

# **CASTINGS (GROUP) CCTV POLICY**

## Document Control

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|  | Castings PLC (Group)         |
|  | CASTINGS (GROUP) CCTV POLICY |
|  | 1.1                          |

## Document Revision History

| 27/09/2023 | 0.1 | B Drew | Draft  |
|------------|-----|--------|--|
| 02/02/2024 | 0.2 | B Drew | Updating policy content                        |
| 20/05/2024 | 0.3 | B Drew | Updating policy content as per make UK         |
| 20/05/2024 | 1   | B Drew | Approved                                       |
| 07/03/2025 | 1.1 | B Drew | Updating Content to Include Out-Of-Hours usage |

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## 1. 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 Group (Castings PLC, CNC Speedwell Limited, William Lee Limited & Castings Ductile Limited).

This policy applies to all employees, officers, consultants, self-employed contractors, agency workers, volunteers and interns. It also applies to anyone visiting our premises.

This policy takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation (“GDPR”)
- Data Protection Act 2018
- ICO’s guidance on CCTV and video surveillance
- Human Rights Act 1998

## 2. CAMERA LOCATIONS

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate by carrying out a data protection impact assessment (DPIA).

There are cameras both inside and outside premises. All cameras are in a fixed position & are not electrically movable.

All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated and be as visible as possible.

Some parts of the public highway are in view as foundry traffic (including forklift trucks) cross the main road.

No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

## 3. SECURITY

Historically, the Group has suffered significant losses due to the theft of raw materials and patterns as well as material damage to barriers, gates and buildings. Site camera’s view vehicle entrances onto the various parts of the site, high volume vehicle usage areas, machinery areas & door entrances. The use of external cameras will offer both a deterrent and an opportunity to record criminal activity. This footage can then be used to prosecute those identified.

## **4. 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.

## **5. USE OF CCTV**

The majority of CCTV is continually recorded with the viewing screens switched off so this cannot be viewed in real time.

If an issue occurs or is reported, then only an authorised person (senior manager or director) can complete the CCTV log giving details of the reason for viewing before viewing the footage.

The exception to the above are specific cameras that are focussed on the foundry equipment and the casting areas. Screens for real time viewing are in supervision areas so that operational issues can be picked up without delay.

For most cameras, footage will be stored for up to 3 months. Some footage on critical areas is kept for up to 12 months primarily to identify quality problems raised at a later point.

The company undertake consultation with our recognised Trade Union regarding CCTV and wish to be as open and clear as possible about all aspects concerning CCTV.

We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the Chief Executive

The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision.

Only limited numbers of people will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or

Our organization utilizes CCTV cameras to enhance the security of our premises and ensure the safety of our personnel and assets. These cameras are in operation both during regular hours and outside of normal business hours.

## Out-of-Hours Monitoring:

- Designated personnel are authorized to use the CCTV cameras for live viewing purposes during out-of-hours periods.
- The primary purpose of out-of-hours monitoring is to safeguard site security and promptly respond to any potential security incidents.

We are committed to ensuring that all CCTV usage complies with relevant data protection laws and respects the privacy of individuals. Our designated personnel are trained to handle live viewing in accordance with our security protocols.

## 6. REQUESTS FOR CCTV

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images either via the method below or a subject access request (SAR)

Requests for viewing of CCTV should be sent to the relevant director responsible.

- Castings PLC - [James.Greaves@castings.plc.uk](mailto:James.Greaves@castings.plc.uk)
- William Lee Limited - [Simon.Alexander@wmlee.co.uk](mailto:Simon.Alexander@wmlee.co.uk)
- CNC Speedwell Limited - [Steve.Barwell@cncspeedwell.co.uk](mailto:Steve.Barwell@cncspeedwell.co.uk)
- Castings Ductile Limited – [John.Ford@ductilecastings.co.uk](mailto:John.Ford@ductilecastings.co.uk)

The director will consider the circumstances. If the footage contains only the individual, then they may view the footage.

Requests to view CCTV that also show other personnel will need to be carefully considered by (the) Director as to whether other individuals can be identified and whether it is reasonable to seek their permission for this and the wider circumstances of the request.

Permanent copies of CCTV will only be made if there is a legal requirement to do so and it has been deemed essential to provide this. We do not currently have the technology to blur out faces on our CCTV.

Any CCTV footage used as part of a disciplinary process will be made available for viewing to the individual/s and their representatives.

Requests from law enforcement agencies for CCTV will be complied with subject to the above considerations.

Any complaints or issues with CCTV should be made to (the) director and will be duly investigated.

Any requests for CCTV footage for damage / vandalism to personal property / vehicles should be sent to the relevant director, who will then consider the circumstances. If the footage contains only the individual, then they may view / release the footage. This will be provided via a URL Link & accessible to download for 7 days only.

We recognise that, in rare circumstances, individuals may have a legal right to request erasure of personal data concerning them or to restrict the processing of their personal data. Any member of staff who considers that these rights apply to them in relation to our use of CCTV should speak to their line manager OR the HR Department in the first instance

## 7. POLICY OVERVIEW

### **1) Who will be captured on CCTV?**

All employees and any visitors to the site.

### **2) What personal data will be processed?**

Facial Images, behaviour and actions, sound.

### **3) What are the purposes for operating the CCTV system?**

Health & Safety, accident investigation, quality, security and identifying and preventing criminal activity. assisting in day-to-day management; resolution of disputes which arise in the course of disciplinary and grievance proceedings; and for use in civil litigation, including employment tribunal proceedings

### **4) What is the lawful basis for operating the CCTV system?**

We currently use CCTV [around our site] as outlined below. We believe that such use is necessary for legitimate business purposes, including: Legitimate interests of the organisation to maintain health and safety and to prevent and investigate criminal activity

### **5) Who is/are the named person(s) responsible for the operation of the system?**

Simon Alexander (WM Lee), James Greaves (Castings PLC), Steve Barwell (CNC Speedwell), John Ford (Castings Ductile)

### **6) Describe the CCTV system**

CCTV is in operation across the site and all cameras are positioned to be as visible as possible. Signage is up across the site to make clear CCTV footage is in operation. Real time viewing is only undertaken in the areas specified in the policy. All other cameras do not have viewing screens displayed in real time and need to be viewed as historic footage for purpose specified in the CCTV log.

### **7) Set out the retention period of any recordings**

Up to 3 months and up to 12 months in areas where quality issues may need to be traced back to a specific operational activity.

### **8) Set out the security measures in place to ensure that recordings are captured and stored securely.**

CCTV cannot be accessed from outside company premises. We password protect our viewing stations and CCTV is on a standalone network. All CCTV recordings are kept onsite for the period specified in the policy.