



# 19. Monitoring Policy

**Reviewed By:** Melissa Munnich

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Employee monitoring covers monitoring of employees' use of the Company's information technology systems and the recording of images of employees by video and vehicle location monitoring. Monitoring may include the following:

- Monitoring lateness by video cameras;
- Checking e-mails to ensure the system is not abused;
- Checking websites visited by employees using Company systems; and;
- Recording telephone calls.

If automated or AI-driven systems are used in monitoring, the Company will inform employees of their usage, purpose, and any safeguards in place to prevent bias or undue impact on privacy. Monitoring will always be proportionate and conducted transparently.

Monitoring data will be retained only as long as necessary for legitimate business or legal purposes and will comply with data minimisation principles under GDPR and other applicable data protection laws. Data collected will be securely deleted once its purpose has been fulfilled or the retention period lapses

## 19.1 Monitoring with Employee's Knowledge

The Company reserves the right to monitor and access all aspects of its information technology on a regular and on-going basis. Employees have been advised, through this policy, that monitoring will take place on a regular basis.

The Company also reserves the right to introduce monitoring from time to time in other areas of the workplace which are not covered by the Information Security Policy. In compliance with data protection laws, the Company will ensure that any monitoring practices are balanced against employee privacy rights. Employees will be informed of the purpose and extent of monitoring, and new monitoring methods will be introduced only after appropriate consultation and impact assessment. In these instances, before doing so, the Company will:

- Identify the purpose for which the monitoring is to be introduced;
- Ensure that the type and extent of monitoring is limited to what is necessary to achieve that purpose;
- Consult with affected employees in advance of introducing the monitoring; and
- Weigh up the benefits the monitoring is expected to achieve against the impact it may have on employees.

The Company will ensure employees are aware of when, why and how monitoring is to take place and the standards they are expected to achieve.

If disciplinary action results from information gathered through monitoring, the employee will be given the opportunity to see or hear the information in advance of the disciplinary hearing and make representations about it.

The Company will ensure data collected through monitoring is kept secure, and access is limited to authorised individuals.

The Company will not monitor employees without their knowledge, unless the Company has reason to believe that employees are engaged in criminal activity. In such instances, any monitoring will take place under the guidance of the Police and will be carried out in accordance with the Data Protection Act 2018 and GDPR.

## **19.2 Telephones**

If the Company monitors telephones it will make employees aware of this. The Company will make available upon request a telephone in a private area, not subject to monitoring, for employees to make urgent personal calls.