



## **CCTV POLICY**

The Management Team at Monkey Puzzle Day Nursery recognises that the use of CCTV has become a common feature of our daily lives. While the use is generally accepted, operators have a responsibility to those whose images are caught on camera. The business complies with the Information Commissioner's CCTV Code of Practice; this is to ensure it is used responsibly and safeguards both trust and confidence.

The use of CCTV and the associated images is covered by the General Data Protection Regulation.

### **Purpose**

The nursery may use CCTV equipment for one or more of the following purposes:

- The prevention, investigation and detection of crime
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings)
- Safeguarding public, pupil and staff safety
- Monitoring the security of the site
- Enabling parents to see their child at play during the nursery day
- Supporting the record keeping of children's learning

### **Identification**

In areas where CCTV is used, the nursery will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area(s).

The signs must:

- Be clearly visible and readable
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme
- Be an appropriate size, depending on context

### **Location**

- Cameras are located in those areas where the nursery has an identified need (see purpose above). The nursery's CCTV system is used solely for the purposes identified and adequate signage will identify where it is in use
- The nursery does not use the CCTV system for covert monitoring

### **Type of Equipment**

The nursery's standard CCTV cameras record visual images only

### **Administration**

The data controller has responsibility for the control of images and deciding how the CCTV system is used.

**The nursery has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used.**



Operators and employees with access to images must be aware of the procedures that need to be followed when accessing recorded images. Training is provided to highlight their responsibilities along with the restrictions in relation to access and disclosure of recorded images under the CCTV Code of Practice.

The nursery undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit should include a review of:

- Its stated purpose
- The locations
- The images recorded and documented
- Storage length
- Deletion

### **Image Storage, Viewing and Retention**

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified.

Access to live images is restricted to Management and parents who have been instructed in how and when they may use the equipment, logging on remotely and who has signed a document to agree never to disclose any PIN or personal code with which to access images.

The recorded images are viewed for monitoring purposes and for the safe movement of persons through designated areas which are identifiable as previously stated.

The nursery reserves the right to use images captured on CCTV where there is activity that the nursery cannot be expected to ignore such as criminal activity, potential gross misconduct, safeguarding breaches or behaviour which puts others at risk. Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only.

The Data Protection Act does not prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The nursery ensures that images are not retained for longer than is necessary. Once the retention period has expired, the images are removed or erased.

### **Disclosure**

Disclosure of the recorded images to third parties can only be authorised by the Data Controller.

Disclosure will only be granted:

- If its release is fair to the individuals concerned
- If there is an overriding legal obligation (e.g. information access rights)
- If it is consistent with the purpose for which the system was established

### **Note:**

Disclosure may be authorised to law enforcement agencies (even if a system was not established to prevent or detect crime), if withholding it would prejudice the prevention or detection of crime.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.



### **Subject Access Requests**

Please refer to the Data Protection Policy for details of how you are expected to handle subject access requests.

The nursery owner is responsible for ensuring the nursery complies with its responsibilities:

- in relation to guidance on the location of cameras
- ensuring the date and time references are accurate
- for suitable maintenance and servicing to be undertaken to ensure that clear images are recorded
- to protect cameras from vandalism in order to ensure that they remain in working order