

CCTV POLICY STATEMENT



Note this document refers equally to both UK & EU GDPR until such time there is divergence between the two.

Purpose

The Barrett Steel Group together with other companies within the group (the Company) operates as independent steel stockholders, metal processors & ancillary product suppliers. The Company uses closed circuit television (CCTV) images to provide a safe & secure environment for employees & for visitors to the Company's business premises, such as clients, customers, contractors & suppliers, & to protect the Company's property.

Definition

Where GDPR is written this refers equally to UK & EU GDPR legislation unless definitively identified otherwise.

Scope

This policy sets out the use & management of the CCTV equipment & images in compliance with the General Data Protection Regulation 2016/679 (GDPR) & the CCTV Code of Practice. You are required to comply with this policy at all times. This document should be read in conjunction with the Company Data Protection Policy & Manual; the policy does not form part of any employee's contract of employment & the Company may amend this as any time.

The Company's CCTV facility records images only. There is no audio recording i.e. conversations are not recorded on CCTV (but see the section on covert recording).

Purposes of CCTV

The Company has installed CCTV for its legitimate interests which are as follows:

- To ensure that Health & Safety rules & Company procedures are being complied with.
- To increase the safety of employees, contractors, agency workers & visitors.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees & to assist in providing relevant evidence.
- To assist in the delivery of training.
- To support the police in assisting in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification & prosecution of offenders.
- To monitor the security of the Company's business premises.

CCTV will not be used for any other purpose.

Location of Cameras

Cameras are located at strategic points throughout the Company's business premises. The Company has positioned the cameras so that they only cover communal or public areas on the Company's business premises & they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, changing rooms. The company will regularly evaluate whether it is necessary & proportionate to continue using CCTV – this will be performed at least annually unless a need is identified sooner. Canteens & Offices are not routinely monitored unless for specific reasons & only after Data Privacy Impact Assessment (DPIA) has been performed.

All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible. Appropriate warning signs are clearly & prominently displayed so that employees, clients, customers & other visitors are aware they are entering an area covered by CCTV.

In the event of a change of use for the area being covered by CCTV, the Company will consider whether a further DPIA should be carried out.

Recording & Retention of Images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly & that the media is producing images of suitable quality for the intended purpose.

CCTV POLICY STATEMENT



Images are recorded based on movement activation (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted & overwritten on a recycling basis and, in any event, are not held for more than 90 days. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable encrypted storage media are erased or destroyed once the purpose of the recording is no longer relevant. However, where an enforcement agency is investigating a breach of policy or crime, images may need to be retained for a longer period. The Company undertakes systematic checks to ensure that retention periods ARE being complied with. However, images may be kept for longer than 90 days of required for litigation, criminal proceedings, or investigation.

Access to & Disclosure of Images

Access to, & disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images will only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded are held in a secure location. Access to recorded images is restricted to the authorised personnel who shall only view them in accordance with the purposes of the system. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used & will be limited to:

- The police & other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification & prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with Company disciplinary & performance management processes.
- Individuals whose images have been recorded & retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Chief Executive Officer of the Company or another senior director acting in their absence such as the Group H&S Director, the Group IMS Director, the Group HR Director, the Group Asset Care Director or Group Logistics Director must authorise the disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure & access to images will be documented, including the date of the disclosure, to whom the images have been provided & the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individual Access Rights

Under the GDPR, individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a Subject Access Request to GDPR@barrettsteel.com or verbally via your immediate supervisor. The Company will always check the identity of the employee making the request before processing it.

The Group IMS Director will first determine whether disclosure of your images will reveal third party information as you have no rights to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

CCTV POLICY STATEMENT



The Company will respond to Subject Access Requests within one month of receiving the request. However, the Company reserves the right to extend the period of compliance by a further two months where the requests are complex or numerous. In this case you will be informed, in writing, within the first one-month period & explain why such an extension is necessary.

Covert Recording

The Company will only undertake covert recording with the written authorisation of the Chief Executive Officer of the Company, or another senior director acting in their absence such as the Group H&S Director, the Group IMS Director, the Group Asset Care Director or Group Logistics Director where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place & informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection.

Covert monitoring may include both video & audio recording.

Covert monitoring will only take place for a limited & reasonable amount of time consistent with the objective of assisting in the prevention & detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

Staff Training

The Company will ensure that all employees handling CCTV images or recordings are trained in the operation & administration of the CCTV system & on the impact of the General Data Protection Regulation regarding that system.

Implementation

The Group IMS Director & Group Asset Care Director are jointly responsible for the implementation of and compliance with this policy & the operation of the CCTV system & they will conduct a regular review of the Company's use of CCTV. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to CCTV@barrettsteel.com.

Andrew Warcup

Andrew Warcup
Chief Executive Officer
December 2023

| | | | |
|--------|----------------|------------------|----------|
| Issued | Dec-2021 | Last Review Date | Dec-2023 |
| Author | Sharon L Smith | Next Review Date | Dec-2024 |