



CCTV Policy and Procedure

1. Purpose

Apple Day Nursery now operates a Close Circuit Television System (CCTV). The purpose of the surveillance system is to assist the nursery in achieving its management objectives for quality of care, and security objectives of ensuring the personal safety and protection of children, staff, parents and visitors to the setting.

2. Scope and Legal Responsibilities

Apple Day Nursery will conform to the provisions of the Data Protection Act 1998 and the Data Protection (Amendment) Act 2003 in relation to the use of CCTV.

3. Policy & Procedure

Data Controller: The Data Controllers are Kristy Renshaw, the Nursery Manager and Paul Chiesa, the Director. They are responsible for the data/information collected using CCTV.

Location

There are 25 cameras and the following areas are currently monitored by CCTV:-

Outside areas.

- (a) Nursery entrance - main gate and front door.
- (b) The front of the nursery building.
- (c) The nursery gardens - front and back
- (d) Stairwells.
- (e) The bin store and car park.

- (f) Each of the six classrooms.
- (g) The manager's office and reception room.
- (h) Kitchen
- (i) Laundry room

CCTV Monitor

Apple Day Nursery has one CCTV monitor which is located in the Office. These monitors will be on throughout the day.

Fairness

Management of Apple Day Nursery respects and supports the individual's entitlement to go about his/her lawful business and this is the primary consideration in the operation of CCTV. There will however inevitably be some loss of privacy with the use of CCTV cameras, and they will be used to monitor activities in the classrooms, address concerns, deal with complaints and support investigations. New employees will be informed during induction that a surveillance system is in operation. Parents will be informed when they enrol their child. They will be informed of the purpose of the CCTV and what it can and cannot be used to monitor.

Role of the Management

- To ensure the system is always operational
- To ensure that servicing and repairs are carried out as necessary to the system
- To respond, to any individual's written request to view a recording that exists of his/her children.
- To ensure prominent signage is in place that will make individuals aware that they are entering a CCTV area.
- To ensure that areas of privacy (toilets etc) are not monitored using CCTV

- To ensure confidentiality is maintained at all time.

Viewing Recordings

Management will not be under any obligation to allow a third party to view a recording, if however management do allow the viewing to take place, this will be done so in the presence of the Nursery Manager or Director. This is to protect other children/staff that may be present on the recording.

Retention

Information will remain on the hard drive of the system and will be recorded over when the memory is full - memory will usually start to be over written after about 4 weeks.

Access to Recordings

There is no obligation for Apple day Nursery to comply with a request that it considered unreasonable, vexatious or involves disclosing identifiable images of third parties. Third parties must give consent. Recordings will however be provided to third parties, if required by law or by authorised agencies such as the Police.

- Requests for access to recordings must be made in writing
- Sufficient information must be provided to locate the relevant recording, a specific date and reasonable time window
- Viewings will take place, if appropriate, in the presence of management
- Management will have 21 days to respond
- If a copy of CD is given to a third party that third party must sign a declaration form that they will not share the CD with anyone else, copy it or use it for unauthorised purposes.
- An incident report will be completed for each incident requiring investigation
- Copies will only be issued by Kristy Renshaw - Nursery Manager or Paul Chiesa - Director

If access to or disclosure of the images is allowed, then the following should be documented:

- a. the date and time at which access was allowed or the date on which disclosure was made
- b. the identification of any third party who was allowed access or to whom disclosure was made
- c. the reason for allowing access or disclosure
- d. the extent of the information to which access was allowed or which was disclosed

Where the images are determined to be personal data images of individuals (other than the data subject) they may need to be disguised or blurred so that they are not readily identifiable. If the system does not have the facilities to carry out that type of editing, an editing company may need to be hired to carry it out. If an editing company is hired, then the manager or designated member of staff needs to ensure that there is a contractual relationship between the Data Controller and the editing company.

Data Subject Access Standards

All staff involved in operating the equipment must be able to recognize a request by data subjects for access to personal data in the form of recorded images by data subjects. Data subjects may be provided with a standard subject access request form which:

- a) indicates the information required in order to locate the images requested
- b) indicate that a fee will be charged for carrying out the search for the images

- c) The maximum fee which may be charged for the supply of copies of data in response to a subject access request is set out in the Data Protection Acts, 1988 and 2003
- d) Ask whether the individual would be satisfied with merely viewing the images recorded
- e) Indicate that the response will be provided promptly following receipt of the required fee and in any event within 40 days of receiving adequate information

Policy Date: February 2020	Date to be reviewed: February 2021
Name of Signatory: Kristy Renshaw	Position: Manager
Signature:	<i>Signed on behalf of Apple Day Nursery</i>