

**CCTV Policy**

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| Policy Review Schedule |
| Date policy agreed by staff |  | Date policy agreed by Management Committee |  |
| Policy Review Schedule | Every 2 years | Date for Review |  |
| Signed by Chair of Committee |  |
| Signed by Managing Directors |  |

**Eltham Green Nursery Closed Circuit Television (CCTV) Policy**

**Introduction**

We at Eltham Green Nursery recognise that the use of CCTV systems can be intrusive towards privacy. Therefore, a policy has been created to protect our children, staff, families and visitors.

The nursery complies with the Information Commissioner’s Code of practice to ensure it is used responsibly and safeguards both trust and confidence its continued use. The usage of CCTV and associated images is covered by The Data protection Act and GDPR.

This policy will be reviewed regularly. Whenever new equipment is installed, a risk assessment will be put into place. Our aim is to review this policy every two years.

**Aims**

The purpose of this CCTV system being installed is to assist our nursery in reaching these objectives:

* To protect children, staff, parents and visitor against harm to their person and/or property.
* To increase a sense of personal safety.
* To protect the nursery building and assets.
* To support the police in preventing and detecting crime.
* To assist in establishing cause of accidents and other incidents, preventing reoccurrence.
* To assist in managing the nursery.

**Purpose**

The purpose of our policy is to regulate the management, operation and use of our CCTV system. The CCTV system used by our nursery comprises of:

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| --- | --- | --- | --- | --- |
| Camera type | Location | Sound | Recording capacity | Swivel/fixed |
| Hikvision Colourvu range | Two cameras outside in back garden, covering our main play area and rear fire exit. | No | Yes | Fixed |

**Statement of Intent**

The CCTV system will seek to comply with both the requirements of the Data Protection Act and Commissioner’s Code of Practice.

We will treat the system, all information, documents and recordings (both those contained and those subsequently used) as data protected under the act.

The system has been designed so far as possible to avoid coverage of private homes, gardens or other areas of private property.

Material or knowledge which is secured because of our CCTV will not be used for any commercial purposes.

Images will only be shared with the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure the system will give us maximum effectiveness and efficiency, but it is not possible to guarantee that our system will cover or detect every single incident taking place within the area being covered.

As required by the Code of practice of the Information Commissioner, warning signs will be clearly visible around the inside of our building.

Recorded images will only be retained long enough for any incident to come to light and the incident to be investigated. Data will record for between 3-4 weeks before being auto erased.

**System Management**

Access to the CCTV system and data shall be password protected.

The CCTV system will be managed by Michelle Wawrzewski and Louise O’Shea, Managing Directors of the company, known as the system managers. They will take responsibility for ensuring access is restricted and dealt with accordingly.

The data collected will only be available to the Managing directors (Michelle and Louise) and all appropriate members of the Management Committee.

The CCTV is designed to operate for 24 hours each day, every day of the year. The nursery will not guarantee that it will continue to work throughout these hours.

The system managers will check and confirm regularly the efficiency of the system and to ensure that all equipment is recording properly, and cameras remain functional.

Cameras have been positioned to achieve the best possible intentions as set out in this policy by providing clear, useable images.

Unless an immediate response to events is required, cameras will not directly record an individual, their property or a specific group of individuals, without authorisation which is in accordance with the Regulation of Investigatory power Act 2000.

Where a person other than those mentioned above, requests access to the CCTV data or system, the System managers must satisfy themselves of the identity and legitimacy of purpose of any person making this request. If in any doubt, the request will be refused.

Details of all visitors will be recorded in a logbook including time, date of access and details of images viewed and the reasons for this.

**Downloading captured Data onto Other media**

To maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:

* Before use, downloaded media must be cleaned of any previous recordings.
* The systems managers will register the time, date and reference of the media that was downloaded.
* Any media downloaded for the purpose of evidence must be sealed, witnessed and signed by the system managers. It will then be dated and stored separately in a secure lockable safe. If material downloaded is not copied for the police before being sealed, a copy may be made later providing it is resealed, witnessed and signed by the system managers, before being dated and returned to the secure, lockable safe.
* All archived media must have the reference noted.

Images may be viewed by the police, system managers and other authorised applicants for the prevention and detection of crime.

However, if one of these people are called as a witness to an offence and where the data may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

If any downloaded media is released for viewing, the police or other authorised applicants will record the details of this.

Should images be required as evidence, a copy may be released to the police under the procedures as described in this policy.

Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the nursery, and downloaded media (and the images contained thereon) are to be treated in accordance with data Protection legislation.

The nursery retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person.

On occasions when the media may be required for court, this will be produced from the secure, lockable safe remaining in its sealed bag.

The police may require the nursery to retain the media for possible use of evidence in the future. Such downloaded media will be properly indexed and stored securely by the police until needed.

Applications received from outside bodies (solicitors, parents etc) to view or release images will be referred to the Managing Directors or a senior member of the Management Committee before a decision is made.

**Complaints about the Use of CCTV**

Any complaints in relation to our CCTV system should be addressed with the Managing Directors (Michelle or Louise)

**Request for Access by the Data Subject**

The Data Protection Act provides Data Subjects- those whose images have been captured by the CCTV system and can be identified- with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to Michelle Wawrzewski or Louise O’Shea- Managing Directors of the nursery.

**Public Information-** Paper copies of this policy will be available from the nursery office.