



Suitable premises

3.9 CCTV policy

Policy statement

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) systems at School House Nurseries.

The systems are made up of a number of fixed cameras located around the nursery buildings, all of which are owned and operated by the nursery. Images are monitored and recorded and will be used in strict accordance with this policy. This policy follows Data Protection Act guidelines. These are placed around the nursery, inside and outside, but **not** in the toilets or changing areas. This is to maintain children's dignity.

Data Protection

- CCTV digital images, if they show a recognisable person, are Personal Data and are covered by the Data Protection Act 1988.
- It is recognised that images are sensitive material and subject to the provisions of the Data Protection Act 1998; the Nursery owners are responsible for ensuring day to day compliance with the Act.

Monitoring

- The CCTV is monitored centrally from the nursery office and is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act. This policy outlines the nursery's use of CCTV and how it complies with the Act. The nursery complies with 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 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 and will be made available on the website and in the policy file.



A description of our CCTV system

- The system comprises of: fixed position cameras, monitors and public information signs.
- Cameras will be located at strategic points, principally outside the main entrance, within each of the rooms and in the outdoor classroom.
- No camera will be hidden from view.
- Signs will be prominently placed at strategic points and at the entrance to the building to tell staff, parents/carers, visitors and members of the public that a CCTV installation is in use.

Purpose of the system

- The system has been installed by the nursery with the primary purpose of ensuring the safety of children in our care, and helping to ensure the safety of all staff, parents/carers and visitors consistent with respect for the individuals' privacy.
- To assist in managing the nursery and develop best practice (although they are never used as a substitute for correct staff deployment and care of the children).
- To protect the nursery building and resources.
- The system will not be used to provide recorded images for the internet.

Recording

- Images captured by the system will be recorded in the office, twenty-four hours a day throughout the year.
- Digital recordings are made using digital video recorders operating in real time mode.
- Images will normally be retained for 30 days from the date of recording, and then automatically over written.

Access to images

- Access to images will be restricted to those staff who need to have access in accordance with the purposes of the system. 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.

- 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.
- Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:
 - Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.
 - Emergency services in connection with the investigation of an accident.
- Supervising the access and maintenance of the CCTV system is the responsibility of the registered person / manager. 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.

Access to images by a staff member, parent/carer or visitor

- CCTV digital images, if they show a recognisable person, are Personal Data and are covered by the Data Protection Act. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to the prohibitions on access also covered by the Data Protection Act. They do not have the right of instant access and they must abide by the Data Protection procedures.
- A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Nursery owners.
- The Nursery owners will then arrange for viewing of the images and subsequent discussion of content.
- The Data Protection Act gives the Nursery owner the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- If it is decided that a data subject access request is not to be complied with, the reasons will be fully documented and the data subject informed, whenever possible in writing, stating the reasons.

Complaints

- Complaints and enquiries about the operation of CCTV within the nursery should be directed to the Manager of the nursery in the first instance.

Responsibilities

The Manager (or Deputy) 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.
- That if safeguarding concerns arise from monitoring the footage, appropriate safeguarding actions are taken e.g. contacting the Local Authority Designated Officer (LADO). See the Safeguarding children and child protection policy for procedures in the event of a staff allegation.
- 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 is 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 supervision, staff training etc.) or for parents to view child transitions.

This policy was updated and reviewed in:

Reviewed date	Name	Signature
September 2015	Stuart Watt	
May 2016	Stuart Watt	
August 2016	Stuart Watt	
September 2016	Stuart Watt	
April 2017	Stuart Watt	

April 2018	Lindy Baldwin	
August 2018	Lindy Baldwin	
April 2019	Lindy Baldwin	
May 2019	Stuart Watt	
January 2020	Stuart Watt	
January 2021	Stuart Watt	
January 2022	Stuart Watt	
March 2023	Stuart Watt	
June 2023	Stuart Watt	