

Gate/External CCTV Policy

Home-Grown in Malvern

1. Policy Statement

This policy outlines the safe, lawful, and proportionate use of Closed-Circuit Television (CCTV) installed on the external gates of the childminding premises. The purpose of CCTV is to support safeguarding, monitor access to the setting, and protect children, families, the childminder, and property. CCTV is used strictly in accordance with UK GDPR, the Data Protection Act 2018, and the Information Commissioner's Office (ICO) CCTV Code of Practice.

2. Purpose of CCTV

CCTV at the external gates is used solely for:

- Monitoring entry and exit points to ensure children's safety.
- Deterring unauthorised access to the premises.
- Supporting incident review relating to safeguarding or security.
- Protecting the childminder, children, families, and property.

CCTV is **not** used to monitor children's behaviour, staff performance, or any internal activity within the home.

3. Legal and Regulatory Compliance

The childminder acts as the **Data Controller** and ensures compliance with:

- UK GDPR and the Data Protection Act 2018.
- ICO CCTV Code of Practice.
- Human Rights Act 1998 (right to privacy).
- EYFS safeguarding requirements.

Lawful basis for processing: Legitimate interests (security and safeguarding).

4. Camera Location and Coverage

- Cameras are positioned **only on external gates and doors**.
- Coverage is limited to the immediate entrance area.
- Cameras must not capture neighbouring homes, gardens, or private property.
- Cameras must not intentionally record public pavements or roads unless unavoidable.
- Privacy masking is applied where required.

5. Signage and Transparency

- Clear signage is displayed at the gate stating:
 - CCTV is in operation.
 - Purpose: safeguarding and security.
- Parents are informed of CCTV use during registration.
- This policy is available to parents and visitors upon request and is published on the setting website.

6. Recording, Storage, and Retention

- Footage is stored securely using password-protected and encrypted systems.
- Access to footage is strictly limited to authorised individuals.
- Footage is retained for **up to 30 days**, unless required for a safeguarding or legal reason.
- Audio recording is disabled unless explicitly justified and documented.
- Secure deletion procedures are followed when footage reaches the end of its retention period.

7. Access to Footage

Access is restricted to:

- The childminder (Data Controller) and setting owner.
- Statutory agencies such as Police, Ofsted, or the Local Authority Designated Officer (LADO) when legally required.
- Parents, only if footage relates directly to their child and does not compromise the privacy of others.

All access requests are logged.

8. Use of Footage

Footage is reviewed only:

- Following a safeguarding concern.
- After a security incident.
- At the request of statutory agencies.

Footage is **not** used for:

- Monitoring children's behaviour.
- Monitoring staff performance.
- Sharing on social media.

9. Data Protection Impact Assessment (DPIA)

A DPIA is completed before installation or any significant change to the CCTV system. The DPIA includes:

- Purpose and justification.
- Assessment of privacy risks.
- Mitigation measures (camera angles, masking, signage).

- Evaluation of proportionality.

10. Prohibited Uses

CCTV must not be used for:

- Recording inside the home.
- Monitoring staff or children.
- Capturing neighbours' private property.
- Continuous recording without justification.
- Any purpose not stated in this policy.

11. Maintenance and Review

- Cameras are checked regularly for correct positioning and functionality.
- The policy is reviewed **annually** or sooner if legislation or guidance changes.
- The DPIA is updated if camera angles, equipment, or purpose changes.

12. Contact Details

Data Controller: Childminder (Denise Williams)

Address: (Home-Grown in Malvern, WR144PB)

Telephone: (07568 286873)

Email: (denisebw@hotmail.co.uk)

13. Approval and Review

Policy Created: (1st June 2026)

Next Review Due: (1st June 2027)

This policy supports the childminder's commitment to safeguarding, privacy, and lawful data handling within the Worcestershire regulatory context.