

Monitoring Policy



Monitoring is a necessary part of ensuring the smooth operation and security of Wood's business and ensuring Wood's intellectual property, facilities, telecommunications and IT systems are used appropriately. However, since monitoring has the capacity to intrude or interfere in the private lives of individuals, it must be proportionate and justified. Therefore, any benefits to Wood of monitoring staff, suppliers or third parties, must be balanced and weighed up against any possible adverse impact on individuals.

Purpose:

The purpose of this Policy is to set out the key principles which must be applied in relation to monitoring of individuals.

This Policy is intended to promote best practice across Wood and is an internal document. It does not give third parties the right to audit compliance or to sue on the basis of its contents.

Scope:

This Policy applies to all Wood Personnel and Wood Companies.

Policy Requirements:

Responsibility for Policy

The Data Protection Officer is responsible for the development, review and maintenance of this Policy. Business areas and group functions are responsible for ensuring they have arrangements in place to address the requirements of this Policy.

Definitions

'Wood Companies' and "Wood" means John Wood Group PLC, its subsidiaries and joint ventures and consortia under their day to day management and control.

'Wood Personnel' means all employees, consultants working within Wood, workers and statutory directors or other officers of Wood Companies.

Principles

Monitoring means any activity to collect information about individuals by keeping them under some form of observation. It goes beyond one individual simply watching another and involves the manual recording or any automated processing of personal information. Monitoring may be systemic or occasional.

The following principles apply to monitoring:

- Monitoring must be lawful, justified and compliant with Wood's policies and procedures.
- There must be benefits to Wood from the monitoring.
- There must be no reasonable, less intrusive alternative.
- Individuals must be informed of monitoring ("transparency"). Notification may be given in the worker privacy notice, policies, procedures and other Wood governance documents such as the IT Acceptable Use Policy, by physical signs or other methods.
- Monitoring must not be discriminatory.
- Monitoring should be timebounded and only carried out for the time necessary to achieve its purpose.
- All monitoring information and results must be kept secure and access to them must only be provided to those who need to know.
- Any technology which is used must not contain any inherent unfairness and must involve an element of human oversight.
- Monitoring must be appropriately authorised and have appropriate controls.

Types of Monitoring which are likely to be appropriate

Subject to compliance with the Monitoring Standard and other applicable Wood policies and procedures, monitoring will usually be appropriate for the following purposes:

- Ensuring the smooth operation of, and safeguarding the security, integrity and availability of Wood's data communications network, computer systems and other IT infrastructure, fault investigations, security incident handling, capacity planning for network expansion and service upgrades and detecting and investigating unauthorised use. More details of IT monitoring are set out in the [IT Acceptable Use Policy \(GIT-POL-110007\)](#)

- Law enforcement and compliance checks against Wood policies and regulatory requirements
- Compliance with health and safety rules or to assist in the prevention of crime e.g. use of CCTV cameras in accordance with the CCTV Monitoring Standard
- Monitoring to collect commercial information, recordings of telephone calls or other communications for training purposes or for dealing with complaints

Employee Obligations

Only authorised staff and third parties are permitted to carry out monitoring and must do it appropriately. In particular, they must:

- Respect the privacy of others, at all times
- Ensure appropriate governance and controls including impact assessments are applied to monitoring activity
- Not use or disclose information realised in the monitoring process for purposes other than those for which the process was approved
- Safeguard information collected in the monitoring process against any potential unauthorised access
- Destroy information collected in the monitoring process in accordance with any relevant retention period.

Any breach of this Monitoring Policy may result in reference to the Just and Fair Procedure which may result in disciplinary action up to and including termination of employment or other legal action as appropriate.

Privacy Impact Assessments

In all but the most minor cases, an impact assessment must be carried out to decide if and how to use monitoring. Assessments should be carried out in accordance with the Monitoring Standard and the [Privacy Impact Assessment Procedure \(COP-PRO-110069\)](#).

Retention of information

Personal data collected during the monitoring process should only be retained for as long as is necessary to fulfil the purposes of monitoring and as evidence in the defence and pursuit of legal claims. Personal data collected for monitoring purposes should be kept securely and destroyed once it is no longer needed, in accordance with Wood's Personal [Data Retention Period Standard \(COP-STD-110001\)](#).

Please contact privacy@woodplc.com if you have any questions.

Name	Ken Merry
Position	Chief Ethics and Compliance Officer
Date	16 March 2022