



Whiteriver (WRG) Limited & Seadec Limited t/a Whiteriver Group

CCTV Policy

Sept 2024

Disclaimer

The information contained in this employee handbook is not an employment contract, but rather is a summarised version of existing company policy. Whiteriver (WRG) Limited reserves the right to modify this employee handbook from time to time according to their sole discretion without notice. If a more detailed explanation of any policy in this handbook is needed, employees should consult with their Manager.

CCTV POLICY**INTRODUCTION**

Whiteriver Group (WRG) Limited, as a data controller, processes the personal data of individuals through its use of Closed-Circuit Television (CCTV) in its premises.

PURPOSE OF POLICY

The purpose of this policy is to document the use of CCTV in the monitoring of Warehouses, Public Areas and external areas of Whiteriver (WRG) Limited premises. The aim is to ensure that CCTV is used transparently and proportionately in accordance with data protection legislation.

SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

It applies to staff, children and visitors to Whiteriver Group premises.

PURPOSES OF CCTV

CCTV surveillance is employed for the following purposes:

- To assist in delivery/collection verification for customers and suppliers
- To assist in providing for the safety and security of staff, visitors and premises.
- To assist in providing for the safety of staff and visitors, to assist in the resolution of incidents involving workplace injuries or near misses and to assist in the formulation of a corrective action.
- To assist WRG where its grievance, disciplinary or dignity at work procedures have been invoked.
- To enable WRG to respond to legitimate requests from third parties for CCTV footage of incidents e.g. Gardai

The Company has the ability to view CCTV remotely and reserves the right to do so where necessary.

Where, in the carrying out of these purposes, images are obtained of persons committing acts of an illegal nature and / or acts which breach Whiteriver (WRG) Limited's policy, these may be used as evidence.

Internal cameras are fitted in most operational areas and publicly accessed areas on the premises. External cameras are/will be fitted for building security and for monitoring safe and secure ingress/egress of the premises and buildings.

SIGNAGE

Signage is displayed at prominent locations throughout each premises, so staff and visitors are aware that CCTV cameras are in use:

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Management, Storage & Retention of CCTV

It is not the policy of Whiteriver (WRG) Limited to retain CCTV recording. As a general rule CCTV recordings are overwritten automatically over time. This period of time varies from premises to premises based on the number of cameras and the system capabilities; it is usually 3 – 6 months but can be longer depending on memory capacity.

When used in conjunction with an investigation or as evidence, recordings may be retained specifically in that context until the issue is resolved. After this period, images are safely deleted. Recordings will only be retained if an incident occurs which may require further investigation or review

The backing up of recordings will only be done for specific reasons or incident. The back up will be carried out by a member of management and will only record what is needed to review or examine a particular event.

Procedure for Handling Access Requests

Disclosure of images from the CCTV system is controlled and consistent with the purposes for which the system exists. All requests to access CCTV footage are channelled through the relevant service manager.

Subject Access Requests

Individuals have the right to access their personal data including their image in CCTV recordings.

Requests shall be made in writing to their Line Manager who will pass on the request to Senior Management. Requests must include the date, time and location where the CCTV image was recorded. Whiteriver (WRG) Limited aims to respond promptly and at the latest within one month of receiving a valid request.

Access Requests by An Garda Síochána

Requests for access to view or take a back up of recorded images by An Garda Síochána must be made in writing on official Garda headed paper. Where time is a critical factor in an investigation Senior management may accept a verbal request for a viewing. This verbal request must be followed up by the written request.

Compliance with this Policy

All employees who are responsible for implementing, managing, operating or using the CCTV system must do so only as authorised and in accordance with this Policy. Any failure to comply with this Policy may be a disciplinary offence.

Review

This policy will be subject to review every 12 months or as and when company, legislative updates or system changes require.

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