information captured as a result of the use of the system will not be used for any commercial purposes.

Purposes of CCTV

The CCTV system is operated on Power System Services Ltd premises for the safety and security of the people we support, our staff, buildings, information located or stored on the premises, and assets. Review of the system and collection of evidence may be taken in following circumstances:

- Investigation of security incidents both of breaches from internal and external sources, including and not limited to: theft, breaking & entering, bribery, malpractice/misuse of data and equipment.
- Damage/vandalism of property owned by the company and its employees on the premises.
- Investigation of health and safety incidents/accidents.
- Investigation of environmental incidents.
- Investigation of incidents pertaining to physical violence and aggression.

- Investigation following disciplinary proceedings in relation to our disciplinary procedures.
- Monitoring of production and attendance.

In exceptional circumstances, where it is considered appropriate, the CCTV system may be used to visually monitor the health and/or behaviour of people we support. Images will not be captured, but the health and/or behaviour of the individual person will be visually monitored. Consent for this purpose will be sought beforehand from the person themselves.

Purpose Limitation

The CCTV system will not interfere with the privacy of the employee or staff and will only be present in workplace areas and the outside premises; rights afforded in welfare facilities will in no way be affected under any circumstances.

Control

The CCTV system of Power System Services' will be controlled by the managing director and managers appointed as 'Data Controllers'. The system feeds into a database in the server room. This room is locked at all times with the access key stored in the accounts office. There is no monitor in the server room or continual feed of the system in that room; remote access is granted to the Managing Director and Data Controllers only. Continual monitoring is permitted on their personal display screens but copies or recordings of data must never be released to any persons without official authorisation (discussed further below).

Summary Description & Technical Specifications for the CCTV System

The CCTV system is a conventional static system. It records digital images and is equipped with motion detection. It records any movement detected by the cameras in the area under surveillance, together with time, date and location. All cameras operate 24 hours a day and 7 times a week. The image quality in most cases allows identification of those in the camera's area of coverage. The cameras are all fixed (there are no pan-tilt-and-zoom cameras), and thus, they cannot be used by operators to zoom in on a target or follow individuals around.

Power System Services Ltd does not use high-tech or intelligent video-surveillance technology, does not interconnect our system with other systems, and does not use covert surveillance, sound recording, or 'talking' CCTV.

Siting of Cameras

It is essential that CCTV equipment is sited in such a way that it only monitors those areas intended to be covered by the equipment. If it is not possible to restrict coverage, the owner of a property or space being overlooked should be consulted. If cameras are adjustable, this should be restricted in such a way that it is not possible to manipulate them to overlook areas not intended to be covered.

 <p>POWER SYSTEM SERVICES</p>	<h2>CCTV In the Workplace Policy</h2>	Rev: 01 Date: Dec 2019 Review: Dec 2020
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Signage

It is essential that legible CCTV Recording in Use signs are displayed in a prominent place where they will be clearly seen by staff, people supported by Power System Services Ltd, and the public. The signs should contain the following information:

- Identify Power System Services Ltd as responsible for the surveillance.
- Purpose of the surveillance.
- Contact details.
- The image of a camera.

Quality of the Images from CCTV

It is important that the images produced by the equipment are as clear as possible in order that they are effective for the purpose/s for which they are intended. The equipment and recording media should be maintained on a regular basis to ensure the quality of the images is upheld.

Retaining Information & Processing Images

It is important that images are not retained for longer than is considered necessary for the purposes for which they were processed. Therefore, unless the images are required for evidential purposes in investigation proceedings, they will not be retained beyond a maximum of 31 days.

In order to protect the security of the CCTV system, a number of technical and organisational measures have been put in place, including administrative measures which include the obligation of all outsourced personnel having access to the system (including those maintaining the equipment and the systems) being individually security cleared. All staff, including outside contractors must sign non-disclosure and confidentiality agreements. Access rights to users are granted only to those where it is strictly necessary for them to carry out their work; only the Managing Director and Data Controllers are granted authority to allow access rights.

Third-Party Access to the Images

It is important that access to, and disclosure of images to third parties are strictly controlled and documented. This is to ensure that the rights of the individual are maintained, and that the chain of evidence remains intact should the images be required for evidential purposes. Access to these images will normally be through the following: Court Order for Discovery, Freedom of Information access request, or a Data Protection access request. Only in exceptional circumstances may images be disclosed to those carrying out a formal internal investigation or disciplinary procedure, where it can reasonably be expected that the disclosure of the images may help the investigation or prosecution of a sufficiently serious disciplinary offence or a criminal offence.

Subject Access Requests

Under Data Protection legislation, an individual has the right to view any personal information held about them by a Data Controller. All requests should be made in writing to the Managing Director, Paul Beauchamp. The following information should be logged where access is provided:

- Record the reason for disclosure.
- Record the details of the image disclosed i.e. the date, time and location of the image.
- Record who was present when the images were disclosed.
- Record whether any images were disguised/blurred to prevent identification of individuals other than the data subject.

If it is not possible to disguise the images, an external company may be contracted to facilitate this. This will need to be recorded. Requests will not be complied with where there are insufficient details supplied relating to the date and time of the recording.

Correspondence is to be sent to the requester advising them of this. If the data subject wishes to view the images on site, as opposed to a copy being sent, the viewing should take place in a closed office with only the relevant individuals present.

Power System Services Ltd reserve the right to charge for any hard copies produced upon request; a surcharge of up to £10.00 per copy requested may be charged for all editing and processing costs.

Access Requests from Legal Authority

In line with the Data Protection Act, legal/enforcing authorities are entitled to view personal information about individuals, if it is for the following purposes:

- For the prevention or detection of crime.
- For the apprehension or prosecution of offenders.
- When it is required urgently to prevent injury or other damage to the health of a person, or serious loss of or damage to property.
- When it is required by, or under any enactment, or by a rule of law or order of a Court.

Requests must be made in writing or on an official record form from the legal or enforcing authority.

P. Beauchamp:
Managing Director



Date: 3rd December 2019