

The Hollies Childcare Facility CCTV Policy and Procedure

Approver / Authoriser

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Responsible Individuals

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Revision History

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Issue 1	10 th September 2024	Annual Document Review
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Acronyms & Abbreviations

Acronym/Abbreviation	Definition
CAO	Chief Administration Officer
CCTV	Close Circuit Television System

Glossary

Term	Definition
The Hollies	Refers to The Hollies Childcare Facility

Table of Contents

		Page Number
1	Aims and Objectives	4
2	Scope and Legal Responsibilities	4
3	Policy and Procedure	4
4	CCTV Monitor	4
5	Fairness	4
6	Role of the Management	5
7	Viewing Recordings	5
8	Retention	5
9	Access to Recordings	5
10	Data Subject Access Standards	6

1 Aims and Objectives

The Hollies Childcare Facility operates a Close Circuit Television System (CCTV). The aim of the surveillance system is to assist the facility 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

The Hollies 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 and Procedure

Data Controller:

The Data Controllers are Mrs Sarah Hearne – Management Committee Trustee and Sarah Murray – Chief Administration Officer. They are responsible for the data/information collected using CCTV.

Location:

There are 4 cameras and the following areas are currently monitored by CCTV:-

Outside areas;

- (a) Main entrance – main gate and front play area.
- (b) Rear entrance – play area to the rear of the building
- (c) Path to the left hand side of the building
- (d) Boiler room entrance and right hand side of the building

4 CCTV Monitor

The Hollies has one CCTV monitor which is located in the main office. These monitors will be on throughout the day and night.

5 Fairness

Management of The Hollies 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 within the setting, 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.

6 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 child/ren.
- 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 times.

7 Viewing Recordings

Management will not be under any obligation to allow a third party to view a recording, Data Protection Officer - Mrs Hearne or the CAO – Mrs Sarah Murray. This is to protect other children/staff that may be present on the recording.

8 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 approximately 31 days.

9 Access to Recordings

There is no obligations for The Hollies 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 Mrs Sarah Hearne – Data Protection Officer or Sarah Murray – CAO.

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 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 Data Protection Officer of CAO needs to ensure that there is a contractual relationship between the Data Controller and the editing company.

10 Data Subject Access Standards

All staff involved in operating the equipment must be able to recognise 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.