

Class One Driving

CCTV & Vehicle Monitoring Systems Policy



Introduction

The Company does not operate C.C.T.V in its premises. The Company has installed a comprehensive dash cam system in the cabs of Company owned vehicles for the principal purposes of preventing and detecting crime and for insurance purposes

The following are the reasons for installing CCTV on the company's premises;

- Provide a safer environment for staff
- Provide recordings to permit detection and identification of intruders
- Assist in determining the cause of accidents for insurance purposes
- Ensure compliance of health and safety and other company procedures.

Scope

The scope of this policy is to ensure that the use of CCTV/Dash Cam surveillance is within the parameters of data protection laws and consistent with the company's obligation of respect for individuals' privacy. Please note that this policy does not form part of your employment contract.

This policy must be read in line with the company's Data Protection Policy, Privacy Statement and Schedule. The company will comply with GDPR requirements and personal data will be retained only for as long as necessary. Please refer to the Schedule about information the company collects and holds. This also provides details on why the company collects the information, and how the information is used and shared.

System

The CCTV monitoring system will be operational twenty four hours a day throughout the year. Staff will be made aware of the presence of cameras by clearly visible signage. To ensure privacy, the cameras are prevented from focusing on any specific work station, instead they will generally cover the entire production area. Where it is not possible to prevent the cameras from dwelling on such areas, this will be clearly signposted. The recording from the CCTV cameras will be stored in the office safe. Access to the recording is strictly limited to the Directors and those Managers who require access, following the consent of the Directors, in order to achieve the purposes of using the equipment.

Handling of images and information within the Control Rooms will be done in accordance with the Data Protection Act 1998 and GDPR. CCTV images which evidence any behaviour, which cannot reasonably be ignored, may be used for staff disciplinary purposes.

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Although every reasonable effort has been made in the planning and design of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that the system will detect every incident taking place within the areas of coverage.

Where requests from the Police or other such agencies, for access to images for the purposes of a specific enquiry such as crime by a third party, it will not be denied.

All requests for disclosure and access to images shall 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 shall be recorded.

The areas covered are;

Not applicable at Class One Driving Ltd

Covert Monitoring

Covert monitoring will not be carried out unless in exceptional circumstances. In order to demonstrate the justification behind the use of covert recording equipment, the company shall carry out an impact assessment.

Circumstances where covert monitoring may be considered include; where there are grounds for suspecting criminal activity or equivalent malpractice, where notifying the individuals about the monitoring would prejudice its prevention or detection. Where covert monitoring is approved, it must be strictly targeted at obtaining evidence within a set timeframe and must cease once the investigation is complete.

Vehicle Tracking

Where employees drive company lorries, the Company reserves the right to install monitoring devices such as satellite tracking and in-vehicle camera systems. Such devices may record or transmit images or information such as the location of the lorry, the distance it has covered, its speed, related information about the user's driving habits, individuals present in the vehicle, accidents or incidents, etc. The employee will be advised if a monitoring device has been installed in their company vehicle and will also be advised of the nature of the monitoring that will take place.

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.

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Data Retention

CCTV/Dashcam images that are held on the hard drive of a PC or server or on removable media such as CDs shall be deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. The only exception to retention of such data will be where a law enforcement agency is investigating a crime and in all such instances the images shall be retained as long as necessary.

Requests and Complaints

Individuals have the right to request to receive a copy of any personal data the company may hold on them. This includes any CCTV images that specifically focus on the individual and where the individual is clearly identifiable. Such requests must detail out specific information sought including date, time and camera recording their image and must be made in accordance to the Data Protection Policy. The Data Protection Officer will review the request to ensure there are no concerns around third party privacy, or that the data is not being used for prevention or detection of crime or the apprehension or prosecution of offenders. In such instances, the company will advise the employee accordingly. If the request is valid and permissible, the company shall provide the individual with the data sought within one month of confirming that such a request is permissible.

It is also recognised that staff may have concerns or complaints in respect to the operation of the CCTV Surveillance System. Any concerns or complaints should, in the first instance, be addressed to Sue Doughty