



Document Status:	GDPR
Review Cycle:	2 year or as required

Change History	Author	Changes Summary
14/02/2022	AB	Adopted as an enhancement to GDPR
26/04/24	AB	Use of CCTV in Training Section added

CCTV Policy

The nursery/charity CCTV surveillance is intended for the purposes of:

- promoting the health and safety of children, staff and visitors
- protecting the nursery/charity building and resources.

The system comprises of **12** fixed cameras. These are placed around the nursery/charity, inside and outside, but **not** in the toilets or changing areas. This is to ensure the dignity of children is maintained.

The use of CCTV to control the perimeter of the nursery/charity for security purposes has been deemed to be justified by the nursery/charity management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

Monitoring

The CCTV is monitored centrally from the nursery/charity office and is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the nursery/charity's use of CCTV and how it complies with the Act. The nursery/charity complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained to understand their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. A copy of this CCTV Policy will be provided on request to staff, parents and visitors to the nursery/charity and will be made available on the website and in the policy file.

Location of cameras

The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to the nursery/charity's property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Storage and retention

The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue. The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel.

Supervising the access and maintenance of the CCTV System is the responsibility of the Chief Executive or Deputy. In certain circumstances, the recordings may also be

viewed by other individuals. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. Files will be stored in a secure environment with a log of access to recordings kept.

Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

When accessing images two authorised members of staff must be present. A written record of access will be made. A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act / GDPR. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The nursery/charity will respond to requests within 14 calendar days of receiving the request. The nursery/charity reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

Where footage contains images relating to 3rd parties, the nursery/charity will take appropriate steps to mask and protect the identities of those individuals.

Complaints

Complaints and enquiries about the operation of CCTV within the nursery/charity should be directed to the Chief Executive in the first instance.

Responsibilities

The Chief Executive will ensure:

- That the use of CCTV systems is implemented in accordance with this policy
- They oversee and co-ordinate the use of CCTV monitoring for safety and security purposes
- That all CCTV monitoring systems will be evaluated for compliance with this policy
- That the CCTV monitoring is consistent with the highest standards and protections
- They review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- They maintain a record of access (e.g. an access log) to or the release of files or any material recorded or stored in the system
- That the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- That all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals
- That external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"

- That monitoring footage are stored in a secure place with access by authorised personnel only
- That images recorded are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- That camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- That under certain circumstances, the CCTV footage may be used for training purposes (including staff supervisions) or for parents to view child transitions.

Use of CCTV Footage for Training Purposes

Examples of CCTV footage that could be used for training purposes:

- Safety related Incident prompting incident management training
- General practice improvement training

Considerations to be taken into account...

- Is anyone in the footage (including members of the public) identifiable? If no, continue. If yes, consider the below.

- If they are identifiable, can you obtain their consent to use the footage, or can their image be obscured/pixelated?
- What is the setting of the incident recorded and could it be considered contentious?
- Is there any bad practice in the footage, and would it be appropriate to use this in training?
- Are there any welfare issues to consider for those viewing?
- Is the footage going to be used informally in a debrief setting, or as part of a larger/more formal training event?

Could you consider whether something else could be used instead of CCTV for the training, such as;

- Training videos using actors
- Verbal process of the event
- Reflection sessions with staff
- Diagrams

Reasons for and Agreement for the use of CCTV in training must be documented in the CCTV log.

This policy was adopted on	Signed on behalf of the nursery/charity 	Date for review
30/04/24		2 yrs