

CCTV Policy



Background

Kidsize uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the Clubhouse building in order to provide a safe and secure environment for staff and visitors, and to prevent the loss or damage to property.

CCTV surveillance at Kidsize is intended for the purposes of:

- protecting the building and assets, both during and after operational hours;
- promoting the health and safety of staff and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and ensuring that the centre's rules are respected so that it can be properly managed.
- ensuring children in the setting are cared for appropriately
- supporting investigations into incidents or concerns, including disciplinary action where necessary
- reducing the risk of child abduction
- enhancing safety and security for children, staff, parents and visitors.

The system comprises 3 fixed external cameras (Doorbell, Car Park and Garden) and 2 fixed interior cameras in areas that cover doors (Hallway and Disco Room).

The CCTV system is operated through the system Ring and records video and audio only when triggered by motion sensors or accessed by live view on the app. Ring footage is accessed through the Ring app in which only the Company Director and Manager have access. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. Through the Ring system data is stored for 30 days only unless downloaded. Footage will only be downloaded if required in line with any of the previously outlined purposes.

Kidsize's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines Kidsize's use of CCTV and how it complies with the Act.

ICO Registration Number: ZA458059

Kidsize complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the centre, including Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other related legislation.

Data Protection Impact Assessments

Where new CCTV systems or cameras are installed, Kidsize will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.

Location of Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

Kidsize will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The centre will make every effort to position cameras so that their coverage is restricted to the premises, car park & garden.

CCTV will not be used to monitor areas where individuals would have a reasonable expectation of privacy such as bathrooms.

Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

Notification

A copy of this CCTV Policy will be provided on request to staff and visitors of Kidsize and will be made available on the centre's website.

The location of CCTV cameras will also be indicated and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

Appropriate locations for signage will include:

- at entrances to premises i.e. external doors
- at or close to the internal camera

Storage and Retention

The images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment.

Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the company director. The company director may delegate the administration of the CCTV System to another staff member.

In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Access

Access to the CCTV system and stored images will be restricted to authorised personnel only.

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

In relevant circumstances, CCTV footage may be accessed/shared with:

- The police where Kingswells (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Kingswells Community Centre property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the supervisor in establishing facts in cases of unacceptable behaviour, in which case, the activity leader/parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To Kidsize's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

Kidsize will respond to requests within 30 calendar days of receiving the request.

Kidsize reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

In giving a person a copy of their data, the centre will provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

Where footage contains images relating to 3rd parties, Kidsize will take appropriate steps to mask and protect the identities of those individuals.

Complaints

Complaints and enquiries about the operation of CCTV within the centre should be directed to the Manager in the first instance.

Responsibilities

The Company Director (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Kidsize
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Kidsize
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to both visitors and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the centre and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded s are stored for a period not longer than 30 days and are then erased unless required as part of an investigation.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

Reviewed: 20th March 2026 By: Jenna Millar