



The best start in life

Parent Handbook

Table of Contents

Section 1: Introduction

- 1.1 Welcome to Busy Bees US (p. 3)
- 1.2 Our Mission (p. 3)
- 1.3 Our Vision (p. 4)
- 1.4 Our Values (p. 4)
- 1.5 Curriculum (p. 4)

Section 2: General Policies

- 2.1 Communication (p.5)
 - 2.1a Our Customer Experience Team (p. 5)
 - 2.1b Parent Code of Conduct (p. 5)
- 2.2 Arrival and Departure (p. 7)
- 2.3 Absences (p. 7)
- 2.4 Toys and Electronic Devices from Home (p. 7)
- 2.5 Open Door Policy (p. 7)
- 2.6 Outdoor Play (p.8)
- 2.7 Discipline and Positive Guidance Policy (p. 8)
 - 2.7a Biting (p. 8)
 - 2.7b Dismissal (p. 9)
- 2.8 Nap/Rest Time (p. 9)
- 2.9 Babysitting (p. 9)

Section 3: Health and Safety

- 3.1 Medical Records (p. 10)
- 3.2 Communicable Illnesses (p. 10)
- 3.3 Nut Free Center (p. 11)
- 3.4 Fire Drills and Emergency Evacuation (p. 11)
- 3.5 Firearms and Weapons Policy (p. 11)
- 3.6 Smoking Policy (p. 11)
- 3.7 Child Abuse and Maltreatment (p. 11)

Section 4: CCTV System Policy

Section 5: State and Brand Specific Addendums

Section 1: Introduction

1.1 Welcome to Busy Bees US

Choosing a school to provide early years education and care for your child is one of the most difficult and important decisions that you will make. We are pleased that you have chosen us and will work diligently to provide the highest quality for you and your child. Here at Busy Bees US, everything we stand for revolves around providing the very best in learning and care for your children.

We would like you to consider us as an extension of home; a caring and nurturing place where your children are intellectually and emotionally stimulated by dedicated staff that are not only early childhood educators, but amazing people.

Busy Bees centers exist to turn the natural curiosity of young children into learning. Our programs provide children autonomy through choices, guided explorations, and multiple forms of expression. It creates awareness of self, others, cultural diversity, global stewardship, community, and the natural environments. Setting the foundation for self-aware, open-minded, well-rounded children to thrive in a dynamic, diverse, global society, with a love of learning.

Our educators are passionate and strive to deliver the very best care for every child. We follow a robust recruitment process and onboarding training to ensure the best delivery of our programs. Furthermore, we provide ongoing programming and safety training that enable our educators to provide learning in safe and joyful environments. Each child's safety and well-being is our top priority. Our educators support children's safe play experiences while encouraging them to explore, discover, and unleash their potential. Our educators are the ones who ultimately make our programs fun and interesting, and we trust them to make every day special.

One of the hallmarks of high-quality early years education and care is open communication between families and educators. We place great emphasis on partnering with our families throughout the educational process. We will provide an overview of our curriculum, monthly newsletters, and daily updates about your child. In addition to extensive informal interactions, we will also host formal Family-Teacher Conferences to showcase what your child has learned. Families are always welcome in our classrooms to share special interests and traditions, read a story, or just to visit.

The following material and information will hopefully provide you with a better perspective about our program, values, and general policies. We look forward to working with you to provide the best care and education for your child.

Kind Regards,
Mary Ann Curran
Chief Executive Officer
Busy Bees North America

1.2 Our Mission

To deliver high quality child care and exciting opportunities for learning that give every child a head start as they prepare for school.

1.3 Our Vision

To give every child the best start in life

1.4 Our Values

Care: We take care of the children entrusted to us and our dedicated staff. All are appreciated, and diversity is valued.

Service: We provide exceptional service and are integral to supporting families raising children.

Quality: We maintain the highest standards in care and safety and provide exceptional early years education.

Value: We provide outstanding value for our families.

1.5 Curriculum

Our curriculum regards children as competent and capable individuals, creating opportunities for curiosity and wonder, resulting in children who explore, discover, create, adapt, persevere, collaborate, lead, learn. Educators will be intentional in their interactions and create engaging learning opportunities through connecting, listening, observing, asking questions, inviting, facilitating, and collaborating with children.

Educators will plan activities based on the identified interests and inquiry of the children, organized according to the topics of building connections and creative discovery, physical literacy, STEM discovery, environmental stewardship, and global citizenship. Each day brings new learning opportunities as children are provided a framework within which they will make both self-directed and guided choices.

This approach to learning involves hands on exploration, guided questions, meaningful conversations, documentation of meaningful learning moments to launch further learning, individual learning discoveries and scaffolded learning activating a child's curiosity.

The benefits of this approach include the blossoming of child engagement, increased motivation to learn, and development of a love of learning. Our approach also encourages responsibility, decreases negative behaviors, promotes thoughtful actions, encourages pursuits of goals, and empowers independence.

Section 2: General Information

Our Parent Handbook is designed to acquaint you with our programming and present our policies. Please be advised that policies may be amended at any time.

2.1 Communication

We believe that communication builds the bridge that connects the family to our center. The center will use electronic media to communicate daily summaries of each child's activities as well as important center announcements and updates. General documents (ex: lunch menus, curriculum summaries, etc.) will also be communicated via electronic media and posted on Family Boards outside of the classrooms.

In the event a family does not have access to email, or otherwise wishes to receive printed copies of communications, please communicate this with the Center Director.

Online family satisfaction questionnaires are sent annually. These are a very important source for us to maintain the quality of our programs and we urge you to participate when requested. Additionally, we seek your input at any time and urge you to communicate any concerns or problems to your Center Director or Assistant Center Director immediately. Should you feel this leaves your concerns or problems unresolved, please do not hesitate to email your Area Director.

2.1 a Our Customer Experience Team

As part of our goal to achieve 100% customer satisfaction, we have a Customer Experience hotline and email address through which you can ask questions or share your comments or concerns if your Center Director has been unable to resolve them to your satisfaction. Our Customer Experience Coordinators will work with you to ensure that you are heard and understood, and if necessary, they will engage with our leadership team to make sure that your feedback is addressed and resolved. We also recognize how important it is to you that our teachers and administrators receive compliments, so we encourage you to share those as well so that we can personally acknowledge when they are doing a great job.

Our Customer Experience Coordinators are available during business hours, Monday-Friday. Give them a call at 1-800-423-8088 or email them at USCustomerExperience@BusyBeesUSA.com.

2.1 b Parent Code of Conduct

Busy Bees US recognizes the important role parents play in helping us maintain a safe, nurturing, and community-focused environment in which all children can learn, play, and thrive. All parents, caregivers, and visitors of our center collectively agree to act in a manner that emphasizes mutual respect, fairness, and equality. Individual needs and differences are recognized as being part of this collective process, and all individuals are required to work out all concerns and differences in a clear and reasonable manner. Busy Bees will not tolerate incidents of expressed

bias, discrimination, prejudice, or harassment. All parents, caregivers, and visitors must agree to abide by the following Code of Conduct.

Parents, guardians, and visitors agree to:

- Support a friendly and nurturing environment
- Maintain positive communication during interactions
- Follow the recommended procedures of addressing concerns
- Refrain from gossip and public criticism of our employees, the children in our care and Busy Bees families. Discussion of concerns and issues will be with management and staff and not with other parents in the center or via social media channels such as Facebook, X or personal blogs.

If any parent, guardian, or visitor fails to abide by the Code of Conduct the following procedure will be followed:

1. The concern and any inappropriate behavior will be documented and communicated to the Director.
2. The Director will set up a meeting with all parties involved to gather more information and determine if the Code of Conduct was violated.
3. The information will be used to reach a decision, and should it be determined that there was a violation of the Code of Conduct, the Director will consult with the Area Director.
4. If a breach of the Code of Conduct is verified, the Director and/or Area Director have the right to terminate care immediately.

Communication and Addressing Concerns: Open and clear lines of communication between Directors, Supervisors, staff, and parents/caregivers are essential to creating the type of environment we value at Busy Bees US. As such, we require parents to communicate with staff in an open, non-confrontational manner when expressing concerns about their child or the program. We expect that parents will voice their concerns in a professional and polite manner as soon as they arise. We also expect that parents will not get involved in other parents' concerns unless they directly involve them or their child.

Threats and Threatening Behavior: We have a responsibility to provide a safe environment for our personnel, the children we serve, and other adults. Therefore, we have a zero-tolerance policy regarding threats or threatening behavior in our Centers, whether the threat comes from a child or an adult, and regardless of who is the target of the threat. This includes, but is not limited to, threats to do physical harm to someone or threats to retaliate in any way. Violation of this policy may result in immediate withdrawal from the Center.

Appropriate Language: Parents/guardians and their guests must use appropriate language while on our property. Foul language of any kind is not permitted on Center grounds, which includes our parking lots and playgrounds.

Physical and Verbal Punishment of Children on Center Property: We do not allow parents/guardians to use any type of corporal punishment on any child, whether enrolled in our program or not, while on Center property. This includes parking lots, playground, and within the Center. Further, while verbal reprimands may be appropriate, it is not appropriate for a parent/guardian to verbally abuse their child while on our premises. Doing so can cause undue

embarrassment and emotional distress to a child. Violations of this policy may result in immediate withdrawal from our program. Parents/guardians are also prohibited from addressing or disciplining a child that is not their own. If you have a concern about the behavior of another child at our Center, please bring your concern to the Center Director who will address your concern and resolve it.

Professional Relationships: We ask our employees to maintain professional relationships at all times with families, even in their personal lives. Due to the professional conflict of interest created, Busy Bees US employees are:

- not permitted to communicate or socialize with parents/guardians through social media outlets, such as Facebook, Instagram and X.
- not permitted to solicit or accept offers of personal childcare services (babysitting, nanny services etc.) from parents of the center.

2.2 Arrival and Departure

Upon arrival and departure at the center, families are responsible for bringing their child(ren) to their designated classroom. No child will be dismissed without personal contact with a staff member. Families must make sure that a teacher is aware of the child's presence and departure before leaving the center.

2.3 Absences

If your child will not be attending on a scheduled day, please notify the center by 9:00 am. This will enable the center to maintain appropriate ratios and help the classroom educators effectively plan for the day.

If your child is ill, we request that you notify the Center Director not only of the absence, but also of the nature of the illness. This enables our staff to track illnesses which may occur at our school and also notify families in the case of a communicable illness. This information will be shared on a "need to know" basis and the Center will take all measures necessary to protect your child's confidentiality.

2.4 Toys and Electronic Devices from Home

Due to issues regarding sharing and distraction, along with the risk of damage or loss, toys and electronic devices from home (unless medically required) are not permitted to be brought into school unless specifically requested by the classroom teacher for use as part of the curriculum. Families are responsible for enforcing this policy with their child and are encouraged to consult the classroom teacher if their child is having difficulty with this policy. Electronic devices include but are not limited to walkie-talkies, cell phones, tablets, smart watches, gaming devices, etc.

2.5 Open Door Policy

Families are invited and encouraged to be involved in their child's center activities on an ongoing

basis. There are many ways in which families can participate at the center throughout the year, including reading in the classrooms, joining for special events, sharing traditions and talents, etc. Parents are also welcome to stop in at any time to observe your child or to visit.

2.6 Outdoor Play

Busy Bees US recognizes the importance of regular outdoor gross motor opportunities for children. With this in mind, we make every effort to provide children with daily experiences of outdoor play year-round. All children are provided outdoor time twice daily, weather and air quality permitting. Please provide appropriate outdoor clothing for your child daily.

2.7 Discipline and Positive Guidance Policy

Busy Bees US will provide a safe, secure environment for your child. Young children grow strong in all developmental areas when they trust the adults who care for them. Reasonable limits for safe, reliable, consistent patterns of behavior and realistic expectations of children are essential elements for positive discipline. Our staff believes children who are loved and appreciated are children who adjust to their surroundings with few discipline problems. Identifying and praising positive behavior, while redirecting the negative is both productive and successful. Each classroom environment will be responsive to the age and developmental needs and interests of the children. Room arrangement, materials, toys, and activities will be specifically selected to create an atmosphere of cooperation and support for each group.

Should particular problems or concerns arise regarding behavior in the classroom, the Center will contact parents for an individual conference. If parents have concerns, please call the Center to discuss solutions with your Center Director and educators.

2.7a Biting

Busy Bees US recognizes that biting is a developmentally appropriate behavior for children in infant/toddler classrooms. Families with children in these classrooms should expect that their child may be bitten or will bite another child. The staff understands that families are concerned and can be upset when their child is involved in a biting incident. We ask that you remember this is a developmentally appropriate behavior, and that the staff is working to identify situations which provoke or elicit this behavior so it can be prevented in the future. The staff will not punish or harshly discipline children for biting behavior; they will redirect the children to different activities in separate areas of the classroom. Families are expected to work with staff to identify methods and strategies to curb this behavior. Children older than 3 years of age may occasionally be involved in a biting incident as well, however it is not as common as in the infant and toddler classrooms.

Families will be notified by Incident Report that a biting incident occurred during the day. The staff may not discuss with either family the identity or medical history of the other child involved in the incident. This information is kept confidential and cannot be disclosed. Children may be

sent home for biting at the discretion of the Center Director.

2.7 b Dismissal

Busy Bees US reserves the right to dismiss any child at any time, with or without cause. While we make every effort to work with our families and support all of the children in our care, children may be dismissed for specific, consistent behaviors causing danger to themselves or others including but not limited to:

- Inappropriate actions (i.e., excessive biting, punching, kicking, abusive language, destruction of materials/equipment, flight risk)
- Inattention to safety rules, indoors and outdoors
- Excessive arguing and/or fighting

2.8 Nap/Rest Time

Infants nap each day according to their own schedules. Infants are placed on their backs to sleep in cribs. Infants may only use sleep sacks; no blankets or stuffed animals are permitted in cribs. Should other sleeping arrangements be required, we must have written permission from your child's doctor.

Toddlers and preschoolers take naps during the early afternoon. Children may bring a small blanket and stuffed animal for rest time. Please speak with your Center Director and your child's teacher if you have special requests regarding naptime.

2.9 Babysitting

A finder's fee of \$2,500 will be paid to Busy Bees US in the event you hire or employ a Busy Bees employee while they are employed at the Center, or within 60 days of their last day of employment at Busy Bees, for other than incidental babysitting.

Section 3: Health and Safety

3.1 Medical Records

All children must have a medical form completed by a licensed medical professional before admittance into our program. Immunization records must be completed and up to date. Medical forms must be updated per state requirements, or as additional immunizations are received.

Children's medical records will be kept on file in the center office. Families are responsible for furnishing updated records as required by local licensing and health code. If a child is out of compliance or does not have proper paperwork on file, the child will not be able to attend until proper documentation is received by the center.

3.2 Communicable Illnesses

If you have any doubts about your child's health, please keep your child home and contact a medical professional. We are a school for healthy children. A child who is not well does not benefit from our program and can adversely affect the health of the class. If your child becomes ill at school, we will contact you so that your child can be picked up.

List of symptoms of which we must ask you to keep your child at home:

- A temperature of 100.4 degrees or any fever accompanied by:
 - Cough with a deep breath
 - Earache or draining ear
 - Spasms of cough
 - Sore throat
- A rash of any kind until diagnosed, treated, or declared harmless by a physician
- Diarrhea and/or vomiting
- Conjunctivitis (pink eye)
- Bronchitis
- Strep throat
- Head lice
- If they are unable to participate in normal daily activities

A child will be sent home if any of the above symptoms are seen during the day. It is expected that if a child leaves the Center after 12:00 pm, he/she will remain home the full next day to ensure complete recovery. The center is not equipped to care for ill children. Each family must be prepared with a reliable emergency contact in the event the child becomes ill during the day and families cannot be reached.

Once a family has been notified, the child should be off the premises within one hour. If a family is reached, but cannot pickup their child within one hour, it becomes the family's responsibility to arrange for alternate pick up with someone listed on the child's emergency contact form. The staff will not continue to call those listed on the contact list once a family is reached. If a family cannot be reached, the staff will call those individuals listed on the emergency contact list until arrangements can be made for the child to be picked up.

Children are required to be excluded from the program for loose bowels or diarrhea which occurs 3 or more times in a 24-hour period. Children may return to the program when normal bowel movements resume.

A child will be allowed to return to the Center if he/she has been on medicine for a contagious illness for 24 hours or is fever free without the aid of a fever reducing medication.

If a child is well enough to attend care, he or she is presumed well enough to participate in all regularly scheduled outdoor activities.

If your child is exposed to any communicable disease at school, we will notify you as soon as possible. If your child is home with a communicable disease, please call the center and let us know so that we can send the appropriate notice to the other parents.

3.3 Nut Free Center

Due to the extreme nature of allergic reactions to peanuts, our centers do not serve any products that contain or may contain these nuts. We also require that when an alternative food choice is provided for your child, that it complies with this requirement.

3.4 Fire Drills and Emergency Evacuation

Centers conduct monthly fire and emergency evacuation drills. Families, staff, and children will not be made aware of the drill dates or times.

Our centers also conduct Shelter in Place and Lockdown drills throughout the year. Families will be made aware of the date and time of these drills via BP Connect.

In the event of a real fire or emergency in which the center must be evacuated, all children and staff members will be routed to a safe, off-site location. Please check with your Center Director for the designated location.

3.5 Firearms and Other Weapons

No firearm, weapon or facsimile of a firearm or weapon is permitted on any Busy Bees US premise at any time, except when carried by a peace officer as defined by individual state law.

3.6 Smoking Policy

For the health and safety of the children, families, and staff, smoking and vaping are prohibited in the Center and on the premises.

3.7 Child Abuse and Maltreatment

In the event of any concern regarding abuse, maltreatment, or neglect of a child in our care, it is our policy to follow the self-reporting protocol as established by our local Child Protective Services agency.

Section 4: Closed Circuit Television (CCTV) System Policy

Executive Summary

Our CCTV policy sets out expectations around placements of cameras, purpose, protection of privacy, security of video and access. CCTV is for internal use only and can be used in the case of potential serious injury and/or complaint, and for training and maintenance purposes.

Video recording is to be maintained for maximum 7 days.

Any requests to access videos must be communicated to the Director of Operations and the Director of Safety and Compliance. Individuals requesting access outside of the approved list indicated in the policy must submit their request in writing to the Centre Director and this must be approved by the Director of Operations and Director of Safety and Compliance. Access to video requested by licensing authorities, child protection agencies and law enforcement does not require approval, but the communication protocol outlined above must be followed.

Purpose

Select Busy Bees North America (BBNA) centres operate a Closed-Circuit Television System which makes video and potential audio recordings. BBNA values the confidentiality and privacy of its staff and the families that we serve, and therefore provides this CCTV policy (this Policy) to outline the purposes and uses of these CCTV devices and recordings.

As a provider of early learning and child care services, from infant to pre-kindergarten and older children on a before and after school basis, BBNA is responsible for the most vulnerable population and, therefore, maintains the highest standards in care and safety to provide exceptional early years services.

The CCTV system will be used for the purposes of reviewing room activity, staff and child interactions and behaviour where there is suspicion or allegation of a significant incident, when there has been a complaint or concern voiced by parent, guardian or staff member, or as otherwise provided in this policy.

The use of CCTV is not intended to replace appropriate management practices and procedures in supervising and coaching staff.

Security and Protection of Privacy

The video / audio-video recorder will be kept secure in either its own locked cabinet or a locked room which has restricted access. BBNA implements security safeguards to protect the CCTV equipment and recordings at the level appropriate to the sensitivity of the information. Access to the system's controls and reception equipment, and to the recordings it captures, will be limited to authorized persons.

Recordings will be securely held, and access within the organization limited to the purposes described in this Policy. Cameras should be positioned as best they reasonably can to reduce the likelihood of capturing individuals not intended to be filmed, while achieving the objectives of this policy.

Authorized persons will only access the recordings in the case of a complaint, incident or allegation of a significant incident, for supporting training, or for reasonable maintenance, installation, or configuration of the CCTV systems.

Authorized persons include the following who will be provided access strictly on the basis of need-to-know:

- Centre Director (CD)
- Area Director (AD)
- Director of Operations (DO)
- Chief Education Officer (CedO)
- Chief Operating Officer (COO)
- Facilities Directors (outside areas)
- Chief Human Resources Officer; (CHRO)
- Director of Safety and Compliance (DSC)
- Chief Executive Officer (CEO) and
- others as allowed by the COO or CEO
- Health and Safety Team
- Education team (onsite access)

Location

The following areas may be covered by CCTV:

- Classrooms
- Sleep Rooms
- Gymnasiums
- Multi-purpose rooms
- Hallways
- Reception area
- Front door
- Outside play areas
- Parking lots
- Director's office
- Kitchen
- Any other area where coverage is appropriate, except for those locations listed below as not covered.

The following areas will not be covered by CCTV:

- Children's toilet area
- Staff room
- Adult bathrooms.

The CD shall be responsible for reviewing camera locations from time to time and for considering requests from staff, parents, guardians or other persons regarding concerns relating to privacy or confidentiality due to the location of a particular CCTV camera. Cameras should be positioned as best they can to reduce the likelihood of capturing individuals not intended to be filmed. CD will monitor to ensure that room décor or other objects do not interfere with the view of the camera.

BBNA will endeavor to post reasonably visible notices of the CCTV recording as appropriate and near CCTV equipment but may not feasibly post notices in every location where video or audio-video recording is in progress.

Access

Access to the system is restricted to the authorized persons and to the existence of suspicion or allegation of a significant incident or complaint, for supporting training regarding program delivery, or maintenance, installation or configuration of such systems. Audit trails monitor this access to ensure compliance. In accordance with this Policy, recordings may be shared with a third-party service provider for the sole purpose of obscuring or pixelating personal information about individuals prior to use or disclosure of a recording.

Individual Right of Access

Individuals may request access to their personal information, or the personal information of their child, which has been recorded through the CCTV System. An access request must be made in writing to the Centre Director. All access requests must be approved by the Director of Operations and the Director of Safety and Compliance. The Centre Director will share the written parent request with the DO and DSC. Access will be provided within thirty days to any retained and redacted recordings, provided such access would not reveal personal information about another person or otherwise be prohibited by law. However, if the information about the other person is severable from the record, by being obscured or pixelated through commercially reasonable means, or if the other person consents, access will be provided to the requester. This is to protect other children and staff that may be present on the recording. If the recording requested does not relate to the individual making the request, or their child, access will not be provided.

If we cannot give access to a recording of the requestor or their child, we will provide reasons, as allowed by law.

Access Requests in the Case of Serious Incidents or Complaints

If a serious incident or complaint has been received and an access request is made by a parent or guardian of an affected child or an affected staff member, access will be granted in accordance with applicable law. Where required by law, staff concerned will be informed, with reasonable notification, of the footage being viewed in this way and of the purposes of the viewing and will be given an opportunity to view the same footage in the same or similar manner.

BBNA will only release a copy of any recording as required by law or in response to a valid government or law enforcement subpoena, warrant or request. These requests do not need approval but the Director must inform the Director of Operations and Director of Safety and Compliance what has been requested and shared copies of recordings will only be released to third parties on the express authority of the COO or CEO and upon demonstration, by the government or law enforcement agency, of its lawful authority to access it. BBNA will make reasonable efforts to maintain the confidentiality of the recordings, including but not limited to such requirements under data protection legislation or other law or statute.

When the recording is reviewed due to suspicion or allegation of a significant incident, or when there has been a complaint or concern voiced by parent, guardian or staff member, the CD or other authorized person will document the following as applicable:

- the date and time at which the recording was reviewed
- the date on which disclosure was made
- the identification of any third party who was allowed access or to whom disclosure was made
- the reason for allowing access or disclosure and the extent of the information to which access was allowed or which was disclosed and
- the identity of the person authorizing such access.

As indicated above, where the recordings contain images of individuals other than the subject(s), the recording will be altered to disguise or blur those images of other individuals so that they are not readily identifiable. If the CCTV recording system does not have the facilities to carry out that editing, an appropriate competent third party may be hired to carry it out, at the discretion of the COO or CEO. If such an editing company is hired, BBNA will ensure that there is an agreement in place with the editing company to protect confidentiality and to ensure compliance with this Policy and data protection legislation in relation to the recordings.

Role of the CD

The CD's role in maintaining an effective and secure CCTV environment is critical. They are responsible to:

- ensure the system is always operational and to immediately advise IT support of any system failure / outages
- ensure that all servicing and repair needs are communicated to IT support and followed through on
- ensure that the view of the camera is not obscured by objects in the classroom
- forward any individual's written request for access to a recording that exists to the DSC
- maintain a record of the release of any recordings
- ensure secure retention and destruction of recordings as appropriate
- ensure signage is in place that will make individuals aware that they are entering a CCTV area
- ensure confidentiality is maintained at all times. Any relevant recordings must be stored in a locked secure cabinet or a locked, secure room and will only be available to those directly connected with achieving the objectives of the system. Any copies must be stored in a locked secure cabinet or a locked, secure room until delivered to an appropriate authority, and when returned by them if applicable.

Fairness

BBNA respects and supports every individual's entitlement to go about his / her normal duties. Use of CCTV as outlined in this Policy will be conducted in a professional, ethical, and legal manner and any diversion of the use or processing of CCTV for other purposes is prohibited under this Policy. CCTV will be limited to uses that do not violate a person's reasonable expectation of privacy. The CD will be responsible for ensuring that parents and guardians are informed, when they enroll their child, of the purpose of the CCTV and how it can and cannot be used. A copy of this Policy will be provided and will be available at the centre at all times.

Footage recorded on the CCTV system and viewed under the terms of this Policy may be used to assist in establishing the facts regarding a serious incident, or an allegation thereof, or a complaint. Doing so may give rise to an investigative meeting with any relevant members of staff and may result in disciplinary proceedings. Any violations of this Policy by BBNA staff may lead to disciplinary action, including without limitation termination of employment.

CCTV Data Retention and Destruction

CCTV data will remain on the hard drive of the system for up to seven calendar days. At the end of seven calendar days, if no incident is suspected or no complaint has arisen, data will be recorded over. No copies are made in the normal course of operations. Recordings will be retained for longer than seven days in the event that the investigation of a serious incident or complaint is in process, or if BBNA is under a legal obligation to retain the recordings. The ability to export video recording is limited to the Area Director, Director of Operations, Safety and Compliance. Once the investigation concludes and/or the data retention is no longer required under law, the recording will be securely destroyed or recorded over.

Any relevant recordings downloaded or copied shall be stored in a locked secure cabinet or a locked secure room and will only be available to those directly connected with achieving the objectives of the system. Data is retained for up to seven calendar days in consideration of the time that could pass between an incident occurring, the knowledge that an incident occurred, and the complaint or request being received by BBNA.

Biometric Information

CCTV video and audio recordings will capture and store certain personal and biometric data for individuals who are recorded. Additionally, artificial intelligence tools may be used by BBNA to identify certain individuals, including without limitation the use of facial recognition technology. This technology is used to enable tracking and viewing of one individual across multiple cameras, to accomplish the purposes outlined in this Policy.

CCTV recordings, including any biometric or personal data collected through the recordings, will not be shared with any third parties except as elsewhere provided in this Policy.

Location of Data Storage

Recordings through the CCTV systems are stored in the country where the BBNA Centre operates.

By reviewing, agreeing to and signing the Video the CCTV Acknowledgement you consent to the collection, processing, and storage of personal and biometric information as outlined in this Policy.

You can withdraw consent by contacting the Centre Director. If and when you withdraw consent, BBNA will not be in a position to provide you access to its premises.

If you have any questions or requests related to this Policy, please contact the Director of Safety and Compliance at safety@busybeesna.com.