

CCTV Policy



TATA CHEMICALS EUROPE

Our Aim

The aim of this policy is to regulate the management and operation of the Closed Circuit Television System (**CCTV System**) at sites owned or occupied by Tata Chemicals Europe Limited, British Salt Limited and/or any of their subsidiaries (**Company**). It also serves as a notice and a guide to data subjects (which includes employees, contractors, tenants, visitors to premises owned or occupied by the Company and members of the public) regarding the rights in relation to personal data recorded via the CCTV system. The CCTV system is owned and managed by Tata Chemicals Europe Limited who act as the Data Controller.

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Introduction

The Company uses the CCTV system across its UK sites. This policy details the purpose, use and management of the CCTV system by the Company and details the procedures to be followed in order to ensure that the Company complies with relevant legislation and the current Information Commissioner's Office CCTV Code of Practice.

The Company will have due regard to the Data Protection Act 2018, the UK 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. Although not a relevant authority, the Company will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.

This policy is based upon guidance issued by the Information Commissioner's Office, 'In the picture: A data protection code of practice for surveillance cameras and personal information' (**Information Commissioner's Guidance**).

This policy and the procedures therein detailed, applies to all of the Company's CCTV systems including, where appropriate, Automatic Number Plate Recognition (**ANPR**), Licence Plate Recognition Cameras (**LPR**), body worn cameras, webcams, covert installations and any other system capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.



This policy should be read in conjunction with the Company's Data Protection Policy.

CCTV System overview

The CCTV system is owned and managed by Tata Chemicals Europe Limited and its appointed agents. Under current data protection legislation Tata Chemicals Europe Limited is the 'data controller' for the images produced by the CCTV System and is registered with the Information Commissioner's Office with registration number is ZA467516. The CCTV System operates to meet the requirements of the Data Protection Act and the Information Commissioner's guidance.

¹ <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

The Head of IT is 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 the Company's administrative and manufacturing sites. Signs are placed at all pedestrian and vehicular entrances in order to inform staff, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by Tata Chemicals Europe Limited and a 24 hour contact number and email address for the TCE IT Helpdesk is included.

The Head of IT is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

Cameras are sited to ensure that they cover Company premises as far as is possible. Cameras are installed throughout the Company's sites including roadways, car parks, buildings (both internally and externally) and externally in vulnerable public facing areas.

Cameras are not sited to focus on private residential areas.

The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Further information regarding the number and location of CCTV cameras is available on request from the Head of IT.

Purposes of the CCTV system

The principal purposes of the Company's CCTV system are as follows:

- for the prevention, reduction, detection and investigation of crime and other security incidents;
- to ensure the safety of staff, contractors and visitors;
- to assist in the investigation of suspected breaches of Company regulations by staff and



- the monitoring and enforcement of traffic related matters.

The CCTV system will be used to observe the Company's sites and areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed. The Company 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 by authorised members of staff. Images are recorded centrally on servers located securely in the Company's Data Centre and are viewable by authorised staff. Additional staff may be authorised by the Head of IT 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 daily 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 Tata Chemicals Europe Limited.

The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Head of IT will be sought before the installation of any covert cameras. The Head of IT should be satisfied that all other physical methods of prevention have been 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 is reasonable grounds to suspect that illegal or unauthorised 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, the Company complies with UK GDPR and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in legislation. These principles require that personal data shall be:

- processed lawfully, fairly and in a transparent manner;
- 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;



- 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 are processed; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Company ensures it is responsible for, and able to demonstrate compliance with GDPR

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 the Legal Manager in accordance with the Company's Data Protection Policy.

In order to locate the images on the Company'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 the Company 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 the Legal Manager. 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 the Legal Manager, with reference to relevant legislation and where necessary, following advice from the Company's HR and IT Teams.

Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Head of IT 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, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.



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 14 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 referred to above the Legal Manager will be responsible for authorising 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 the Head of IT and other persons as required and as authorised by the Head of IT.

Complaints procedure

Complaints concerning the Company's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Legal Manager in the first instance.

Where an individual has a concern regarding the Company's use of CCTV or a response from the Company to a concern raised, the Information Commissioners Office can provide further advice and guidance. Contact details can be found on the Information Commissioners Website <https://ico.org.uk/global/contact-us/>

Monitoring Compliance

All staff involved in the operation of the Company's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

Policy review

The Company's usage of CCTV and the content of this policy shall be reviewed annually by the Head of IT with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

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