



GUILDFORD  
B O R O U G H

# **Guildford Borough Council**

## **Monitoring (use of electronic systems) Policy and Procedure**

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# Monitoring (Use of electronic systems) Policy

## Introduction

Guildford Borough Council is committed to ensuring our electronic communications systems and equipment are intended to promote effective communication and working practices within our organisation. This policy outlines the circumstances in which we will monitor use of these systems and the action we will take in respect of breaches of these standards.

Guildford Borough Council uses electronic monitoring/tracking devices to assist with:

- The Health and Safety of our staff and the prevention of injury or harm
- The identification of support and development for training purposes
- The prevention or detection of other forms of misconduct
- The prevention or the detection of crime

The usage of monitoring systems is performed in line with the Data Protection Act 2018 and the accompanying 2018 guidance from the Information Commissioner's Office (ICO) which can be found here [The employment practices code \(ico.org.uk\)](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/employment)

## Scope

The Monitoring (use of electronic systems) Policy will apply to all Council employees, including probationers and employees on fixed-term contracts.

The policy applies to the use of the following staff monitoring and mechanism systems:

- Staff Pass use data
- CCTV Cameras
- Personal Safety Devices
- Mobile and landline work phones
- ICT Kit (e.g. Laptops, network drives)
- Vehicle Cameras
- Ignition off monitoring
- Vehicle trackers

## Aims and objectives

The objectives of this policy are to:

- ensure that the monitoring and usage of our monitoring and electronic systems is done in a fair and proportionate way
- usage and monitoring are done in line with the Data Protection Act 2018 and the Information Commissioner's Office Guidance [The employment practices code \(ico.org.uk\)](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/employment)
- ensure Managers and staff are aware what data is recorded and the purpose for which this data is used

## **Support and monitoring the application of the Policy and Procedure**

The Council has conducted a full Equality Impact Assessment on this policy and is satisfied that its application should not result in a differential and negative impact on any groups of employees identified under the nine protected characteristics: age, disability, gender reassignment, race, religion or belief, sexual orientation, marriage and civil partnership, pregnancy and maternity.

## **Links to other strategies and policies**

Covert Surveillance Policy - [Covert Surveillance Policy - Guildford Borough Council Intranet](#)

ICT Policies and Procedures - [IT Security Policy by Protocol Policy Systems Ltd \(itpolicysystem.com\)](#)

Grievance Policy and Procedure - [Grievance Policy and Procedure Summary - Guildford Borough Council Intranet](#)

## **Review and Governance**

We will review this policy every two years or earlier if there are any changes to relevant legislation or appropriate working practices.

We will monitor the effectiveness and usage of this policy.

# Monitoring (Use of electronic systems) Procedure

## List of systems and the reasons for the usage and monitoring of them:

### Pass Use Data

- Information is used to monitor who accesses and leaves the Council buildings so that a record is kept in the event of a building evacuation or security breach.

### CCTV Cameras

- Information is recorded and stored for the protection and safety of Council Staff and security of Council vehicles and property

### Personal Safety Devices

- Information is recorded for the safety and security of staff who are lone workers or involved in roles that could potentially lead to situations of conflict

### Mobile/Landline Phones

- Information is recorded for emergency response purposes and could be used in relation to lone workers in the event of an emergency incident
- Landline phones - calls from reception desk may be recorded made either to listen to as part of workers training, or simply to have a record to refer to in the event of a customer complaint about an employee
- Systematically checking logs of telephone numbers called to detect use of premium-rate lines

### ICT Kit

- Cryoserver may be used in very exceptional circumstances to look at the information in an employee's email account if there is a reasonable suspicion, they have violated council policy or committed a criminal act
- Staff internet usage, although not routinely monitored, may be checked if an employee is suspected of spending disproportionate amounts of time on the internet or accessing inappropriate websites or for other prohibited activities.

### Vehicle Cameras

- These are used for Health and Safety purposes to ensure that correct ways of working are followed and potential follow up training
- They may also be accessed in the event of a claim for damage from a member of the public to provide evidence to defend the claim.
- There are no in cab cameras and sound is not recorded.

## Ignition off Monitoring

- Council vehicles with the vision camera system have the ability to shut down after 30 minutes of non-usage to save battery power

## Vehicle Trackers

- Trackers are used in vehicles for Health and Safety purposes should a Council vehicle break down on route or be involved in an accident
- These are also used as part of theft prevention and vehicle recovery
- They are also used as part of the onboard system to give live progress of work to allow active management of resources and task completion
- They are used aid investigation into accidents, particularly for pinpointing time and location.

## Access to the Data

The data can be accessed at the Council by the relevant Managers, Heads of Service and Directors, the Data Protection Officer, Human Resources and Health and Safety Officers.

Access can be given to external services such as the Police if a criminal act is being investigated.

In exceptional circumstances a solicitor or insurance officer acting on behalf of an employee may be granted access to such data – e.g., in the case of a compensation claim arising from a work accident

Where the system allows for a login and record of access to the system this will be recorded by the system and a record kept. If an electronic record cannot be kept within the system a record of the access will be recorded manually.

## Usage of Data in Disciplinary Investigations/Hearings

The Council will not use monitors or trackers directly to identify instances of staff misconduct without due cause, however, where an investigation is being carried out due to a concern over a member of staff's misconduct or misuse of equipment or it comes to light when addressing another concern or complaint that there is a concern with staff behaviour or performance the Council reserves the right to refer to this data as part of the disciplinary investigation and any subsequent hearing or appeal.

Any logging information used as part of the investigation or any subsequent hearing will form part of the evidence pack available to both parties.

## Staff Access to Records

A member of staff can raise a ticket via the Service Desk to request access to any monitoring data held in relation to them.

They also have the right to request formally the information via a Subject Access Request (SAR) as set out in the Data Protection Act 2018.

## **Grievance**

If a member of staff thinks that their information is being monitored/recorded incorrectly they should in the first instance raise this informally with their manager.

If this does not resolve the situation, they are then able to raise it formally through the Council's Grievance Procedure. [Grievance Policy and Procedure Summary - Guildford Borough Council Intranet](#)

If it is found information/data has been accessed or viewed inappropriately, individuals would be subject to a formal disciplinary investigation.

## **Training**

Training will be provided on the policy and procedure for staff and new staff will be asked to review this policy and procedure as part of their Induction.

## **Policy/Procedure Review**

The Monitoring (Use of Electronic System) Policy and Procedure will be reviewed every two years in line with the Council's approach to policy review. Any additional updates will also be taken in relation to changes in relevant legislation or appropriate working practices.

Where an employee needs help reading, understanding or engaging in the policy and procedure because English is not their first language, or they have learning difficulties or a disability which affects their ability in this area, Human Resources will arrange for someone to assist them. This will apply to the whole process and the support will include reading and explaining letters or documentation. To access this support the employee must ask Human Resources as otherwise they may not be aware of the need.