

**CCTV Policy**

1. **Introduction and Purpose of this Policy**

The purpose of this policy is to regulate the management, operation, and use of the CCTV system at Bitterne Community Preschool.

The organisation currently operates a system of cameras for recording both externally and internally in selected areas. All cameras have recording capacity, and there is a live feed into the kitchen area at the preschool. Details of the locations of the cameras are kept with the Preschool Manager.

The following procedures have been put in place to ensure that the CCTV system is used only for the purpose for which it has been installed. This code of practice is in line with Data Protection Act guidelines.

Failure by any staff member to comply with this Code of Practice, whether wilful or not, will be investigated and may lead to action through the disciplinary procedures. This could include failure to prevent any unauthorised user from gaining access to the known data.

The Preschool Manager will have overall responsibility for ensuring that the system is used correctly in the best interests of the preschool and the community and is subjected to regular evaluation.

The organisation recognises that closed-circuit television (CCTV) systems can intrude upon privacy. However, the policy will be reviewed by the Management Committee within Bitterne Community Preschool every two years or whenever changes in legislation are compiled or equipment replacement.

1. **Objectives**

The purpose of the CCTV system is to assist Bitterne Community Preschool in reaching these objectives:

(a) To protect children, staff, and visitors.

(b) For the purpose of security and safety.

(c) To increase a sense of personal safety and reduce the fear of incidents while on the premises.

(d) To protect the preschool buildings and assets.

(e) To assist relevant authorities in preventing and detecting incidents.

(f) To assist in identifying, apprehending, and prosecuting offenders.

(g) To assist in establishing the cause of incidents and prevent reoccurrence.

(h) To support in the management and safeguarding of children’s wellbeing.

1. **Statement of Intent**

The CCTV system at Bitterne Community Preschool is specifically for monitoring vulnerable areas of the preschool site and allowing authorised staff to attempt to identify individuals following a suspected or reported incident. Such incidents may include security breaches, vandalism, unauthorised entry, inappropriate behaviour, or any action that could disrupt the normal functioning of the preschool.

Preschool staff will be responsible for ensuring that all cameras and monitors are functioning correctly and will report any malfunctions or damage immediately to the Preschool Manager, who will arrange for immediate repairs as a matter of priority.

The CCTV system will seek to comply with the requirements of the Data Protection Act and other relevant regulations. The preschool will treat the system, all information, documents, and recordings as data protected under the Act. The system has been designed to minimize observation of adjacent private homes, gardens, and other areas of private property.

Materials or knowledge secured through CCTV will not be used for any commercial purpose. Personal data may be shared upon request and with the approval of the Preschool Manager to assist relevant authorities in responding to emergencies involving children or staff under surveillance. The system will retain recorded images only long enough for any incident to come to light and be investigated, typically no more than one month unless there is a compelling need to retain images for a longer period, such as an ongoing investigation or legal action.

No unauthorised use of the cameras or monitoring equipment will be permitted and attempts to do so may constitute a disciplinary offense in accordance with the preschool's disciplinary procedures. Training in the use of the equipment by an authorised trainer will be provided to all designated staff. Staff who have not been trained will not be allowed access to the system. Permission to review images will only be granted by the Preschool Manager. The Preschool Manager will periodically check the procedures to ensure that the systems are being adhered to.

**4. Operation of Systems**

(a) The overall scheme will be administered and managed by the preschool manager on behalf of the preschool.

(b) Day-to-day management of the system will be with the preschool manager and deputy manager.

(c) Staff will only access the recording equipment and monitors as nominated by the Preschool Manager.

(d) No recordings will be made on personal devices other than those provided by Bitterne Community Preschool for the purpose internal investigations.

1. **Monitoring Procedures**

(a) Camera surveillance will be conducted as deemed necessary.

1. **Covert surveillance**

(a) The Preschool will not engage in covert surveillance.

The police may request to carry out covert surveillance on Preschool premises, such covert surveillance will require the consent of a Justice of the Peace or Magistrate. Accordingly, any such request made by the police will be requested in writing and the preschool will seek legal advice.

**System Management**

Access to the CCTV system and data shall be password protected. The CCTV system will be administered and managed by the preschool manager, who will act as system manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy.

The CCTV system is designed to be in operation 24 hours a day, every day of the year. If the system needs to be stopped partially or completely, this will be agreed upon in advance with the Preschool Manager. If the system fails to operate properly, this failure will be reported to the Preschool Manager for immediate rectification.

Cameras have been selected and positioned to achieve the objectives set out in this policy, by providing clear, usable images. Unless an immediate response to events is required, cameras will not be directed at an individual, their property, or a specific group of individuals.

 **Sharing of CCTV Images**

Images may be viewed by relevant authorities for the prevention and detection of incidents. However, it shall be referable, if possible, for the Preschool Manager to withhold viewing of the data until asked to do so by relevant authorities if one of these people may be later called as a witness to an incident and where the data content may be used as evidence. A record will be made and maintained in a logbook of the viewing or release of any downloaded media.

**Notification, Signage and Awareness**

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 preschool. 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.

**Complaints about the use of CCTV**

Any complaints related to the preschool's CCTV system should be addressed to the Preschool Manager.

**Request for Access by the Data Subject**

The Data Protection Act provides Data Subjects – those whose image has 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 such data should be made to the Preschool Manager.

Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised or with the explicit consent of the other people identifiable in the footage.

A person should provide all the necessary information to assist the preschool in locating the CCTV recorded data, such as the date, time and location of the recording.

In giving a person a copy of their data, the preschool may provide a still/series of still pictures, a digital video, or a disk with relevant images.

**Data Protection Impact Assessment**

Prior to the adoption of any new CCTV system or where an existing system is identified as not having been assessed, a comprehensive DPIA must be undertaken.

The Surveillance Camera Commissioner’s (SCC) CCTV DPIA format will be used as the standard template. It is accessible via the DPO and on the SCC’s website;

https://www.gov.uk/government/publications/data-protection-impact-assessments-for-surveillance-cameras

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| This policy was adopted by | Bitterne Community Preschool  |  |
| On | 28/11/23 |  |
| Date to be reviewed | 28/11/25 |  |
| Date of last review |  |
| Signed on behalf of the provider |  |
| Name of signatory | James Muehlnickel |
| Role of signatory (e.g. chair, director or owner) | Chairperson  |