



CCTV Policy

The monitoring, recording, holding and processing of images of distinguishable individuals constitutes personal data as defined by the Data Protection Act (1998). This Policy is intended to ensure that in its use of Closed Circuit Television (CCTV) Scapa is fully compliant with the requirements of the Data Protection Act (1998), with related legislation and with the CCTV Code of Practice published by the Office of the Information Commissioner.

1. Responsibility

- Responsibility for implementing Scapa's Data Protection Policy as it relates to CCTV is held by the Group Director of HR
- Responsibility for managing Scapa's CCTV network and for monitoring implementation of this Policy is held by the Group Head of EHS and his appointed deputy.
- Responsibility for the day-to-day management and use of authorised CCTV systems is delegated by the Group Director of HR to appropriately designated staff.

2. Approval and Registration

Any new requests for installation of CCTV on Scapa premises will be addressed by the Group Head of EHS who has responsibility for maintaining a listing of the location of cameras and associated equipment. The Group Head of EHS will pass all such requests to the group HR Director for approval.

3. Purpose

CCTV systems are employed at Scapa only for the following specific purposes:

- to deter and detect crime, including theft and criminal damage
- to enhance the safety and well-being of staff, visitors and members of the public
- to assist in the overall management of buildings and facilities

Where, in carrying out these purposes, images are obtained of persons committing acts of an illegal nature and/or acts which breach Scapa's policies and procedures, these may be used as evidence.

4. Location and sites

Scapa's installation of CCTV systems must comply with the following guidelines:

- cameras are not hidden from view and are sited in such a way as to ensure that they only monitor spaces intended to be covered
- signs are displayed so that everyone is aware that they are entering a zone that is covered by surveillance equipment
- signs indicate the purposes for which cameras are installed and contact details for the local security team

5. Processing data

Access to, and disclosure of, images is restricted and carefully controlled, in order to safeguard the rights of individuals and also to ensure that evidence remains intact should the images be required for evidential purposes. The Group Head of EHS must:

- restrict access to those staff who need to have access to recorded images for the purpose(s) for which the system was installed
- make practical arrangements for ensuring that recorded images are viewed only by authorised staff, via a nominated PC in a secure and confidential location
- ensure that the CCTV log records of all processing of data
- Provide a list to the Group HR Director of staff who have access to recorded images on a monthly basis

6. Access

Arrangements for access to CCTV images are covered by Scapa's Data Protection Policy. Data Subjects who seek access to their personal data must complete a standard Subject Access Request form as outlined in that policy. The Group Director HR must ensure that:

- all staff are made aware of the rights of data subjects to access images of themselves and the conditions under which access may be granted to them and to third parties
- all subject access requests are dealt with by Scapa's Data Protection Manager (HR Manager) in consultation with the other senior members of staff as appropriate
- images are not to be disclosed to third parties without the permission of the Group Director of HR or their deputy
- all requests from the police for access or disclosure are dealt with according to procedures detailed in the Data Protection Policy

7. Covert monitoring

Covert use of CCTV can only take place on the documented authorisation of the Group Director of HR and the Group Operations Director. For these circumstances to occur, there must be reasonable cause to suspect that unauthorised or illegal activity is taking place, or is about to take place, or that a breach of Scapa policies and procedures is taking place, or is about to take place. Covert monitoring will be undertaken only for a limited and reasonable period of time consistent with the documented objectives. All decisions relating to the use of covert CCTV will be fully recorded.

8. Documentation

The CCTV system must have associated documentation listing the purposes for which the system has been installed and sited in that particular location. Documentation must also include details relating to means of access to images, extent of access, and must log requests to view, viewings themselves, any outcomes, repairs to cameras or re-siting of cameras. Those authorised to view images must provide a signature agreeing to abide by this Policy

The Group Head of EHS will also ensure completion and regular updating of the CCTV checklist as advised by the Information Commissioner.

9. Monitoring and review

This CCTV Policy will be kept under continuous review. Any questions about its interpretation or operation should be referred to the Group Director of HR.