

Purpose

In the course of its business, Enviro Waste Services Limited (“**EnviroNZ**”) collects, stores and uses personal information about its employees and contractors (“**workers**”) using various technologies. This statement explains in further detail how EnviroNZ uses these technologies and handles this personal information.

Further information about how EnviroNZ collects, stores and uses personal information, and your rights of access, can be found in the Privacy Policy.

Video Footage

At any time, EnviroNZ may implement and use video recordings (including from site based CCTV or vehicle technology) to the extent necessary to achieve the following purposes (“**Purpose**”):

- Protecting the health and safety of the public and our workers by ensuring safe work practices and reviewing incidents that may occur in the course of, or in relation to, our business.
- Protecting EnviroNZ equipment and premises. For example; where there is the likelihood or suspicion of vandalism, theft or unauthorised activity.
- Protecting the environment and sites that the company uses, to ensure sound environmental management practices are maintained.
- Investigating incidents and complaints, including disciplinary investigations.
- Operations management, such as improving routing and work design and reporting to customers and stakeholders.
- Worker training needs and assessment, performance management, and compliance with the company’s standard operation procedures (AOP’s and road rules, including but not limited to use of video recordings for internal training purposes.
- Assisting the New Zealand Police (or other authority) with investigations.

Workers will be made aware that the recording is taking place, unless the purpose for making the recording (e.g. to monitor suspected theft) would be defeated by informing the worker or it is otherwise impracticable in the circumstances.

Site Technology

EnviroNZ sites may be monitored by technology that records and collects video footage (CCTV). The type of technology used will vary depending on the site. Audio is not recorded by CCTV systems.

CCTV footage will primarily be used to monitor safety and operational aspects of the sites, but may be used for any other Purpose outlined above. The type of technology used will vary depending on the site.

Where CCTV technology is used, workers and members of the public will be made aware of CCTV by notices informing them of this at the entrance to the site.

Access to CCTV footage will be restricted to those managers and workers who have a genuine and reasonable requirement to view the footage, and footage will only be accessed and monitored so far as is necessary to achieve the Purpose. Access in the case of networked systems is controlled by the Property and Security Manager.

In the case of remote standalone systems, access is controlled by the site manager.

Some sites will have CCTV that is owned and operated by third parties e.g. the local authority. This policy is only applicable to CCTV that is owned and operated by EnviroNZ.

Vehicle Technology

EnviroNZ vehicles may contain technology to assist the driver, assess and ensure safety of workers, to report on and assess operational performance and ensure the quality of our service, or for any other Purpose as set out above. The technology in each vehicle may vary and will depend on many factors including the type of vehicle, type of work or location of the vehicle. No audio is recorded by the video systems.

The features and specifications of technology will vary and may include electronic dispatching, route management systems and cameras on, in and around the vehicle, movement tracking systems (i.e. EROAD) or other GPS capable systems.

There are three types of video recording systems. Live streaming, recording to an SD card and delayed streaming. Further details of the capabilities of each video system can be found in the camera system guides which can be found in the branches or on the Hub. These maybe amended from time to time.

Video footage is not monitored continuously, however video footage may be viewed by Driver Trainers, Operations employees or Managers when there is a genuine and reasonable requirement to do so and only to the extent that is necessary to achieve the Purpose. Access to vehicle camera technology is controlled by the Fleet IT Co-Ordinator.

Access to video footage is limited to those select Driver Trainers, Health and Safety Advisors, Customer Service, Operations employees and Managers who may, from time to time, have a reasonable requirement to access the video footage. Where video footage is recorded and stored from vehicles, it is stored on a secure server with restricted access. If an incident or alleged incident occurs in a vehicle, it may be necessary for EnviroNZ to collect and store video recordings in order for the recording to be accessible for further analysis. Video footage will not be held indefinitely and will only be retained for as long as reasonably necessary to fulfil the relevant Purpose.

Live streaming and/or recorded footage may be used by Driver Trainers to assess a worker's driving behaviour, for the purposes of training needs and assessment, performance assessment and management and compliance with SOP's and road rules. Workers will be made aware of the capabilities of the camera systems in their truck and if the vehicle they are using is fitted with a live stream system. (For further information refer to the specifications in the Camera System Guides). Driver Trainers using live streaming will complete an observation form each time they make a live stream observation. If during an observation they observe a breach of standard operating procedures, road rules or other concern about the workers behaviour is identified. They will use the Driver Breach Escalation process to inform local management.

Workers have the right to view footage recorded from their vehicles. If they wish to view footage they should follow the process for access to information in this policy.

Tampering with Technology

The technology that is placed in and around sites or the vehicle is to be considered in the same way as any other safety device and must not be tampered with. This includes, but is not limited to:

- Disabling any cameras, removing or tampering with SD cards.

- Deliberate actions to obscure or alter the view of any cameras.
- Tampering with or covering of video cameras, Guardian devices or alarms, ERoad devices, CCTV systems, biometric readers or any other device.

Tampering with technology may be considered serious misconduct, and may result in a disciplinary investigation that could lead to dismissal.

Complaints Process

A worker who has concerns about how their personal information has been obtained, stored, handled or distributed, should bring their concerns to their manager's attention. If the worker remains concerned, they should forward their concerns in writing to the HR Manager or the company's Privacy Officer. Following a review of the concerns raised, the HR Manager may instigate an investigation.

The complaint and the outcome of the investigation are to be recorded and included on the worker's personal file (as applicable).

Under the Act, employees may make complaints directly to the Privacy Commissioner or Ombudsman if they believe their privacy has been breached.

Changes to the Policy

This policy may change from time to time and for any reason. Where appropriate, you will be notified of these changes.

A record of changes made to this Privacy Policy is set out below:

Date	Description of Change
21 September 2020	Document renamed from "Privacy Policy" to "Worker Privacy Statement – Technology and Data"
October 2018	Document Created