

SITE CCTV POLICY

PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed-Circuit Television and its associated technology in the monitoring of both the internal and external environs of premises under the remit of Castings plc.

CAMERA LOCATIONS

The Company's primary objectives for the use of CCTV is to improve site security and Health and Safety.

SECURITY

Historically, the Company has suffered significant losses due to the theft of raw materials and patterns as well as material damage to barriers, gates and buildings. Site cameras view vehicle entrances onto the various parts of the site. The use of these cameras will offer both a deterrent and an opportunity to record criminal activity. This footage can then be used to prosecute those identified.

HEALTH & SAFETY

The use of CCTV offers a major opportunity for accident investigation. Being able to establish the true cause of an accident will allow the Company to apply an effective corrective action. This proactive approach to safety monitoring will also provide sound reasoning behind new approaches to working practices.

ROOT CAUSE ANALYSIS

Castings plc will deploy and use CCTV to monitor production equipment, in order to identify equipment malfunctions, allowing retrospective analysis and leads to correct root cause being established.

On an ad-hoc basis the Company may install cameras to detect criminal and undesirable behaviour by members of the workforce. This would include, for example:

- Urinating in places other than a WC.
- Offensive graffiti.
- Dangerous acts.
- Damage to Company property.

KEY NOTES

- Recognisable images captured by CCTV systems are "personal data". They are therefore subject to the provisions of the Data Protection Act 1998.
- The system is operated by Castings plc who is the data controller.

- Images are recorded and available on the system on a 20+ day rolling basis depending on system size.
- Individual members of the workforce can make a “subject access” request to a Company Director to view images. An aid of identification, date, time and place will be required. The images must not include third party individuals unless they agree in writing. They will be produced on a CD and must be signed for. There will be a maximum £10.00 charge for this. Images will be available following a subject access request within 40 calendar days.
- There is a log to register the viewing of recorded images by the Data Controller; with the log stating target area, reason images are being viewed, camera number and time period.
- The cameras in operation will be wall mounted static and motorised PTZ type. The PTZ type cameras can be remotely zoomed and moved. They also respond to PIR type sensors and move to predetermined positions.
- Access to view monitors and/or to operate equipment shall be limited to the designated operators of the systems. Only staff with responsibility for using the equipment shall have access to operating controls (including external security staff).
- The use of CCTV will be reviewed on a regular basis; whereby additional cameras may have to be deployed or existing cameras removed if there is no longer a requirement for CCTV monitoring.
- The intension is for 100% CCTV coverage of the external environment. CCTV used internally will be in conjunction with both the Company and Union, with the following limitations:
 - CCTV will not be operated in toilets, private offices or changing rooms, unless this is necessary for the investigation of a serious crime where there is a serious risk to health and safety. CCTV will be used in this way only where it is an appropriate means of achieving the aim in the circumstances.
 - Where CCTV is used in order to retrospectively problem solve, such as corelaying or SG treatment, the findings may be used to train employees.
 - CCTV evidence may be used against an employee in disciplinary proceedings only where such evidence tends to show in the reasonable belief of the employer that the employee is guilty of misconduct. The employee will be given the opportunity to see and respond to the images in these circumstances.
 - CCTV will not be used for monitoring the output rate of an employee.

- In areas of surveillance, signs will be displayed prominently to inform employees that CCTV is in use.
- Directors of the Company will have access to CCTV footage and in addition the engineering department may have monitors for the purpose of viewing particular plant or mechanical function. In order that the system can be set up appropriately to view processes that involve employees, the engineering department may have monitors for this too. In either case this would be limited to access by the maintenance supervisor in a particular bay and will be password protected. No other employee would have routine access and there will be no access whilst offsite for any employee.

26/10/2015

The CCTV system in operation at Castings plc has been installed and maintained under service contract by J3UK to FSA (Fire and Security Association) No-141720 CCTV code of practise. Under the Data Protection Act 1998, J3UK are registered with the Information Commissioner's Office (ICO) registration number A8003117.

The CCTV system data controller is Castings plc, ICO registration number Z5865937 operating under the CCTV code of practise revised edition 2008. Named individual who is responsible for the operation of the system is Jason Staphnill.