

Little Bears Daycare – CCTV Policy (8.3)



Policy statement

At Little Bears, We maintain the highest possible security of our premises to ensure that each child is safely cared for during their time with us.

The nursery CCTV surveillance is intended for the purposes of:

- promoting the health and safety and safeguarding of children, staff and visitors
- protecting the nursery building and resources.

The nursery operates a CCTV system, including fixed video and audio-enabled cameras positioned throughout internal and external areas of the premises. Cameras are **never** installed in toilets to protect the dignity and privacy of children.

The use of CCTV is considered **necessary and proportionate** by nursery management to support our core responsibilities: safeguarding children, maintaining a secure environment, and ensuring the safety of staff and visitors. The system helps us deter and detect unauthorised access, damage to property, theft, and anti-social behaviour. Where appropriate, CCTV footage may also be reviewed as part of internal investigations, including grievance, disciplinary, or capability procedures.

We process CCTV video and audio under the lawful basis of **Legitimate Interests (Article 6(1)(f) UK GDPR)**. Our legitimate interest is the protection of children, the prevention of harm, and the ability to review incidents accurately. Audio recording is used **only** when it is necessary and proportionate for safeguarding purposes. It is **not** used for staff performance monitoring or for general surveillance of conversations.

This policy outlines how we use, store, and protect CCTV footage to ensure compliance with data protection legislation and to uphold the rights and privacy of all individuals on our premises.

Monitoring

The CCTV system within the nursery premises records images for the purposes of safety, security and safeguarding. Access to CCTV footage is strictly controlled and limited to authorised personnel via a secure, password-protected system. CCTV is not routinely monitored. Access to live or recorded footage is only undertaken where necessary for safety,

Little Bears Daycare – CCTV Policy (8.3)

safeguarding, security, training or investigative purposes. The system is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and UK GDPR. This policy outlines the nursery's use of CCTV and how it complies with the Act. The nursery adheres to the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that surveillance is used lawfully, proportionately, and responsibly at all times. The nursery management are the only authorised members of staff with access to images – a list of authorised operators are set out in the below Schedule – CCTV Location and Access. They are aware of the procedures that need to be followed when accessing the recorded images and understand their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images. A copy of this CCTV Policy will be provided on request to staff, parents and visitors to the nursery and is available on the website. The CCTV is only monitored in response to a specific incident, concern or training need and is otherwise not monitored or accessed.

Location of cameras

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. Adequate signage will also be prominently displayed at the entrance to the nursery's property. The location of CCTV coverage is set out below in the Schedule – CCTV Location and Access.

Storage and retention

The images captured by the CCTV system will be retained for a maximum of 21 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 with a log of access kept. Access will be restricted to authorised persons only. Supervising the access and maintenance of the CCTV System is the responsibility of the registered person. In certain circumstances, the recordings may also be viewed by other individuals. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. Files will be stored in a secure environment with a log of access to recordings kept. Recorded footage and the monitoring equipment will be securely stored in a restricted and password protected area. Unauthorised access to that area will not be permitted at any time. A log of access to footage will be maintained. When any other individual is accessing images an authorised member of staff must be present. A written record of access will be made. 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.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act / GDPR. 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. The nursery will respond to requests within 21 of receiving the request or sooner. The nursery 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

Little Bears Daycare – CCTV Policy (8.3)

made. Where footage contains images relating to third parties, the nursery will take appropriate steps to mask and protect the identities of those individuals. In exceptional circumstances we may show footage to parents or carers regarding an accident or incident concerning their own child that incidentally contains images of other children or adults, this will be under strict supervision by the nursery manager and at the nursery premises only.

Complaints

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

Responsibilities

The nursery management will ensure:

- That the use of CCTV systems is implemented in accordance with this policy
- They oversee and co-ordinate the use of CCTV monitoring for safety and security purposes
- That all CCTV monitoring systems will be evaluated for compliance with this policy
- That the CCTV monitoring is consistent with the highest standards and protections
- They review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- They maintain a record of access (e.g. an access log) to or the release of files or any material recorded or stored in the system
- That the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- That all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals
- 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”
- That monitoring footage are stored in a secure place with access by authorised personnel only
- That images recorded are stored for a period not longer than 21 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil)
- That camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- That under certain circumstances, the CCTV footage may be used for training purposes where this necessary and proportionate. Any such use will be carefully controlled and personal data minimised where possible.
- That in limited and appropriate circumstances, CCTV footage may be viewed by parents/carers onsite under supervision by an authorised member of staff where it relates directly to an incident involving their child. Viewing will be carefully managed to protect the privacy and confidentiality of other children, staff, and individuals and CCTV footage will not be

Little Bears Daycare – CCTV Policy (8.3)

copied, shared or sent to parents/carers unless in exceptional circumstances where it contains only their own child and its disclosure is deemed appropriate and proportionate.

Data Protection Impact Assessment (DPIA)

A DPIA has been completed due to the high-risk nature of recording children and capturing audio. It includes:

- Assessment of risks (e.g., private conversations, sensitive disclosures)
- Justification for audio recording
- Technical and organisational measures to reduce risk
- Consultation with staff

A summary can be provided upon request.

This Policy Was Adopted By	Little Bears Daycare
Last Updated	22 July 2026
Signed on Behalf of Provider	Signed by:  22 July 2026
Name of Signatory	Laura Leath
Role of Signatory	Chairperson of Little Bears Daycare

SCHEDULE- CCTV LOCATION AND ACCESS

Nursery	Little Bears Daycare
Location	Main entrance, hallways, Panda room, Koala room, Bear Cubs, Sleep room, Outdoor gardens, carpark.
Authorised Operators	Aimee Bailey, Beth Williams, Sally Hale