CCTV Policy

Scope of the Business

This policy covers the scope of all Group Solutions Limited Companies (Kings) including:

- Kings Security Systems Ltd T/A Kings Secure Technologies
- Kings Guarding Solutions Ltd
- East Fire Extinguishers & Alarms UK Ltd T/A E-fire
- Silver UK Ltd T/A Silver Group
- Cougar Monitoring Ltd
- Quidvis Ltd

Introduction

Kings use various monitoring platforms to monitor CCTV in both Public and Private spaces.

This document, in conjunction with Kings' Work Instructions and Procedures are designed to give clear guidance on the company's use of CCTV systems and to protect Kings and its staff from allegations of misuse and the public from any abuse of the CCTV systems. Failure to comply with these documents could lead to disciplinary action.
This policy covers the use of CCTV monitoring software and the gathering, storage use and disposal of data. The policy applies to all staff employed by Kings.
This policy applies to the monitoring of Customer's data and the internal monitoring of the company's own premises and property.

Objectives of CCTV system

It is important that everyone including dedicated CCTV operators working for or on behalf of Kings understand why each of the systems has been introduced and what the cameras will and will not be used for.

Each customer will have its own assignment instructions; these will include some of the following:

- Protecting areas and premises used by customers and the public.
- Deterring and detecting crime and anti social behaviour.
- Reducing violent and aggressive behaviour towards customers.
- Promoting a safe and secure environment for customers and their staff.
- Assisting law enforcement agencies with incidents providing evidence leading to arrests and successful prosecution.

The monitoring software in use will not be used for any other purpose than those set out in this document.
The monitoring software will only be used to detect and prevent criminal activity, or for evidential purposes for internal investigations where suspected breach of Kings policies and procedures has arisen.
Individuals on Customers' premises will only be monitored if there is reasonable cause to suspect that a criminal offence has been or may be about to be committed.
The monitoring software may be used to monitor private spaces to provide safe and secure environments – this may also involve the use of a public address system. This activity is at the direct request of the customer and outlined in the assignment instructions or contract.

Legislation

In addition to Kings policies, procedures and codes of practice, CCTV and its operation are subject to legislation under:

The Data Protection Act 2018
The Humans Rights Act 1998
The Freedom of information Act 2000
The regulation of investigatory powers Act 2000
The Protection of Freedoms Act 2012
The General Data Protection Regulations "GDPR" (2016)

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Company Registration No: 07706703

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It is important that all CCTV monitoring operations comply with these acts; this is to ensure all stakeholders are protected from abuse of the system. The Technology Centre Manager, along with the Compliance Team will review all information annually to ensure information is kept up to date.

Responsibilities

The day-to-day responsibility for this policy sits with the Head of Operations and the Operators who operate the monitoring software and handle the data.
The Head of Operations is responsible for the monitoring operation and ensuring that all operators are kept up to date on legislation and changes in procedures.
Responsibility for downloading footage is shared between the Technical Support Department and the Technology Centre. Respective Managers are responsible for making sure that the operational team are authorised to view, record and where needed save images using the monitoring software, they are properly trained and comply with the Work Instructions. Persons without authorisation are not permitted to operate the monitoring software or view the images.

Operators using monitoring software:

- All Operators using monitoring software within Kings are responsible for operating the equipment in accordance with requirements set out in current legislation, assignment instructions, Work Instructions and contractual requirements.
- All Operators must ensure that their training is up to date and relevant to their job role.
- All Operators are responsible for bringing any faults or misuse of the equipment to the Head of Operations attention immediately.

Deployment of CCTV Cameras

Kings is committed to respecting peoples' rights to privacy and fully supports the individual/s entitlement to go about their lawful business, this is a consideration in the deployment of any CCTV monitoring system, ultimately there will be a loss of privacy when CCTV cameras are deployed.
Where CCTV is deployed in a public space, serious consideration is given to the location and placement of equipment and the impact on the privacy of the individuals in the area.
CCTV is not to be installed in such a way that it can look into private spaces such as neighbouring houses, or areas outside the Customer's/Kings' remit, unless privacy zones can be fitted to block out any private areas.

Monitoring

The monitoring of any and all monitoring software will only be carried out by authorised SIA licensed operators.
Dependant on contractual agreements CCTV images may be recorded and stored for evidence and crime prevention purposes. Images will only be taken when a crime has been suspected or verified as committed and can be verified by monitoring software. The images may be passed to law enforcement if requested or deemed appropriate.
Any images recorded and stored will be done so in line with relevant legislation, data protection and codes of practice.
Access to stored images is restricted to those who require access to fulfil contractual duties only.
The release of images or footage can only be authorised by the Head of Operations or Customer Account Manager, or a member of the Senior Leadership Team in their absence. If footage is requested by an enforcement agency, two copies are to be made with the original copy securely stored within the Kings network and the copy sent to the relevant enforcement agency, this will be completed in line with the codes of practice.
Any footage or images stored within the database will be done so for a period not exceeding 6 months (unless requested otherwise by the Customer based on their own risk assessments), the Technology Centre and IT management will be responsible for the storage and upkeep of any data.
A full record will be kept of all distributed footage or images, the record is stored on the central database.

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Customers may request to have footage or images downloaded of their respected sites. Any data distributed will be in accordance with the codes of practice and relevant *Data Share* agreement.

Third party access.

Under the Freedom of Information Act and the Data Protection Act, members of the public have the right to ask to see the data held by the CCTV scheme owner.
If such a request is made, the persons requesting the data will be passed on to the relevant customer to request the data directly.

Recording systems

All software monitored by Kings is digital, the data monitored by Kings is not owned by Kings and remains the property of the authorising customer.
Any data recorded or stored by Kings will be done so in line with the codes of practice and all relevant legislation. No data will be stored longer than necessary and will be removed in line with codes of practice.
Recorded material will not be sold or used for entertainment purposes. Images provided to enforcement agencies will at no time be used for anything other than the purposes they were originally released for.
Recording equipment will be stored securely and access will only be granted to authorised staff within Kings. Kings are not responsible for monitoring equipment owned by a customer or third party.

Misuse of CCTV on Personal Devices

Under no circumstances may CCTV footage be recorded, downloaded, shared, or transferred to any personal devices, including but not limited to personal smartphones, tablets, laptops, or external storage media. The handling of CCTV footage is restricted to authorised personnel using designated, secure company devices and systems.

Any breaches of this policy, including the recording, storing, or sharing of CCTV footage on personal devices, will be fully investigated by the company. This includes, but is not limited to, unauthorised access, distribution, or tampering with CCTV data.

Disciplinary offences and security

Tampering with or misuse of monitoring equipment, images or customer data by staff will be regarded as misconduct and could lead to disciplinary action which may result in dismissal or prosecution.
Any breach of this policy document and or the Codes of Practice will be regarded as misconduct and could lead to disciplinary action which may result in dismissal.

Complaints

Complaints can be made following our complaints policy, a copy of which is available upon request (CPL43).

All complaints will be dealt with in line with CP09 Complaints Procedure.

Bob Forsyth
Chief Executive Officer

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