

Monitoring & Recording Policy

20/04/2026

Purpose

Tudor Griffiths Group operates telephony, video surveillance and related systems that may record images or voice of employees, customers and visitors. This policy sets out how those recordings are made, used and safeguarded so that they support legitimate business, safety and legal purposes while respecting individual privacy rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Scope

This policy applies to:

- call recording on company telephony systems (inbound and outbound)
- CCTV image recording at Tudor Griffiths Group premises
- any covert recording authorised in the specific and limited circumstances set out below

All employees, contractors, agency workers and visitors on Tudor Griffiths Group premises, or communicating with Tudor Griffiths Group using recorded channels, are within scope.

Lawful Basis & Data Protection

Recordings constitute personal data under UK GDPR. The lawful bases we rely on are:

- legitimate interests — for safety, quality monitoring, training, fraud prevention and security
- legal obligation — where required by law or regulator
- contract — where recording is necessary to deliver a service

Recordings are processed in line with the Tudor Griffiths Group Privacy Policy, and data subjects have the rights set out in that policy, including the right to request access to their personal data.

Call Recording

Inbound and outbound calls on Tudor Griffiths Group telephony may be recorded for quality, training, compliance, dispute resolution and security purposes.

Call recordings are retained for six months from the date of the call and then securely deleted, unless retained longer for a specific investigation, legal proceeding or regulatory requirement.

Under normal circumstances a recording will only be retrieved where it is necessary to:

- investigate a complaint
- confirm the details of a transaction or instruction
- check compliance with regulatory procedures
- investigate a suspected breach of company policy

- support staff training, where the recording is edited so the caller is anonymous and the staff member agrees

Access to call recordings is limited to authorised managers and the IT department. All access is logged.

CCTV

CCTV systems are installed at Tudor Griffiths Group premises to:

- assist in the prevention and detection of crime or equivalent malpractice
- support the identification and prosecution of offenders
- protect the security of people and property
- support compliance with health and safety rules and company procedures
- help identify unauthorised actions or unsafe working practices and provide relevant evidence where needed

Tudor Griffiths Group's CCTV facility records images only. There is no audio recording on the standard CCTV system; audio is only captured in the specific circumstances set out under Covert Recording below.

Cameras cover communal, operational and external areas only. No camera is positioned to record toilets, shower facilities, changing rooms, staff break rooms or private offices. All cameras (other than those authorised for covert recording) are clearly visible, and signage is prominently displayed to inform employees, customers and visitors that CCTV is in operation.

CCTV images are recorded digitally and retained on a rolling basis for up to one month, after which they are overwritten or securely deleted. Images may be retained for longer only where needed for a live investigation, legal proceeding or regulator request. When storage hardware reaches the end of its life it is securely erased before disposal.

Maintenance checks of CCTV equipment are undertaken regularly to ensure it is working correctly and producing images of appropriate quality.

Covert Recording

Covert video or audio recording will only be undertaken with the written authorisation of the Managing Director (or another senior director acting in their absence), and only where there is good cause to suspect criminal activity or equivalent serious malpractice is taking place or about to take place, and informing those concerned would seriously prejudice its prevention or detection.

Covert monitoring will be limited in duration and scope to what is reasonable to achieve the specific objective, and will cease as soon as the investigation concludes.

Information obtained through covert monitoring will only be used for the prevention or detection of the suspected activity. Any unrelated information will be deleted, unless it reveals matters the Group cannot reasonably be expected to ignore.

Access & Disclosure

Access to call and CCTV recordings is restricted to authorised operators, authorised line managers, the IT department and the Data Controller.

Viewing takes place in a secure area; removal of media for viewing is logged.

Disclosure to third parties will only be made in line with the purposes set out in this policy and is limited to:

- the police and other law enforcement agencies, where recordings could assist in the prevention or detection of a crime or the identification and prosecution of an offender
- prosecution agencies, such as the Crown Prosecution Service
- relevant legal representatives
- line managers involved with company disciplinary processes
- individuals whose image or voice has been recorded, unless disclosure would prejudice a criminal investigation

Only the General Manager (or another senior director acting in their absence) may authorise disclosure to external third parties. All requests for access or disclosure, and the reasons for them, are documented. If a request is denied, the reason is recorded.

Staff Training

All employees handling recordings or operating recording equipment receive appropriate training on this policy, current data protection legislation and secure handling of the material.

Subject Access & Rights

Individuals have the right to request access to recordings that identify them and to exercise the rights set out in the Tudor Griffiths Group Privacy Policy.

Requests should be directed to the Data Controller using the contact details in the Privacy Policy. Requests are normally responded to within one month of receipt.

Policy Control

This policy is owned by the Group ICT Manager and approved by the Group Finance Manager and Company Secretary. It will be reviewed annually or sooner where business needs, legislation or the threat landscape change materially.