

1. Purpose and Scope

1.1 The purpose of this CCTV/ ANPR policy is to:

- Inform Crossland Tankers Ltd (CTL) employees and other interested parties who visit CTL premises of the arrangements in place for the placement, purpose/ operation and management of CCTV/ ANPR systems.

2. Placement of CCTV Systems, Cameras and Central Recording Hubs

2.1 CTL operates CCTV systems across both manufacturing premises (Burnley, Lancashire and Swatragh, Northern Ireland).

2.2 CTL operate an Automatic Number Plate Recognition (ANPR) system at its Swatragh, Northern Ireland manufacturing premise.

2.3 CCTV cameras are strategically placed to maximise coverage while respecting the privacy of CTL employees and other interested parties who visit CTL premises.

2.4 CCTV cameras are not placed in private areas on CTL premises.

2.5 CCTV central recording hubs are located in restricted areas with restricted access to authorised personnel only.

2.6 Authorised personnel are those who have specific purpose for access in accordance with Company requirements and by approval of CCTV Management personnel.

3. Purpose / Operation of CCTV/ ANPR systems

3.1 CTL operate CCTV/ ANPR systems specifically for the purpose of:

- Protecting the Company's property.
- Preventing and detecting crime or equivalent malpractice.
- Identification, apprehension and prosecution of offenders.
- Identification of actions that might result in disciplinary action.
- Providing a safe and secure environment for employees and other interested parties who visit our Company premises.

4. Management of CCTV/ ANPR

4.1 CTL Data Protection Officer (DPO) has overall responsibility for the operation and management of CTL CCTV/ ANPR systems including but not limited to the installation, maintenance, recording, reviewing, monitoring, and auditing of the systems and ensuring legal compliance.

5. Legal Compliance

5.1 CTL complies with relevant data protection legislation, including but not limited to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

5.2 CTL complies with all other relevant legal, statutory, regulatory or other requirements pertaining to CCTV/ ANPR systems operations and management.

6. Data Protection and Privacy/ Transparency

6.1 CTL will operate and manage CCTV/ ANPR systems in a manner which respects the privacy rights of CTL employees and other interested parties who visit CTL premises.

6.2 Relevant signage is displayed around CTL premises informing CTL employees and other interested parties who visit CTL premises that CCTV/ ANPR systems are in operation and the purpose of their operation.

6.3 Access to live and recorded CCTV/ ANPR footage is restricted to authorised personnel only.

6.4 Authorised personnel are those who have specific purpose for access in accordance with Company requirements and by approval of CCTV/ ANPR Management personnel.

6.5 Should CCTV/ ANPR footage be requested by CTL employees or other interested parties who visit CTL premises, this must be done so in conjunction with the Police Service of Northern Ireland (PSNI) or Lancashire Constabulary.

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Windchill Admin	1.3	Released

7. Security of CCTV/ ANPR Systems

7.1 Security measures, including password protection and encryption is implemented to prevent unauthorised access to CCTV/ ANPR Systems.

8. Data Retention

8.1 Retention periods for CCTV/ ANPR footage is based on its specific purpose in accordance with Company requirements and by approval of CCTV/ ANPR Management personnel.

8.2 CTL DPO will ensure that CCTV/ ANPR footage is deleted in accordance with the CTL Data Retention Policy Statement (IP13.13).

8.3 Unnecessary or outdated CCTV/ ANPR footage will be promptly deleted to comply with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 or other relevant legal, statutory, regulatory or other requirements.

8.4 If CCTV/ ANPR footage is of an incident which has occurred at CTL premises, CTL reserve the right to retain this footage indefinitely.

9. Monitoring Procedures

9.1 Monitoring of CCTV/ ANPR systems is conducted by authorised personnel only, only as required, if there is specific purpose for access in accordance with Company requirements and by approval of CCTV Management personnel.

9.2 Authorised personnel are those who have specific purpose for access in accordance with Company requirements and by approval of CCTV/ ANPR Management personnel.

10. Accountability and Training

10.1 Management personnel and authorised personnel authorised to operate the CCTV/ ANPR system receive training appropriate training on data protection laws, privacy considerations, and proper operation of the system.

10.2 Any breaches in operation of the CCTV/ ANPR system will be subject to disciplinary in accordance with the CTL disciplinary policy and procedure.

11. Review and Audit

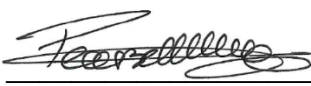
11.1 Regular reviews and audits of the CCTV/ ANPR system are conducted to ensure compliance with this policy and all relevant legal, statutory, regulatory or other requirements.

11.2 If a breach of legal, statutory, regulatory or other requirements is detected, necessary adjustments to the CCTV/ ANPR system will be implemented and/ or this policy revised as required.

12. Policy Review

12.1 CTL will ensure compliance with this policy statement at all time and review periodically or subject to changes in relevant legal, statutory, regulatory or other requirements. CTL will communicate this policy statement to all CTL employees and make it available to all other interested parties upon requested.

This policy has been approved and authorised by:

Signed: 
Pearse McKeefry
(Managing Director)

Date: 28/04/2025
Review Date: April 2026

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