



CCTV POLICY

Rationale

The Management Team at Colourbox Montessori School Ltd. recognises that the use of CCTV has become a common feature of our daily lives. Whilst the needs of the Company in protecting property and possessions are important, the rights of employees and families using the nurseries are paramount. This policy outlines the ways in which the Company fulfils its responsibilities, including ensuring that the rights and privacy of all people legitimately accessing the nursery premises are protected. The use of CCTV and the associated images is covered by the General Data Protection Regulation (UK GDPR). This Company (Colourbox Montessori School Ltd.) is registered with the Information Commissioner's Office ('ICO') and complies with the ICO CCTV Code of Practice.

Why do we have CCTV at our nurseries? The Company uses external (not internal) 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).
- Monitoring the security of nursery premises

Location and scheduling: Cameras are located in those areas where the Company has an identified need – currently at our Haverhill, Newmarket, Barrow and Red Lodge sites. The Company's CCTV system is used solely for the purposes identified and adequate signage identifies where it is in use. The Company's cameras record sound and vision. The Company does not use the CCTV system for covert monitoring. The CCTV alert system is motion-controlled and uses an automatic timing system so that motion alerts are only received outside the Company's normal operating hours.

Administration and maintenance: The nursery has notified ICO of both the name of the data controller and the purpose for which the images are used. Susie Norman, Director of Colourbox, is our named Data Controller and she has responsibility for the control of images and deciding how the CCTV system is used, in accordance with the ICO CCTV Code of Practice. The Company undertakes regular audits to ensure that the use of CCTV continues to be justified.

The audit includes a review of:

- Stated purpose for use of CCTV at our nursery premises.
- The locations where we have CCTV installed.
- The images which are recorded and documented.
- Time period for retention of images.
- Deletion of images.

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. Where access to live images is required this will be restricted to the Director of Colourbox, Susie Norman. 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. Images will be deleted after 10 days where no breach of nursery premises has been identified. Once the retention period has expired, the images are removed or erased. This process is irreversible. Images retained for evidential purposes will be retained only for the length of time necessary and will then be deleted.

Where the privacy of neighbouring properties may be compromised we use a 'blocking out' feature to ensure that images which may be irrelevant to the security of Colourbox premises are not recorded.

Disclosure of the recorded images to third parties can only be authorised by the Data Controller. All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

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. 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 or behaviour which puts others at risk.

Subject Access Requests Please refer to the Company's Data Protection Policy for details of how to make subject access requests.

This policy will be reviewed in April 2022