

## Annual Review of Moto CCTV Requirements

In line with our obligations under the 1998 Data Protection Act, the Moto Board has reviewed the on-going business requirements for the operation of CCTV and other monitoring and surveillance systems in the estate on 13<sup>th</sup> July 2016.

It was agreed that Tim Moss will continue to perform the role of "Information Controller" and have the legal responsibility for the ownership and operation of these systems.

The Moto Operating Board ("Board") considered the need for CCTV, surveillance and monitoring systems and their appropriate uses and has decided that such systems are still required and appropriate for:

- (a) the prevention and detection of crime;
- (b) the protection and safety of Moto, its customers and staff; and
- (c) the protection of the business interests of Moto, for example by:
  - (i) the monitoring of premises to ensure compliance with licences (for example, in relation to adult gaming centres);
  - (ii) the monitoring of premises in order to provide effective customer service;
  - (iii) to support car park charging, via a number plate recognition system (currently operated at Moto's sites by a third party on behalf of Moto);
  - (iv) to support the training and development of employees, and in some circumstances, for use in disciplinaries and grievances; and
  - (v) for use in investigation of complaints and/or health and safety matters.

In addition, the Board confirmed that in respect of any CCTV or other surveillance or monitoring systems used or proposed, it will ensure that:

- (a) The most appropriate technology is in place, both to achieve the purpose of the system and in order to ensure the protection of personal data; and
- (b) Where any new monitoring system is proposed for any purpose (both where current or new technology may be used) a privacy impact assessment will be carried out before implementation, in order to establish whether the system is appropriate and how best to operate it.

Moto reviewed all of its CCTV policies and procedures in January 2016 and has circulated the updated documents to all of the nominated system users in the business. Nominated Users within the business were also briefed in January.

Following an annual review and assessment of the systems in the estate in March 2016, it was agreed that the systems are of a satisfactory standard to meet the requirements outlined above. It was also noted that, in relation to prevention and detection of crime, CCTV is also used in conjunction with other crime prevention measures, such as monitored alarms systems and improved lighting, in order to achieve Moto's objectives.

The Board has carefully considered the privacy implications for both its customers and staff when making this decision. Moto has a clearly defined CCTV, Surveillance and Monitoring Systems Code of Practice, clear signage, and a customer information leaflet which explains the Moto policy for CCTV data subject access requests. To date, no public concerns have been formally raised with the Moto Board, so we have concluded that the systems in use are not too intrusive and that the use of CCTV and other monitoring and surveillance systems continues to be appropriate for our business.



**Tim Moss**

**Chief Executive and Information Controller**

13<sup>th</sup> July 2016