

CCTV POLICY

INTRODUCTION

Tigers Childcare has overall responsibility for the protection of Tigers property and equipment as well as providing a sense of security to our colleagues, children in our care and other individuals who come in contact with the childcare facilities.

SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. This policy applies to all colleagues and visitors to Tigers Childcare facilities.

PURPOSE OF THE POLICY

The purpose of the CCTV Policy is to regulate the use of CCTV in each childcare facility in the monitoring of the external and internal areas of each premises.

PURPOSE OF THE CCTV SYTEM

Closed circuit television (CCTV) cameras are used on our premises, and on client premises, for security purposes.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV for other purposes is prohibited under this policy.

A CCTV system is installed internally and externally in each childcare facility to enhance security of the building as well as creating a mindfulness among colleagues, that a security system is in operation to deter bullying, crime, vandalism and theft, as an aid to Health and Safety.

Notwithstanding this express purpose we reserve the right to use any evidence obtained through CCTV in any disciplinary matter. We will ensure all personal data obtained in this way is processed in line with the current Data Protection Legislation. You may refer to the colleague privacy notice for more information on the data we hold, the reasons we hold it and the lawful basis which applies.

Information obtained through video monitoring may only be released when authorised by the Management.

LOCATION OF CAMERAS

The location of cameras is a key consideration. Tigers Childcare has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

Cameras are located in the following areas:

- a) The front door
- b) Each room
- c) Garden area

Adequate signage is also prominently displayed in appropriate locations.

DATA PROTECTION

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts of 1998 and 2003 and GDPR, 2018. Under the Data Protection Acts a data controller is the individual who controls and is responsible for the keeping and use of personal information in manual files or in a computerised form. The data controller in respect of images recorded and stored by the CCTV system in each Tigers Childcare centre is the Centre Manager on behalf of the Directors of the Company.

The recorded footage and the monitoring equipment will be securely stored in the office area and personal data recorded and stored by the CCTV system will only be available to the data controller.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. Viewing of incidents/accidents will be strictly limited to the incident itself.

RETENTION OF CCTV FOOTAGE

In accordance with data protection legislation, CCTV images recorded and stored by the CCTV system is retained for no longer than is necessary. All recordings are retained for a maximum of 28 calendar days. After this time, they are safely deleted.

When used in conjunction with an investigation or as evidence, recordings may be retained specifically in that context until the matter is resolved. After this period, images are safely deleted.

Camera operators shall act with utmost integrity at all times and be mindful of exercising prejudgments which may lead to complaints of the system being used for the purpose other than those for which it is intended. Images shall not be copied (e.g. by using a mobile phone).

SUBJECT ACCESS REQUEST

Individuals whose images are recorded and stored by the CCTV system have the right to request and receive a copy of personal data processed by the system. Where the image/recording identifies another individual, those images may only be released where they can be redacted/ anonymised so the other person is not identified or identifiable.

All requests for data access must be in writing and the individual should provide all the necessary information to assist the Company in locating the CCTV recorded data, such as the date, time and location of the recording.

The Company aims to respond promptly and at latest within one month of receiving a valid request.

Recorded material is handled with care and in a confidential manner to ensure complete regard for individual privacy.

ACCESS

In relevant circumstances, CCTV footage may be accessed:

- a) By Tusla and / or any other statutory body charged with child safeguarding; or
- b) To assist the company in establishing facts in cases of unacceptable colleagues' behaviour, in which case, the parents/guardians will be informed
- c) To individuals (or their legal representatives) subject to a court order

Access request by An Gardaí Síochána shall be processed where such processing is necessary and proportionate for preventing, detecting, investigating or prosecuting criminal offenses. Verbal requests are sufficient to allow for the viewing of the CCTV footage. Verbal requests for copies of CCTV footage must be followed up with a formal written request.

COMPLIANCE

All colleagues who are responsible for implementing, managing, operating or using the CCTV system must do so only as authorised and in accordance with this Policy. Any failure to comply with this Policy may be a disciplinary offense.

RELATED/SUPPORTING DOCUMENTS/RELATED LEGISLATION

- Data Control Policy
- Data Retention Policy
- Data Protection Act 1998
- Data Protection (Amendment) Act 2003
- Colleague Privacy Notice
- Parent Privacy Notice

COMMUNICATION PLAN

A copy of all policies will be available during all hours of operation to staff members and parents/guardians in the Policy Folder located in each facility.

Parents/guardians may receive a copy of the policy at any time upon request.

Policy Review

- **Policy created:** November 2016
- **Policy updated:** March 2022
- **Policy reviewed:** Annually