

# Monitoring Policy

**Starfish 9 Ltd Monitoring Policy-2022- Issue 2**  
(Last Review Jan 2022 - Next Planned Review Jan 2023)

# Monitoring

## What this policy covers

This policy applies to employees, workers and contractors.

This policy sets out the Company's approach to monitoring, provides information relating to the types of monitoring used and the Company's obligations in relation to such monitoring and in introducing additional monitoring.

## The Company's responsibilities

You should be aware that the Company may carry out monitoring of employees, workers and contractors.

Monitoring may be necessary either to allow the Company to perform its contract with you or for the Company's own legitimate interests. The Company's reasons for monitoring include:

- Security and the prevention and detection of crime
- Ensuring appropriate use of the company's telecommunications and computer systems
- Ensuring compliance with regulatory requirements
- Monitoring attendance, work and behaviour;

## Types of monitoring

The monitoring carried out may include:

- Monitoring of premises using video cameras
- Monitoring e-mails and analysing e-mail traffic
- Monitoring websites visited by staff using company systems
- Recording telephone calls and checking call logs
- Monitoring the use of company vehicles via vehicle-tracking systems
- Entry and exit systems, including the use of biometric data such as fingerprints
- Tracking via mobile devices

The Company may use information gathered through monitoring as the basis for disciplinary action.

If disciplinary action results from information gathered through monitoring, you will be given the opportunity to see or hear the relevant information in advance of the disciplinary meeting.

The Company will ensure data collected through monitoring is processed in accordance with the Company's Data Protection Policy and data protection legislation and, in particular, it will be kept secure and access will be limited to authorised individuals.

### Additional monitoring

The Company reserves the right to introduce additional monitoring. 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
- Where appropriate, consult with affected staff in advance of introducing the monitoring
- Weigh up the benefits that the monitoring is expected to achieve against the impact it may have on staff

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

### Covert monitoring

If the Company has reason to believe that certain employees, workers or contractors are engaged in criminal activity, the Company may use covert monitoring to investigate that suspicion. In such instances, any monitoring will take place under the guidance of the police and will be carried out in accordance with Data Protection legislation.

**Name:** John Jessimer

**Signed:** 

**Position:** Managing Director

**Date:** 7 January 2022

