CCTV & Audio Recording Policy

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1. Purpose

The nursery is registered with the Information Commissioner's Office (ICO) and operates its CCTV system in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant ICO guidance.

This policy explains how CCTV is used, accessed, stored and managed within the nursery.

The nursery uses CCTV to:

- Promote the safety and welfare of children, staff and visitors.
- Protect the nursery premises, equipment and property.
- Support safeguarding, investigations and incident management.
- Support staff development, supervision, training and the review of practice.
- Promote best practice and the safe operation of the nursery.

Lawful Basis

The nursery processes CCTV footage where this is necessary for its legitimate interests, including safeguarding children, maintaining the safety and security of the premises, investigating incidents and complaints, supporting staff development and supporting the safe and effective operation of the nursery.

The nursery will ensure that its use of CCTV is necessary and proportionate and that the rights and interests of children, staff, families and visitors are appropriately considered.

The nursery maintains a Data Protection Impact Assessment (DPIA) covering the operation and use of its CCTV system. This will be reviewed where there is a significant change to the CCTV system, camera locations, recording capabilities or the purposes for which footage is used.

2. Scope

The CCTV system comprises **16 fixed cameras** located inside and outside the nursery.

Cameras are located in the following areas:

- Reception
- Sleep Room – Camera 1

- Sleep Room – Camera 2
- Bunnies Room
- Teddies Room
- 1st Floor Landing
- Red Bears Room
- Green Bears Room – Front
- Green Bears Room – Rear
- Yellow Bears Room – Front
- Yellow Bears Room – Rear
- Blue Bears Room
- Main Garden – Left
- Main Garden – Right
- Side Garden
- Main entrance
- Cameras are not installed in toilets, changing areas or staff rooms.

Audio Recording

Audio recording is enabled on cameras located within the main rooms

Audio recording is **not enabled** in:

- Sleep rooms.
- Reception.
- The 1st Floor Landing.
- Gardens or other shared/circulation areas.
- The use of audio recording will be kept under review and will only be used where the nursery has determined that it is necessary and proportionate for the stated purposes of the CCTV system.
- Clear signage is displayed at the entrance to the nursery and throughout the premises to inform children, families, staff and visitors that CCTV is in operation. Where audio recording is in use, this will also be made clear.

3. Use of CCTV

Authorised members of the leadership team may view live or recorded CCTV where necessary to:

- Support safeguarding and child protection.
- Investigate incidents, accidents or complaints.
- Support staff development, supervision, training and the review of practice.
- Identify and promote best practice.
- Support the safe operation of the nursery.
- Support building and premises security.

Staff Practice and Development

CCTV may be reviewed by authorised members of the leadership team to support staff supervision, training and development, safeguarding and the promotion of good practice.

This may include reviewing staff interactions with children and how aspects of their role are carried out, in order to recognise good practice and identify where further support, guidance or training may be beneficial.

CCTV will not be used for continuous monitoring of individual employees or for the purpose of routinely scrutinising their day-to-day performance.

This does not prevent footage from being reviewed without prior notification where necessary in connection with a safeguarding concern, complaint, incident or disciplinary investigation.

4. Access

Access to live or recorded CCTV is limited to authorised personnel and only where there is a legitimate safeguarding, operational, staff development or legal reason.

CCTV can only be accessed on a company laptop whilst on the nursery premises. CCTV will not be accessed remotely or through personal laptops, mobile phones, tablets or other personal devices.

- All authorised personnel with access to CCTV will be made aware of the procedures that must be followed when accessing footage and their responsibilities under data protection legislation and relevant CCTV guidance.

- All employees will be made aware of the restrictions relating to the access, use and disclosure of CCTV footage.

Authorised Roles

The following roles are authorised to access CCTV:

Nursery Manager/Deputy Manager

The Nursery Manager/Deputy may access CCTV:

- To support safeguarding.
- To investigate incidents, accidents and complaints.
- To support staff development, supervision, training and the review of practice.
- To identify and promote best practice.
- To support the safe operation of the nursery.

Designated Safeguarding Lead (DSL)

- The DSL may review footage where necessary to support safeguarding concerns, investigations or referrals

IT or Facilities Staff

- IT or Facilities staff may access the CCTV system where necessary to install, maintain, repair or resolve technical issues relating to the system.

CCTV Access Log

Any access to recorded CCTV footage will be documented in the CCTV Access Log.

The log will record:

- The date and time the footage was accessed.
- The name and role of the person accessing the footage.
- The date, approximate time and camera/location of the footage viewed.
- The reason and purpose for accessing the footage.
- Whether the footage was viewed only or downloaded/exported.
- Where applicable, the reason for any download or disclosure.
- Where downloaded footage has been securely stored.

- The date downloaded footage is deleted when it is no longer required.

5. Retention

CCTV recordings are stored securely and access is restricted to authorised personnel.

Standard CCTV and audio recordings are retained for a maximum of **30 days** before being automatically overwritten or deleted.

Footage may be retained for longer where it is required in connection with:

- A safeguarding concern.
- An accident or incident investigation.
- A complaint.
- A disciplinary or employment investigation.
- Legal proceedings.
- A request from the police, local authority or another authorised body.
- Another lawful and legitimate purpose.

Where footage is retained beyond the standard retention period, it will only be kept for as long as reasonably necessary for the purpose for which it has been retained.

A record will be kept of occasions when recorded footage is accessed, downloaded or disclosed.

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6. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage containing their personal information, subject to the requirements and exemptions contained within data protection legislation.

Requests should include sufficient information to enable the nursery to identify the relevant footage, such as:

- The date.
- Approximate time.

- Location/camera.
- Any other information that may assist in identifying the footage.

The nursery will normally respond to a valid Subject Access Request within **one calendar month**, in accordance with data protection legislation.

Where footage includes other identifiable individuals, the nursery will consider their privacy and data protection rights before disclosure.

Where appropriate and reasonably possible, steps such as redaction, blurring or providing an alternative form of access may be considered.

7. Subject Access Requests by Parents

Parents or carers with parental responsibility may request CCTV footage containing personal information relating to their child.

Before disclosing footage, the Nursery Manager, Owner or Designated Safeguarding Lead will consider:

- The child's rights and best interests.
- Any safeguarding implications.
- The privacy and data protection rights of other children, staff or visitors shown or heard in the footage.
- Whether any relevant legal exemptions apply.
- Whether the footage can reasonably be redacted or otherwise provided without adversely affecting the rights of others.

A request does not automatically mean that the original or unedited footage will be provided.

Where footage includes other identifiable individuals, appropriate steps will be taken to protect their privacy where reasonably possible before footage is disclosed.

8. Disclosure

CCTV footage will not be disclosed to third parties unless there is a lawful and legitimate reason to do so.

Where appropriate, footage may be disclosed to organisations or individuals including:

- The police.
- Ofsted
- Local authorities or safeguarding partners.

Any disclosure of recorded footage will be documented, including who the footage was disclosed to, the reason for disclosure and the date of disclosure.

9. Complaints

Any concerns or complaints regarding the nursery's use of CCTV should be raised with the Nursery Manager in the first instance.

Where a concern cannot be resolved internally, individuals may have the right to raise their concern with the Information Commissioner's Office (ICO).

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10. Responsibilities

The Nursery Manager, or Deputy Manager in their absence, is responsible for ensuring that:

- CCTV is used in accordance with this policy and relevant data protection legislation.
- Access to CCTV is restricted to authorised personnel.
- CCTV recordings are stored securely.
- Standard recordings are retained for no longer than the nursery's stated retention period unless there is a legitimate reason to retain footage for longer.
- The CCTV Access Log is completed whenever recorded footage is accessed.
- Downloads and disclosures of footage are appropriately recorded and managed.
- Camera locations, fields of view and recording functions remain appropriate, necessary and proportionate.

- Cameras do not unnecessarily capture areas beyond those required for the stated purposes.
- The privacy of children, staff, families, visitors and neighbours is appropriately considered.
- The use of audio recording remains necessary and proportionate.
- Appropriate action is taken where safeguarding concerns arise, including making referrals where necessary.
- CCTV is used proportionately for safeguarding, security, investigations, staff development and the safe operation of the nursery.
- CCTV is not used to routinely or continuously observe individual employees without a specific and legitimate reason.
- Retained incident footage is securely deleted when it is no longer required.

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11. Policy Review

- This policy will be reviewed annually, or sooner where there are changes to legislation, ICO guidance, the CCTV system, camera locations, audio recording arrangements or nursery practice.

Appendix A. Retention & Deletion Schedule

Data	Retention	Deletion
CCTV + Audio (standard)	Maximum 30 days	Automatically overwritten/deleted by the

		NVR or associated CCTV system
Incident footage	Until the matter is concluded and the footage is no longer reasonably required	Securely deleted manually

Where footage is retained beyond the standard retention period, the reason for retaining it will be recorded and it will be securely deleted when it is no longer required.

Appendix B. How footage Is accessed

CCTV Camera footage:

All CCTV cameras are connected to the nursery's CCTV recording system.

CCTV footage and, where enabled, audio recordings can be accessed securely through the associated CCTV application or software using authorised login credentials.

The associated CCTV application or software will only be accessed by authorised personnel using a company laptop whilst on the nursery premises.

CCTV will not be accessed remotely or through personal laptops, mobile phones, tablets or other personal devices.

Access to recorded footage must be documented in the **CCTV Access Log** in accordance with Section 4 of this policy.

Incident Footage

Where CCTV footage needs to be retained in connection with an incident, safeguarding concern, complaint, investigation or other legitimate purpose, it should be downloaded and stored securely in the designated area of the nursery's shared drive.

The folder should be named using the following format:

S:\CCTV_Recordings\Nursery_Camera_DateCaptured\content

An accompanying record should be created explaining:

- The footage retained.
- The date and time of the footage.
- The camera/location.
- The reason for retaining it.
- Who downloaded or retained the footage.
- Where it has been stored.
- Any subsequent disclosure of the footage.

Retained footage will only be accessible to authorised personnel.

The footage will be securely deleted when the incident, concern, complaint or investigation has concluded and there is no longer a lawful or operational reason to retain it.

Version History

Version	Date	Description
00	04-01-2026	Initial Version