Platinum

Park House ◦ Hookstone Park ◦ Harrogate ◦ HG2 7DB
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Platinum is a trading name of Platinum Print Limited Registered Office as above. Company Reg. No. 3879483

CCTV Policy

1: Introduction

Platinum Print Ltd is fully committed to the safety of its staff, visitors and data security of both its own data and that of its clients. To this extent we have invested in the security of our buildings both internally and externally.

1. The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Platinum Print Ltd. Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 2018 and the European Union General Data Protection Regulation 2016 (EU GDPR).

The person ultimately responsible for data protection within Platinum Print Ltd is the Data Controller and ultimately the CEO.

The system comprises a number of fixed cameras located both internally and externally around the site on Hookstone Park HG2 7DB.
All cameras maybe monitored and are only available for use by approved members of staff. With the exception of one screen in the production managers office.

The CCTV system is owned by the Platinum Print Ltd and will be subject to review on an annual basis.

2: The objectives of the CCTV system are:

1. To protect the Platinum Print Ltd buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption and theft
2. To increase the personal safety of staff and reduce the fear of intimidation and crime.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on the Platinum Print Ltd site.
5. To protect members of the public and private property.
6. To assist in the usage and management of the Platinum Print Ltd building on a day-to-day basis.

3: Statement of Intent

1. The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act 2018, GDPR and the Commissioner's Code of Practice.
2. Platinum Print Ltd will comply with the Data Protection Act 2018 and GDPR whether it be information, recordings and downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within the Platinum Print Ltd buildings, the car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the Platinum Print Ltd, together with its visitors.
4. The static cameras will not focus on private homes, gardens and other areas of private property.

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5. Unless an immediate response to events is required, staff will not direct cameras at an individual, their property or a specific group of individuals, without an authorisation from the Data Controller or CEO being obtained.
6. Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the Police.
7. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.
8. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the Platinum Print Ltd CCTV.

4: Operation of the System

The system will be administered and managed by the Data Controller, in accordance with the principles and objectives expressed in this Policy.

1. The day today management will be the responsibility of the ICT Manager.
2. The CCTV system will be operated 24 hours each day, every day of the year.

5: CCTV System

1. The ICT Manager will check and confirm the efficiency of the system on a monthly basis and in particular that the equipment is properly recording and that cameras are functional.
2. Access to the CCTV will be strictly limited to the members of staff approved by the Data Controller.
3. Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
4. The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Data Controller. If permission is granted by the Data Controller, the member of the public must be accompanied throughout the visit by a member of staff.
5. Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.
6. Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the ICT Manager
7. In the event of an emergency which requires an immediate contact with an emergency service to be contacted by a member of staff. The emergency procedures identified in the Health and Safety Policy will be adhered too.

6: Liaison

Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

7. Monitoring Procedures

1. Camera surveillance may be maintained at all times for monitoring purposes.

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2. Out of hours the system can be connected to an external person, limited to the Data Controller, a Director and CEO In the event of a security alarm activation Platinum Print Ltd's Alarm Monitoring centre may view the CCTV

8: Video Download Procedures

1. Recordings may be viewed by the police and authorised officers for the prevention and detection of crime. Permission to do this will be given from the Data Controller.
2. A record will be maintained of the release of downloads to the police or other authorised applicants. A register will be available for this purpose and will be kept by the Data Controller.
3. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under section 29 of the Data Protection Act 2018.
4. Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disk remains the property of the Platinum Print Ltd, and both the disk and information contained on it are to be treated in accordance with this Policy. Platinum Print Ltd also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.
5. Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the CEO. In these circumstances downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100.00 can be charged in such circumstances.

9: Breaches of the Policy (including breaches of security)

1. Any breach of this Policy by Platinum Print Ltd staff will be initially investigated by the Data Controller, in order for her to take the appropriate disciplinary action.
2. Any serious breach of the Policy may be classed as gross misconduct and result in instant dismissal. Legal action may also be taken against that individual or group of individuals.

10: Assessment of the Scheme and CCTV Usage Policy

Performance monitoring, including random operating checks, may be carried out by the approved persons.

11: Complaints

1. Any complaints about the Platinum Print Ltd's CCTV system should be addressed to the Data Controller
2. Complaints will be investigated in accordance with Section 9 of this Policy

12: Access by the Data Subject

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1. The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the CEO

13: Public Information

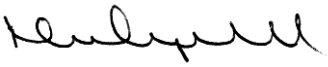
Copies of this Policy will be available to the public, by making a request to the Data Controller a copy of this Policy will be located on the Platinum Print Ltd website, Intranet and Platinum Print Ltd's document server.

14. System Maintenance and Monitoring

1. The system will be maintained in accordance with the Data Protection Act 2018 and GDPR
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).
3. The companies will be selected using the Platinum Print Ltd's ISO27001 Supplier accreditation process
4. It will be the responsibility of ICT Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.
5. It will be the responsibility of ICTManager to arrange regular system reviews with the maintaining company.

15: Summary of Key Points

1. This CCTV Usage Policy will be reviewed on an annual basis.
2. The CCTV system is owned and operated by the Platinum Print Ltd.
3. The CCTV system cannot be accessed by visitors/ members of the public except by prior arrangement with the Data Controller and with good reason.
4. Copies of downloads may only be viewed by authorised staff and the police.
5. Liaison meetings may be held with the police and other bodies.
6. Copies required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
7. Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.
8. Any breaches of this Policy will be investigated by the Data Controller. Serious breaches may result in dismissal and Legal action.
9. Breaches of the Policy and recommendations will be reported to the CEO.
10. The system will be maintained on a regular basis by an approved contractor.

Signed by  Financial Director: Date: 9th December 2020

I have read, understood and will adhere to the above policy

Employee signature Date: