

# **Covert Recording Policy**

#### 1. Purpose

This policy outlines the rules and expectations regarding covert recordings within the workplace to ensure compliance with UK employment law, data protection regulations, and workplace privacy standards.

## 2. Scope

This policy applies to all employees, contractors, visitors, and any other individuals operating within company or client premises or engaging in work-related activities.

## 3. Definition of Covert Recording

Covert recording refers to any audio, video, or other means of capturing conversations or actions without the explicit knowledge or consent of all parties involved.

#### 4. Prohibition of Covert Recording

Employees and other individuals are strictly prohibited from making covert recordings in the workplace, including but not limited to:

- a) Meetings, interviews, and discussions with colleagues, managers, or customers.
- b) Private conversations between employees or any individuals on company or customer premises.
- c) Disciplinary, grievance, or performance-related meetings without prior authorisation.

### 5. Exceptions

Covert recording may only be permissible in exceptional circumstances where:

- a) It is legally authorised under UK law (e.g., law enforcement investigations).
- b) It has received prior approval from senior management and is deemed necessary for legitimate business reasons.

# 6. Consequences of Breach

A breach of this policy may result in disciplinary action, up to and including dismissal, depending on the severity of the violation. Unauthorised covert recordings may also lead to legal consequences under UK data protection and privacy laws.

#### 7. Handling of Legitimate Recordings

Where recordings are permitted, they must be:

- a) Conducted transparently with informed consent.
- b) Stored securely and used only for their intended purpose.
- c) Compliant with GDPR and the Data Protection Act 2018.







# 8. Reporting Concerns

Employees who suspect unauthorized covert recordings should report their concerns to HR or senior management for appropriate investigation.

# 9. Review and Compliance

This policy will be reviewed regularly to ensure ongoing compliance with legal and regulatory requirements.

For any questions regarding this policy, please contact HR.

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