



Ideal Cleaning Services Limited

CCTV Policy Statement

Introduction

Ideal Cleaning has a CCTV system in place at its Nottingham Head Office and Branch Offices. This policy describes the purpose, use and management of the CCTV system and details the procedures in place to ensure that Ideal Cleaning complies with relevant legislation and codes of practice.

Ideal Cleaning will have due regard to the Data Protection Act 2018, the General Data Protection Act (GDPR) and any subsequent data protection legislation, the Freedom of Information Act 2000 and the Human Rights Act 1998.

Ideal Cleaning is registered as Data Controller with the Information Commissioner's Office – registration number Z1020077.

Purpose

Ideal Cleaning has installed a CCTV system for the safety and welfare of its staff, the prevention, reduction, detection and investigation of crime and other incidents. Cameras are sited to ensure that they cover the exterior of the premises as far as possible and do not focus on private residential areas. Any changes to the CCTV system shall be subject to a Privacy Impact Assessment.

Responsibilities

The Group MD has overall responsibility for this policy, has delegated the day-to-day responsibility for its implementation to the Director.

The Director is responsible for ensuring that adequate signage is in place to inform staff, visitors and members of the public that CCTV is in operation. The signage indicates who is managing the CCTV system, the purpose and contact details for any queries or requests for footage.

Compliance

Due regard will be given to the data protection principles contained within the GDPR which provide that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner.
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d) accurate and, where necessary, kept up to date.
- e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Internal Cameras

Where CCTV cameras are installed internally in individual offices and other communal locations, Ideal Cleaning recognises that some employees may not be fully comfortable with this and will allow these cameras to be turned off during periods where the premises is occupied. Where CCTV cameras have been turned off during periods of occupancy these must be turned back on when the office closes and at all times the office is unoccupied.



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Access to CCTV Footage and Retention Period

All images recorded by the CCTV system remain the property and copyright of Ideal Cleaning.

Images may only be accessed by the Group MD, Directors, IT Personnel and Regional Managers where appropriate, will be allowed access to their Branch Office only.

Applications for Disclosure of Footage

Applications by individual data subjects – requests shall be submitted in writing to the Group MD, 351 Nuthall Road Nottingham NG8 5BX, together with proof of identity. Sufficient detail must be provided to allow Ideal Cleaning to locate the relevant images and for the data subject to be identified. Where Ideal Cleaning is unable to supply footage without disclosing the personal data of another individual, it will not comply with the request unless satisfied that the other individual has provided their express consent to the disclosure (unless it is reasonable, having regard to the circumstances, to comply without the consent of the individual).

Applications by third parties – requests shall be submitted in writing to the Group MD, 351 Nuthall Road Nottingham NG8 5BX. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime, or in other circumstances where an exemption applies under relevant legislation.

The Director shall retain records of any disclosures of CCTV footage.

Retention of images

Unless required as evidence, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

Complaints Procedure

Complaints concerning Ideal Cleaning's use of its CCTV system shall be made to the Group MD.

Policy Review

This policy shall be reviewed a minimum of annually by the Senior Management Team.

For and on behalf of Ideal Cleaning Services Limited

CHRISTOPHER DRING
Group Managing Director

Reviewed 09-2023

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