FLANNERY®

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CCTV POLICY

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1st June 2024

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1. Introduction

P. Flannery Plant Hire (Oval) Ltd uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to Flannery business premises, such as clients, customers, contractors and suppliers, and to protect the Company's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 1998 and the CCTV Code of Practice.

Flannery's CCTV facility records images only, there is no audio recording i.e. conversations are not recorded on CCTV.

2. Purposes of CCTV

The purposes of Flannery installing and using CCTV systems include:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of P Flannery Plant Hire (Oval) Ltd 's business premises.
- To ensure that health and safety rules and Company procedures are being complied with.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence.
- To promote productivity and efficiency.
- To ensure all regulations are met to meet Pearson and Vue and CITB Standards.
- Audio recording will be taken and retained for the ITC centre.
- Furthermore, to protect individuals using Flannery as a training centre.

3. Recording and Retention of Images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above.
Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images. Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.
As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than 72 days. Once a hard drive has reached the end of its use, it will be erased prior to disposal. Audio recording will be taken and retained for the ITC centre.

4. Access to and Disclosure of Images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they

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were originally collected.

The images that are filmed, are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other staff will not have access when viewing is occurring. If media, on which images are recorded, are removed for viewing purposes, this will be documented. Images and recordings will only be disclosed to third parties in accordance with the Company's policies which state:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Managers involved with the Company's disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

Flannery's Managing Director is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.
All requests for disclosure and access to images will 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 will be recorded.

5. Individuals' access rights

Under the Data Protection Act 1998, individuals have the right to request copies of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to the Company's Managing Director. The Company reserves the right to charge you a fee of £10.00 for the supply of the images requested. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located, and your identity can be established as the person in the images. The Company will respond promptly and in any case within 30 calendar days of receiving the request.
The Company will always check the identity of the member of staff making the request before processing it.

The Company's Director will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention

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or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

6. Covert recording

The Company will only undertake covert recording with the written authorisation of the Managing Director where there is good cause to suspect that criminal activity or equivalent malpractice is taking or is about to take place.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Covert monitoring may include both video and audio recording. Information obtained through this monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

7. Implementation and Review

Copies of the policy will be provided to all relevant individuals and the receipt acknowledgment by each person shall be maintained. Flannery will communicate, implement and maintain this policy at all times with the organisation.

This policy is effective from 1st June 2024 and will be reviewed and updated annually. Overall implementation of this policy lies with Patrick Flannery (Managing Director) and Aaron Davis (Safety and Skills Director). Any queries relating to this policy should be directed to Aaron Davis in the first instance.

Patrick Flannery
Managing Director

1st June 2024

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