

CCTV policy

Introduction

Textile Recycling International uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to Textile Recycling International's business premises, such as clients, customers, contractors and suppliers, and to protect Textile Recycling International's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998 and the CCTV Code of Practice.

Textile Recycling International's CCTV facility records images and audio on some cameras.

Purposes of CCTV

The purposes of Textile Recycling International 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 Textile Recycling International'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 assist in the event of accident or incident that may proceed to legal action/defence regarding Textile Recycling International

Location of cameras

Cameras are located at strategic points throughout Textile Recycling International's business premises, principally in the factory and textile processing areas, goods in, goods out, entrance and exit points, reception and office areas and the carpark. Textile Recycling International has positioned the cameras so that they only cover communal or public areas on Textile Recycling International's business premises and they have been sited so that they provide clear images. No camera focuses, or will focus on toilets, shower facilities or changing rooms.

All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.

Appropriate signs are prominently displayed so that employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

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 system are deleted and overwritten on a recycling basis and, in any event, are not held for more than 3 weeks. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

CCTV is only stored for longer than 3 weeks in the event of an incident, accident or injury. The data is erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 3 months. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

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 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 employees will not have access when viewing is occurring.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- 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.
- Line managers involved with Company 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



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offenders).

The managers and directors of Textile Recycling International are the only people who are permitted to authorise disclosure of images to external third parties such as law enforcement agencies but must inform the Group Head of IT prior to handover.

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.

Individuals' access rights

Under the Data Protection Act 1998, individuals have the right on request to receive a copy of the personal data that Textile Recycling International 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 Textile Recycling International's Data Protection Officer and Textile Recycling International 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. Textile Recycling International will respond promptly and in any case within 40 calendar days of receiving the request.

Textile Recycling International will always check the identity of the employee making the request before processing it.

The Data Protection Officer 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 Textile Recycling International is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Covert recording

Textile Recycling International will only undertake covert recording with the written authorisation of members of the Board where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection.

Covert monitoring may include both video and audio recording.



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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 particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert 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 Textile Recycling International cannot reasonably be expected to ignore.

Staff training

Textile Recycling International will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the Data Protection Act 1998 with regard to that system.

Implementation

Textile Recycling International's Data Protection Officer is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of Textile Recycling International's use of CCTV. Any complaints or enquiries about the operation of Textile Recycling International's CCTV system should be addressed to them.