Corporate Architecture Limited

CCTV Policy

Next Review February 2025

1. INTRODUCTION

1.1 Corporate Architecture Limited ('the Company') use CCTV throughout our offices.

1.2 The location of our cameras are on our office site, Venari House, 1 Trimbush Way, Rockingham Road, Market Harborough, Leicestershire, LE16 7XY.

1.3 We carefully evaluate the justifications we have to continue using our current CCTV systems, and location of any new cameras and the proper use and disclosure of any footage gathered, in accordance with our obligations under the General Data Protection Regulation, guidance from the Information Commissioner, the guidance set out in the Home Office Surveillance Camera Code of Practice and other legal obligations.

2. PURPOSE OF CCTV

2.1 CCTV used on our premises was introduced to protect the people that use our sites (whether employees or staff of other businesses operating from our premises), the property used and stored on those sites, to secure the perimeter and limit access to site to authorised persons, and to ensure Company rules are followed. We believe that these purposes are to protect our legitimate interests, and also the vital interests of staff and other individuals to protect their health and safety, when they use or otherwise visit our sites.

2.2 Our CCTV systems are also used for the prevention of crime. In the event of any accident or incident, our CCTV footage may also be used for the investigation and prosecution of crime.

2.3 We have weighed up the introduction and retention of CCTV cameras with the potential for intrusion into an individual's privacy. This policy and our use of CCTV will try to balance the Company's justification for using CCTV cameras against the right of the individuals filmed to their privacy.

2.4 Our cameras are likely to collect footage of our staff, staff of other businesses using our premises, contractors, operatives, third party suppliers and partners and members of the general public.

2.5 We do not carry out covert recordings in any circumstances.

2.6 If our purposes for the use of CCTV and footage changes, we will publicise this change to the individuals affected (such as staff and visitors to our premises).

3. CCTV CODE OF PRACTICE

3.1 Before we position and use CCTV cameras, we will consider our purposes in doing so. We do not position our cameras in areas where it may be invasive of individual's privacy. For example, we do not use cameras within toilets or changing areas.

3.2 Rather, to forward our legitimate aims, we position cameras at entry and exit points of the building, and other strategic areas for security purposes. We believe that this is a proportionate step to ensure that filming of individuals is kept to a minimum and is less invasive, but still meets our purposes.

3.3 Location of CCTV and the footage gathered will be regularly reviewed in order to ensure that use of our systems remains proportionate, and not invasive.

3.4 Signage will indicate to staff and visitors that CCTV is being used, and individuals should be directed to the appropriate Privacy Notice (for staff or clients) for further information. Signage should be clearly visible, readable, identify the Company as the operator of the system, and include contact details.

3.5 Footage is kept securely. Only limited members of management staff and our IT provider have access to the CCTV footage. We permit access to management for the purpose of disciplinary investigations, to ensure the security of our staff and property. All authorised staff with access to the footage will receive specific training on GDPR under our Data Protection Policy and Privacy Notices.

3.6 No disclosure of CCTV footage will be made to any other third parties, unless for the purpose of seeking legal advice, to our insurers for the purpose of defending a claim, and/or the Police in the event of a potentially criminal incident.

3.7 Unauthorised use, access or disclosure of CCTV footage by staff will be dealt with under the Disciplinary Procedure, and may in some circumstances be referred to the Police.

3.8 We normally retain footage for 12 months, after which time it is securely destroyed. In the event of a third party disclosure, or the prospect of litigation in which the footage is likely to be relevant evidence, we may need to retain footage for longer than anticipated.

3.9 Access to the security camera screens, live action and recorded footage is limited, kept securely and only accessed via mobile devices.

3.10 We do not make automated decisions on the basis of CCTV footage we process.

4. PRIVACY IMPACT ASSESSMENT

4.1 The Company will review the positioning of our cameras and our use and storage of CCTV footage annually to ensure compliance with this Code of Conduct, our justifications remain the same, and that we are complying our legal obligations.

4.2 A privacy impact assessment considering our use of CCTV and footage will be produced each year, to consider the continuing impact on individual privacy and steps that could be taken to reduce any intrusiveness. From time to time, cameras may be relocated or removed, in order to ensure our continued compliance.

The privacy impact assessment will consider the following issues:

- Whether our justifications for processing footage are still accurate.
- Whether the location of our cameras meets our justifications.
- Whether the footage is kept appropriately secure, and our systems are being followed.
- Whether our retention period for footage is justified.
- Whether our systems for ensuring the security of the footage are working.
- Staff training on appropriate use of security footage.
- The privacy and rights of the individuals likely to appear in the footage.
- Whether our justifications can be met by means other than CCTV footage.
- Is our use of CCTV proportionate in light of the rights of the filmed individuals to privacy?
- Whether intrusion can be reduced, by measures such as non-continuous recording, or recording only at certain times, or changing the location of the cameras.
- Are individuals adequately informed of their rights before being filmed?
- Is our retention period proportionate?

4.3 Records made and information ascertained from CCTV footage which identifies third parties will be dealt with in accordance with the principles set out in our Staff and Client Privacy Notices, kept

secure and retained for 6 months, for the safety and security of company premises. This footage may be used as part of the disciplinary procedure. In certain circumstances, CCTV footage may need to be disclosed to the Police for the prevention or detection of crime.

5. PERSONAL DATA AND SENSITIVE PERSONAL DATA

5.1 Personal Data is any data (such as name, date of birth, or address) which can identify an individual.

5.2 Sensitive Personal Data includes data about a person's:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.
- Genetic and biometric data (for the purpose of uniquely identifying a person).
- Health.
- Sex life or sexual orientation

5.3 It is possible that in the course of recording footage through our CCTV cameras, we may end up processing Personal Data and Sensitive Personal Data about you. For example, you may wear religious iconography about your person which indicates your religious or philosophical beliefs.

5.4 We will seek your explicit consent to the processing and use of such footage at the end of this policy. We may be justified in processing Sensitive Personal Data about you through our footage, if you have made this data manifestly public.

5.5 We will endeavour to seek consent from visitors to our premises to our use of CCTV.

6 WHO SHOULD I CONTACT TO MAKE ENQUIRIES ABOUT CCTV?

6.1 Anyone wishing to make an enquiry about our use of CCTV cameras and footage should contact the Company via the email address: dpo@cal.design.

6.2 This policy will be publicised to staff and third parties via our website and staff handbook.

6.3 Requests for disclosure of CCTV footage must be made under the correct Privacy Notice (either for staff or third parties). Any such request must specify the right under the GDPR they are relying upon, and the details we need to find the required footage. For example, date, time, location of the place captured in the footage. Compliance with any such request will need to balance the right of the requesting individual to their personal data, and the rights of others who may appear in such footage.

6.4 Requests for footage may be satisfied by requiring the individual to view the footage under our supervision, rather than providing a copy of the footage.

6.5 Staff complaints about the usage of our CCTV footage should be made through the Grievance Procedure. Third party complaints should be made by email to dpo@cal.design.

6.6 There will be a right of complaint to the Information Commissioner to enforce any rights in relation to their personal data or sensitive personal data held on CCTV footage.

Richard Coppock
Director, Corporate Architecture Limited
Reviewed February 2024