

**POLICY NO.33 CCTV POLICY****REV: 08 REV. DATE: 25.07.2022**

Killorglin Community Childcare operate a CCTV system within the grounds and the building that is known as Scamps & Scholars to provide a safe environment for the children, parents / guardians and staff involved in the operation of Scamps & Scholars. The CCTV system is also used to provide additional security for the building and its grounds.

The system will be operated by the centre in the following manner:

**Access**

- Access to recorded footage and the CCTV system in general will be limited to authorised staff in the service who have a direct role in Child Care (i.e. not Caretaker, Cleaning or Kitchen Staff). Access will only be utilized if circumstances deem necessary but will include child protection issues, to verify circumstances of accidents /incidents but not reserved to just those two areas.
- Authorised Officers for Part VII of the Child Care Act regarding Pre-School Inspection Team.
- Authorised Officers carrying out a Child Protection Investigation (Gardai, HSE Social Worker).
- Supervised access by a mechanic carrying out authorised repair on works to CCTV equipment.
- Authorised officers carrying out a criminal investigation (Gardai)
- Those that make a legitimate Data Protection request

Recorded footage will be afforded to the above parties if requested to do so however the data controller will satisfy him/herself that the persons requesting recorded footage are bona fide and that a genuine investigation is underway.

**A log of access**

The data controller will maintain a log of access to the CCTV system.

**Storage of recordings**

Recordings will be stored on the system's hard-drive which will be located in a secure location with restricted access as outlined above. The recordings will be

held on the system for between 28- 30 days where, thereafter they will be over recorded automatically.

### **Data Controller**

The designated data controller will be the Centre Manager on behalf of the Board of Directors.

### **Staff & Customer Access**

Any person whose image has been recorded has a right to be given a copy of the information recorded. If a parent / guardian requests the same information for their child or a child in their care the same process outlined will apply.

To exercise that right, a person must make an application in writing to the manager. The manager will respond to such a request and he / she will respond within the required time line as per GDPR.

The person requesting a copy of information recorded must supply all relevant information such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify the individual, that image may not be considered to be personal data and no information will be provided.

The format of such information will be a series of still photos from the recorded footage unless the person requesting the information or their child is the sole “occupant” of the video that has been recorded or if the manager deems it appropriate to provide such video footage. In this case the information may be presented in a series of still photos and/or video footage.

Video footage may be accessible if it is reasonable & possible to redact all other persons in the clip to the extent where they cannot be identified. Where this is not possible this center will revert to a “still image” submission.

The costs involved in completing a request must be of a reasonable nature and correspond to the requirement to access the data.

### **Recording of video & sound**

It should be noted that the current system within the centre only records video and has no capacity to record sound.

If circumstances warrant it and in line with GDPR specific footage of specified instances/incidents/accidents may be retained separately from the general system in a secure location.

**APPROVAL DATE:** \_\_\_\_\_

**IMPLEMENTATION DATE:** \_\_\_\_\_

**SIGNED:** \_\_\_\_\_  
(On behalf of the Board of Directors)