

### **Purpose of using CCTV in Bright Beginnings**

Bright Beginnings has a legitimate interest to operate a CCTV system within the setting. The main purpose is to provide a safer and more secure environment for the benefit of children in our care, staff, parents/carers and visitors, whilst demonstrating respect for an individual's privacy. In particular, the system will enable us to:

- Safeguard our children, parents/carers, and staff.
- Assist in the prevention and detection of crime.
- Identify any activities or events that may warrant disciplinary proceedings being taken against staff and assist in providing evidence to the General Manager where gross misconduct may be involved or where the behaviour of an individual puts others at risk.

We recognise that images are sensitive material and is subject to data protection legislation, with which we will comply. We will also have due regard to the Information Commissioner's Office (ICO) code of practice for use of CCTV. A Legitimate Interest Assessment and a Data Protection Impact Assessment have been undertaken and are available, upon request, from the General Manager.

### **Bright Beginnings will ensure:**

- Those with access to CCTV images are aware of and conversant with the CCTV policy and the ICO's CCTV code of practice.
- Those with access to the CCTV system follow agreed University and Centre processes in respect of data security.
- The date and time stamp on recordings is accurate.
- The system is maintained and serviced in accordance with manufacturer's recommendations.
- Images are not disclosed to the media or posted on the internet.
- The use of CCTV and the CCTV policy is reviewed annually.
- Proactive checks and audits are conducted on a regular basis to ensure that procedures are being complied with.

### Location of CCTV cameras in Bright Beginnings

Cameras will be located in areas that children are present such as play rooms, the main entrance and outdoor children's gardens. Cameras will be positioned so that they provide clear images whilst ensuring that maximum privacy, dignity and respect is afforded to children, and avoiding the capture of persons not visiting the premises. Cameras are not located in any child's bathroom, adult bathroom, kitchen, offices or staff rest area.

### The CCTV recordings

- The CCTV system is a localised system with no internet access. No images will ever be broadcasted or streamed over the internet to any third party or parents.
- Recordings will be of images only, without sound.
- Recordings will be made on a daily basis around the clock all year.
- Images captured will be recorded and stored securely within the Centre.
- Access to real time images will be limited to a designated monitor within an office with restricted access in the Centre. The monitor will not be visible from outside the Centre.
- Images will normally be retained for a period of 31 days from the date of recording and then automatically over written by the system.

### Access to recordings

- Only the Centre management team<sup>1</sup> will be able to access and control access to the images.
- In general, access will be restricted to those individuals who need to have access in accordance with the purposes of the CCTV system. When accessing the system, they will be under the guidance and supervision of a member of the Centre management team.
- Disclosure of recorded material will only be made available to third parties in strict accordance with the purposes of the system and is limited to the following:
  - a. Law enforcement agencies where images recorded would assist in a criminal enquiry.
  - b. Prosecution agencies.
  - c. People whose images have been recorded and retained unless disclosure to the

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<sup>1</sup> Namely, the General Manager, the Quality and Practice Manager, the Systems Manager and the Systems Manager.

## 008: Use of CCTV at Bright Beginnings

individual would prejudice criminal enquiries, criminal proceedings or infringe the data protection rights of others.

- d. Emergency services in connection with the investigation of an accident.
- e. A disciplinary panel in the event of formal disciplinary action being taken.

### Notification of CCTV coverage

- Notices will be displayed in the Centre to inform staff, parents/carers and visitors that CCTV is in use throughout the building and in outdoor play areas.
- A copy of the CCTV policy will be made available to all staff and parents/carers of children who use our services on the Centre's website.
- The Centre's website, prospectus and parent Inductions will include a statement about the use of CCTV in the Centre.

### Requests for copies of images

- Individuals have the right to request a copy of any CCTV footage in which they are in focus and/or clearly identifiable. There is however, no right of immediate access to images for anyone who believes they have been recorded by the CCTV system. Any such request can be made to the University of Leeds's data protection officer<sup>2</sup> who will supply the individual with that footage within 30 days should the request be deemed valid.
- The CCTV system has the facility to obscure on still snapshot images any identifying features of a person captured on CCTV. Where copies of images are required consideration will be given as to whether other persons whose images have been captured (including children) are blurred out to maintain their privacy. Where individuals could still be identified from the images, we may not be able to disclose the information in order to protect their individual rights.
- The Centre has the discretion to refuse any request for information if the request would mean disclosing information about other individuals who might be identifiable from the

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<sup>2</sup> Contact details: [DSAR@leeds.ac.uk](mailto:DSAR@leeds.ac.uk); 0113 34 37346.

## 008: Use of CCTV at Bright Beginnings

requested footage, with the following exceptions:

- The other individuals have consented to the disclosure.
- It is reasonable to comply with the request without the individuals consent.
- There is an overriding legal obligation, such as a court order, or where such access could prejudice a criminal investigation or impede the apprehension or prosecution of offenders.

### Complaints

If you have a complaint about either the operation of the CCTV system or any perceived failures to comply with this CCTV policy please contact the Centre General Manager in the first instance.

<b>Reviewed by</b>	Angela Hynes
<b>Date</b>	January 2025