CCTV Policy

Pippa Pop-ins Nursery Schools

Pippa Pop-ins 165 New King's Road (Ofsted ID: EY449873)

Pippa Pop-ins 233 New King's Road (Ofsted ID: EY449869)

Pippa Pop-ins 430 Fulham Road (Ofsted ID: EY449872)

Pippa Pop-ins 5 Kensington Place (Ofsted ID: EY489562)

Pippa Pop-ins 91-93 Princedale Road (Ofsted ID: 2857426)

Primary person responsible for the implementation and monitoring of this policy:	Ben Murray, Nazish Usman, Joanne Allen
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Pippa Pop-ins®
Nursery Schools

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1. Scope and Application

1.1 This policy applies to:
Pippa Pop-ins 165 New King's Road (Ofsted ID: EY449873) ("**Pippa Pop-ins**")
Pippa Pop-ins 233 New King's Road (Ofsted ID: EY449869) ("**Pippa Pop-ins**")
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1.2 Under this policy all employees, including directors, apprentices, casual workers, whether on permanent or temporary contracts are collectively referred to as '**staff**'.

1.3 This policy does not form part of any contract and Pippa Pop-ins may amend it at any time.

2. Policy Aims

2.1 The aim of this policy is to:

2.1.1 outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;

2.1.2 ensure that the legal rights of our children, parents, staff and visitors relating to their personal data are recognised and respected; and

2.1.3 assist staff in complying with relevant legal obligations when working with personal data.

2.2 Pippa Pop-ins uses CCTV cameras to view and record children, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

2.3 For staff, a breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

2.4 The CCTV system is administered and managed by Pippa Pop-ins, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact Rachel Watson, Principal.

2.5 This policy will be subject to review from time to time, and should be read with reference to Pippa Pop-ins' Data Protection Policy. We will also review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

3. Objectives

3.1 Pippa Pop-ins' purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, Pippa Pop-ins believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

3.1.1 To protect children, parents, staff and visitors with regard to their personal safety and to act as a deterrent against crime.

3.1.2 To protect Pippa Pop-ins' buildings and equipment, and the personal property of children, parents, staff and visitors from damage, disruption, vandalism and other crime.

3.1.3 To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.

3.1.4 To monitor the security and integrity of Pippa Pop-ins' sites and deliveries and arrivals.

3.1.5 To monitor staff and contractors when carrying out work duties.

3.1.6 To monitor and uphold discipline among children.

3.1.7 To assist in day-to-day management, including ensuring the health and safety of children, parents, staff and visitors.

3.1.8 To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.

3.1.9 To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

4. Positioning

4.1 Locations for the CCTV cameras have been selected, both inside and outside our premises, that Pippa Pop-ins reasonably believes require monitoring to address the above objectives.

4.2 Adequate signage has been placed in prominent positions around the premises to inform children, parents, staff and visitors that they are entering a monitored area, identifying Pippa Pop-ins as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

4.3 These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of Pippa Pop-ins' monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

5. Maintenance

5.1 The CCTV system will be operational 24 hours a day, every day of the year.

5.2 Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

5.3 The CCTV system will be checked and (to the extent necessary) serviced no less than annually.

6. Supervision

6.1 We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, HR and safeguarding/pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

6.2 Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

7. Storage

7.1 In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security.

7.2 Given the large amount of data generated by the CCTV system, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf. We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

7.3 Images will be stored for 30 days, and permanently automatically over-written unless Pippa Pop-ins considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).

7.4 Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

8. Requests for disclosure

8.1 Individuals have the right to request access to personal data that Pippa Pop-ins holds about them (otherwise known as a "subject access request", on which please see the Pippa Pop-ins' Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

8.2 In order to respond to a subject access request, Pippa Pop-ins will require specific details including (as a minimum) the time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

8.3 Pippa Pop-ins must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

8.4 No images from our CCTV cameras will be disclosed to a third party without express permission being given by Pippa Pop-ins. The following are examples of circumstances in which Pippa Pop-ins may authorise disclosure of CCTV images to third parties:

8.4.1 Where required to do so by the police or any relevant local or statutory authority;

8.4.2 To make a report regarding suspected criminal behaviour or a safeguarding incident;

8.4.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

8.4.4 To assist Pippa Pop-ins in establishing facts in cases of unacceptable behaviour, in which case, the child's parents will be informed as part of the Pippa Pop-ins' management of a particular incident;

8.4.5 To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);

8.4.6 To the Pippa Pop-ins' insurance company where required in order to pursue a claim (for example for damage to insured property); or

8.4.7 In any other circumstances required under law or regulation.

8.5 Where images are disclosed, a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

8.6 Pippa Pop-ins reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

9. Complaints and queries

9.1 Any complaints or queries in relation to the Pippa Pop-ins' CCTV system, or its use of CCTV, or requests for copies, should be referred to the Principal.

9.2 For any other queries concerning the use of your personal data by the Pippa Pop-ins, please see the Pippa Pop-ins' applicable Privacy Notice.