



CCTV Policy

Bryn Coch Club is monitored by a Closed-Circuit Television (CCTV) system. Responsibility for the monitoring of the system lies with Clare Murphy (Club Manager). Responsibility also lies with our setting to raise awareness of our CCTV policy, as well as ensuring staff training is up to date and reviewed regularly. The purpose of CCTV usage in this setting is for the protection of children and staff and builds into our larger framework of policies covering security and emergency lockdown measures. CCTV is a common safety feature used in premises across the UK, providing many settings and business premises with the adequate safeguarding measures to protect their occupants. We recognise that, as a CCTV operator, we have UK GDPR responsibilities which act to protect our children and staff, as well as members of the public. This policy outlines how we are using CCTV in line with the Information Commissioner's CCTV guidance.

Note: Bryn Coch Club is registered with the Information Commissioner's Office (ICO)

Data Protection Law

UKGDPR sets clear principles organisations of all sizes must follow. It says that personal data must be:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept in identifiable form for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage."

All organisations of all sizes must be able to demonstrate compliance with these principles. This CCTV policy is a helpful part of demonstrating compliance.

The UK GDPR singles out some types of personal data as likely to be more sensitive, and gives them extra protection. These include:

- race
- ethnic background
- political opinions
- religious beliefs
- trade union membership
- genetics
- biometrics (where used for identification)
- health
- sex life or orientation

As Bryn Coch Club we understand that CCTV usage therefore has to be fair and proportionate. We have taken the following actions to ensure the law is followed:

The CCTV system:

The CCTV installed in Bryn Coch Club has been installed by AGS and the system installed is Hanwha ARN – 810S – eight channels

- *Where are the cameras located? Main club building (inside), Sensory room, IT/TV room, small hall in school (club times only) outside classroom, club enclosed play area, small yard behind club gates and bottom of main yard-ship play area and bottom of school field.*
- *The cameras are not placed in/near any bathroom or changing areas.*
- *Signs are displayed on all exit doors and club building windows.*
- *Please contact Clare Murphy (Club Manager) to raise any queries*
- *All staff members must inform Clare Murphy (Club Manager), Corin Ellis (Person in Charge pre-school -wraparound) Michelle Birchall (Person in Charge Breakfast club and afterschool club) if someone enquires about CCTV system*
- *The main system is monitored from the club managers office*
- *Sound monitoring is turned off.*
- *Monitors are not on public display and only accessible to relevant staff,*

CCTV usage:

Our setting employs a closed CCTV system which is easily accessible. We recognise that our CCTV is likely to capture personal information about individuals in shot of the cameras, such as faces and movements. We understand that significant data protection rules come with this. The law states that any individual may request CCTV footage of themselves via a **Subject Access Request (SAR)**, and the owner of the CCTV system has 20 days to provide the footage free of charge. If the footage requested contains images of other parties, we will endeavour to ascertain their consent before releasing the footage. If we are unable to, guidance from the Information Commissioners Office states we may redact or remove footage or disguise the identity of third parties.

Data protection does not prevent us from sharing our CCTV footage with regulatory authorities such as the police, and we will endeavour to share as much information with regulatory authorities as possible if requested.

Note: The ICO's guidance for small organisations states: People who submit requests for footage that contains their personal information have a right to receive that information under data protection legislation. When installing CCTV, you should make sure you choose a system that allows you to easily locate and extract personal information in response to subject access requests. You should also ensure it allows for the redaction of third-party information, where this is necessary. If your CCTV system has this functionality, it will likely enable you to comply with your data protection obligations. However, if your CCTV system does not have this functionality, you still need endeavour to comply with your obligations. However, you should only disclose the footage if you have the other people's consent to do so, or if it's reasonable to do so without their consent.

CCTV retention:

Our CCTV is retained for a period of **(20)** days. After this time period, the CCTV recording is deleted.

Purpose of the system:

CCTV has been installed on the nursery premises principally for the purposes of security, ensuring safety for all individuals on site. Our CCTV system will monitor:

- Children and staff safety to potential external threats.
- Staff interaction with Children within the setting.
- Assisting in an event that may require a disciplinary proceeding.
- Identifying potential risks to children in the setting and making changes to rectify potential risks.
- Protecting against theft and damage to the building.
- Preventing criminal behaviour.
- Assisting in the detection of crime.

All individuals have rights under the Data Protection Law

<i>Bryn Coch Club</i>	
On:09.9.2025	
By: Clare Murphy	Position: Club Manager
Date of planned review: 01.01.2026	