



Ten golden rules for the use of hidden surveillance camera's¹

1. Request consent from the Works Council (OR) prior to instituting the decision to use (hidden) cameras to capture images of misconduct by employees.²
2. Ensure that employees are made aware that (hidden) cameras may be in operation. The information may, for instance, be included in the personnel rules or communicated via a circular.
3. Make recordings on an occasional basis should it prove necessary to provide evidence that an employee is, or has been, guilty of misconduct.
4. Where such options are available, less rigorous means of detecting misconduct should be employed.
5. Avoid intrusion in areas such as changing rooms or toilets where employees' privacy is important.
6. Use surveillance cameras in as targeted a way as possible.
7. Use of a camera should be for a limited period only.
8. Prevent misuse of video images.
9. Evaluate any incriminating video material as soon as possible with the employee concerned.
10. Delete or destroy information which is not relevant.

¹Hidden surveillance cameras differ from permanently-mounted security cameras. Permanent security cameras are clearly visible and intended for monitoring persons, buildings, premises, business operations and production processes. Separate rules apply to the use of security cameras.

² Consent is required as the use of surveillance cameras constitutes an element of a personnel control system. (Article 27.1, subsection I, of the Dutch Works Councils Act)