

## Annual Review of Moto CCTV Requirements

In line with our obligations under section 7 of the 1998 Data Protection Act, the Moto Board reviewed the on-going business requirement for the operation of CCTV systems in the estate on 10<sup>th</sup> April 2013.

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.

It has decided that CCTV systems are still required for the prevention and the detection of crime and for protecting the safety of customers and staff in the amenity buildings, forecourts and car parks. Images are routinely provided to the police and law enforcement agencies in order to support investigations and subsequent prosecutions.

Additional uses and benefits include the use of live-feed cameras for the monitoring of adult gaming centres in order to ensure that they are not being used by minors and capturing low resolution still images of queue lengths at selected units for the purpose of improving customer service. Cameras are also used to monitor compliance to the age restrictions and time of day constraints around the sale of alcohol in some stores. Third parties also operate number plate recognition systems on Moto's sites in order to support car parking charging on behalf of Moto, but no Moto employees have access to these images. CCTV is not used for any other purpose.

Following an annual review and assessment of the systems in the estate in March 2013, it was agreed that the systems are of a satisfactory standard to meet the requirements outlined above. However, CCTV is used in conjunction with other crime prevention measures such as monitored alarms systems and improved lighting in order to achieve these objectives.

Moto reviewed all of its CCTV policies and procedures in April 2013 and has circulated the updated documents to all of the nominated system users in the business.

The Board carefully considered the civil liberties and privacy implications for both its customers and staff when making this decision. Moto has a clearly defined code of practice for the use of CCTV, clear signage and a customer information leaflet which explains the disclosure policy. To date, no public concerns have been formally raised with the Moto Board so we have concluded that the systems in use are not intrusive that and the use of CCTV continues to be appropriate for our business.



**Tim Moss**

**Chief Executive and Information Controller**

10<sup>th</sup> April 2013