



MONITORING POLICY

Employee monitoring covers monitoring of employees' use of telephones, fax, e-mails, Internet use, recording of images of employees by video and vehicle location monitoring. Monitoring may include the following:

- checking e-mails to ensure the system is not abused;
- checking websites visited by employees using Company systems;
- recording telephone calls;
- monitoring use of Company vehicles by vehicle tracking systems.

Monitoring Without Employees' Knowledge

The Company will not monitor employees without their knowledge, unless the Company has reason to believe that employees are engaged in criminal activity.

In such instances, any monitoring will take place under the guidance of the Police and will be carried out in accordance with the Data Protection Act 1998.

Monitoring With Employees' Knowledge

The Company reserves the right to introduce monitoring from time to time. 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 possible, consult with affected employees in advance of introducing the monitoring; and
- weigh up the benefits the monitoring is expected to achieve against the impact it may have on employees.

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

If disciplinary action results from information gathered through monitoring, the employee will be given the opportunity to see or hear the information in advance of the disciplinary meeting and make representations about it.

The Company will ensure data collected through monitoring is kept secure, and access is limited to authorised individuals.

Telephones

If the Company monitors telephones it will make employees aware of this. The Company will make available upon request a telephone in a private area, not subject to monitoring, for employees to make urgent personal calls.