

# CCTV Policy

## Background

Pioneer Design & Build Limited uses closed circuit television to (CCTV) images for the prevention, identification and reduction of crime. CCTV is also used to monitor Pioneer projects to provide a safe and secure environment for operatives, visitors and staff, and to prevent the loss or damage to property.

## Why?

CCTV surveillance is intended for the purposes of:

- Protecting the site, site facilities and property of those working on site both during site opening hours and out of hours
- Promoting the health & safety of everyone connected with the project
- Reducing any potential incidences of crime or anti-social behaviour (including theft and vandalism)
- Supporting the Police in order to deter and detect crime
- Assist in identifying, apprehending and prosecuting offenders

number of cameras on site will be determined by the size of site.

The CCTV system will be installed and operated by an external contractor.

The CCTV system is monitored from the Site Managers office as well as the CCTV installers monitoring station.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

The use of the CCTV system will be conducted in a professional, ethical and legal manner in a manner consistent with existing policies produced by Pioneer Design & Build Limited.

## Justification for the Use of CCTV

The use of CCTV is to control the perimeter, site accommodation, storage units as well as plant/materials that are owned by Pioneer Design and Build Limited as well as those owned by others working on Pioneer projects.

The system is intended to capture images of intruders or of individuals damaging property or removing plant or materials without authorisation or anti-social behaviour.

## Data Protection

Where new CCTV systems are installed, Pioneer will carry out a Data Protection Impact Assessment identifying risks related to the installation and ensuring full data compliance with data protection legislation. This may require the need for consultation with employees, contractors and local residents.

## Location of Cameras

Cameras will only be positioned so they capture image relevant to the purposes for which they have been installed and care will be taken to ensure that reasonable privacy expectations are not violated.

Pioneer Design and Build Limited and the CCTV installer will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. Pioneer Design and Build Limited and the CCTV installer will make every effort to position CCTV cameras so that their coverage is restricted to the construction site and not the external surroundings.

CCTV will not be used in any of the site accommodation.

Cameras that are placed to monitor the perimeter of the site are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV monitoring and recording may include:

- The perimeter of the site
- Access and egress points
- Storage areas
- Compounds

There will be no covert surveillance.

A copy of this CCTV policy is available on request to all

Signs making any person aware that CCTV is in operation on a particular project will be displayed in prominent places and it will be covered in the site induction.



The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept.

Access will be restricted to authorised personnel only. Supervising and accessing the CCTV system is the responsibility of the Contract Manager. The Contract Manager may delegate this responsibility to another member of the site team.

In certain, exceptional circumstances, the recordings may need to be viewed by others in order to achieve the objectives set out above. When CCTV recordings are viewed, access will be limited to authorised individuals on a need to know basis.

Any files or tapes are stored by the CCTV installer.

#### Access

Recorded footage and monitoring will be stored securely, access will be managed. When authorised personnel aren't in the same room as the monitoring equipment, the room will be locked.

Access to the CCTV system and stored images will be via authorised personnel only.

When accessing images and recordings 2 members of Pioneer Design and Build Limited must be present. Records of access will be kept.

A record of the date of any disclosure request along with the details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to review the footage.

In relevant circumstances, CCTV footage may be accessed:

- By the Police where Pioneer Design and Build Limited are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by Police when a crime or a suspected crime has taken place
- To the HSE and/or any other statutory body;
- To individuals (or their legal representatives) subject to a court order;
- To Pioneer Design and Build insurers where the insurance company requires same in order to pursue a claim

## Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

Pioneer Design and Build Limited will respond to requests within 30 calendar days of receiving the request in line with Pioneer Design and Build Limited's right of access policy.

Pioneer Design and Build Limited reviews the right to refuse access to CCTV footage that would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

A record of the date of the disclosure along with the details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

In giving a person a copy of their data, Pioneer Design and Build Limited will provide a still/series of pictures, tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Where footage contains images relating to 3<sup>rd</sup> parties, Pioneer Design and Build Limited will take appropriate steps to mask and protect the identities of those individuals.

## Complaints

Complaints and enquiries about the operation of CCTV within the Pioneer Design and Build Limited site should be directed to the Managing Director in the 1<sup>st</sup> instance.

## Responsibilities

The Managing Director of Pioneer Design and Build Limited (or nominated deputy) will:

- Ensure the use of CCTV systems is implemented in accordance with the policy set down by Pioneer Design and Build Limited;
- Oversee and coordinate the use of CCTV monitoring for safety and security purposes within Pioneer Design and Build Limited projects;
- Ensure that all CCTV monitoring systems will be evaluated for compliance against this policy;
- Ensure that CCTV monitoring at Pioneer Design and Build Limited is consistent with the highest standards and protections;
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy;
- Maintain a record of access (e.g. access to a log) to or the release of tapes or any material recorded or stored in the system;
- Ensure that the perimeter view from fixed location cameras conforms to this policy both internally and externally;

- Co-operate with the operations Manager of Pioneer Design and Build Limited in reporting on the CCTV system in operation across all projects;
- Ensure external cameras are non-intrusive in terms of their positions and views of neighbours other land users around the area. It should comply with the principle of “Reasonable Expectation of Privacy”;
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only;
- Ensure that images recorded on tapes/DVDs/Digital Recordings are stored for a period of not longer than 30 days and are then erased unless part is required as part of a criminal investigation or court proceedings (criminal or civil);
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc... and not to monitor individual characteristics;
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas

This policy is fully endorsed by the Directors’ and is publically available.

