

ENGINEERED SYSTEMS (ELECTRICAL) LTD
Unit 1 Waterside Industrial Park, Waterside Road,
Leeds, LS10 1RW

CCTV POLICY

PURPOSE:

ENGINEERED SYSTEMS (ELECTRICAL) LTD has in place a CCTV surveillance system ("CCTV") across its premises. CCTV images are monitored and recorded in strict accordance with this policy. We have considered the rights of employees, potential customers and other parties, bearing in mind that monitoring via CCTV may only be undertaken if there is a lawful basis for doing so. We recognize that any personal data collected must be used and kept only to fulfil its original purpose, and GDPR-compliant Notices must be prominently displayed.

SCOPE:

This policy details the purpose, use and management of the CCTV and details the procedures to be followed in order to ensure that ENGINEERED SYSTEMS (ELECTRICAL) LTD complies with relevant legislation and the current Information Commissioner's Office Code of Practice and has due regard to the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) and any subsequent data protection legislation.

CONTROL MEASURES:

- ENGINEERED SYSTEMS (ELECTRICAL) LTD are responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- The CCTV system operates across ENGINEERED SYSTEMS (ELECTRICAL) LTD's premises. Details of the number of cameras can be found at the ESE Server room.
- Signs are placed at multiple locations in order to inform staff, visitors and members of the public that CCTV is in operation.
- The HSEQ Manager is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- Any proposed new CCTV installation is subject to a Privacy Impact Assessment.

PURPOSES OF THE CCTV SYSTEM:

The principal purposes of ENGINEERED SYSTEMS (ELECTRICAL) LTD's CCTV system are as follows:

- for the prevention, reduction, detection and investigation of crime and other incidents.
- to ensure the safety of staff and visitors.
- to assist in the investigation of suspected breaches of ENGINEERED SYSTEMS (ELECTRICAL) LTD's rules by staff.
- the monitoring and enforcement of traffic related matters.

The CCTV system will be used to observe ENGINEERED SYSTEMS (ELECTRICAL) LTD's areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed. ENGINEERED SYSTEMS (ELECTRICAL) LTD's seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

MONITORING AND RECORDING:

Cameras are monitored in the server room, which is a secure area, staffed 8.5 hours a day. Images are recorded centrally on the server and are viewable in the server room from a dedicated PC Monitor. Additional staff may be authorized by Directors to monitor cameras sited within their own areas of responsibility on a view only basis. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate. All images recorded by the CCTV System remain the property and copyright of the ENGINEERED SYSTEMS (ELECTRICAL) LTD.

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Covert cameras are not normally used and will be restricted to rare occasions when a series of criminal acts have taken place within a particular area that is not otherwise installed with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of a director will be sought before the installation of any covert cameras. All other physical methods of prevention must be exhausted prior to the use of covert recording. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorized activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

COMPLIANCE WITH DATA PROTECTION LEGISLATION:

In its administration of its CCTV system, ENGINEERED SYSTEMS (ELECTRICAL) LTD complies with the Data Protection Act 2018. Due regard is given to the data protection principles embodied in the Data Protection Act. Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:

- processed lawfully, fairly, in a transparent manner and in accordance with the rights of individuals
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date and held no longer than necessary for the particular purpose.
- kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data is processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures
- not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection

APPLICATIONS FOR DISCLOSURE OF IMAGES/APPLICATIONS BY INDIVIDUAL DATA SUBJECTS:

Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing to a director. In order to locate the images on ENGINEERED SYSTEMS (ELECTRICAL) LTD's system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified. Where ENGINEERED SYSTEMS (ELECTRICAL) LTD is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES:

A request for images made by a third party should be made in writing to a director.

In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Such disclosures will be made at the discretion of a director, with reference to relevant legislation and where necessary, following advice from ENGINEERED SYSTEMS (ELECTRICAL) LTD's Governance and Information Compliance Team. Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the director may provide access to CCTV images for use in staff disciplinary cases. A record of any disclosure made under this policy will be held on the CCTV management system, itemizing the date, time, camera, requestor, authorizer and reason for the disclosure.

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RETENTION OF IMAGES:

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 7 days from the date of recording. Images will be automatically overwritten after this point. Where an image is required to be held in excess of the retention period, the director or their nominated deputy will be responsible for authorizing such a request. Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted. Access to retained CCTV images is restricted to a director and other persons as required and as authorized by a director.

COMPLAINTS PROCEDURE:

Complaints concerning ENGINEERED SYSTEMS (ELECTRICAL) LTD's use of its CCTV system, or the disclosure of CCTV images should be made in writing to Michael Keith. All appeals against the decision of Michael Keith should be made in writing to the HR Department


MONITORING COMPLIANCE:

All staff involved in the operation of ENGINEERED SYSTEMS (ELECTRICAL) LTD's CCTV System will be made aware of this policy and will only be authorized to use the CCTV System in a way that is consistent with the purposes and procedures contained herein.

CONSEQUENCES OF NON-COMPLIANCE:

- Where an employee commits a clear breach of company rules relating to this policy, action will be taken under our disciplinary procedures as appropriate.

Signed By the Executive Responsible for CCTV:



Michael Keith
Managing Director
Date: 28th August 2025