

Little Dukes: Reflections CCTV Policy Sept 2025 V1

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Little Dukes: CCTV Policy

Reflections Nursery and Forest School

Monitoring and review...

This policy will be continuously monitored, refined and audited by the Nursery Manager and Leadership team, who will also review it annually to assess how efficiently duties have been carried out over the year. This review will take place no later than one year from the date shown below, or sooner if needed due to changes in legislation, regulatory requirements, or best practice guidelines.

Current version adopted: September 2025

Reviewed by:

Joanne Allen – Principal, Reflections Nursery and Forest School
Rachel Martini – Senior Head Teacher, Reflections Nursery and Forest School
Becca Bakter – Head Teacher, Reflections Nursery and Forest School
Geoff Marston, Group Compliance Director - Dukes Education
Nazish Usman, Head of Safeguarding and Compliance – EYFS

Next review due: August 2026

Any reference to 'Little Dukes' applies to the nursery named above.

Little Dukes: CCTV Policy

Policy overview:

At Little Dukes, we believe that children flourish best when in a safe and secure environment. Our CCTV Policy details how we use video recordings to ensure the safety of the nursery and the children in our care.

The nursery will operate its CCTV system under statutory guidance issued under the Data Protection Act (DPA) 2018 and any new legislative changes under the Data Use and Access Act (2025).

CCTV (Closed Circuit Television) surveillance is intended for the purposes of:

- Promoting the welfare, health and safety of children, staff, and visitors
- Protecting the nursery building and resources
- Developing best practice

Please note: CCTV includes video doorbells, webcams, and wearable recording devices where appropriate.

Whilst it is not our policy to have CCTV in all of our settings, some locations are securely monitored by a CCTV surveillance system. The Nursery Manager and Principal is responsible for the operation of the system for ensuring compliance with this policy.

This policy outlines our use of CCTV and how it complies with the DPA.

All authorised operators and employees with access to images and recordings are aware of the procedures to be followed when accessing the system. All operators are trained to 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 will be made available on the 'Family' parent app.

Aims:

We recognise that the use of CCTV has become a common feature of our daily lives and, while its use is generally accepted, CCTV operators have certain duties and responsibilities to those whose images are caught on camera.

The Nursery complies with the Information Commissioners office CCTV Code of Practice and any new guidance issued by the Information Commission to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

The use of CCTV and the associated images is covered by the Data Protection Act

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Little Dukes: CCTV Policy

2018 and GDPR. This policy outlines the Nursery's use of CCTV and how it complies with the Act and is associated with the Nursery's Data Protection policy, the provisions of which should always be adhered to.

The CCTV system comprises of position cameras, a monitor, digital hard drive recorder and a public information sign detailing the named operator and contact details. No camera is hidden from view, and all will be focused on circulation areas ensuring no coverage of private accommodation such as toilets and nappy changing areas.

Signs are prominently placed at the entrance and exit points of the site to inform staff, children, parents, and visitor that a CCTV installation is in use. However, when an incident does occur every effort will be made to secure and download the footage in case it is requested by an authorised third party such as the police or social care.

The use of CCTV to control the perimeter of the nursery for security purposes has been deemed to be justified by the nursery management. The system is intended to capture images of intruders or of individuals damaging property, removing goods without authorisation, or incidents of antisocial behaviour.

Purpose of the System

The system has been installed by the Nursery with the primary purpose of:

- Monitoring staff interactions with children.
- Monitoring visitors to the nursery including contractors.
- Ensuring that children are properly cared for and safeguarded.
- Facilitating the identification of any activities / events which might warrant disciplinary proceedings being taken against staff and assist in providing evidence to the nursery manager.
- Reducing the threat of a child being abducted
- Monitoring damage to the building
- Monitoring Theft
- Assisting in the prevention and detection of crime
- Ensuring the safety of all the users, staff, children, parents, and visitors, consistent with the respect for the individual's privacy.

The CCTV system is monitored centrally from the nursery office and is registered with the Information Commissioner's Office (ICO) (now the Information Commission) under the terms of the Data Protection Act 2018.

- Deterring those having criminal intent.
- Providing information in the event of a child going missing from the premises.
- Providing information for any other incident or request where visual evidence is relevant and falls within the legal requirements

Monitoring:

The headteacher is the named individual responsible for the operation of the system and the correct use of data and will be shown as such on the relevant signage in line with the Information Commission guidance.

Although staff are well-positioned around the rooms, sometimes, things can get missed, this could be because the staff are dealing with another situation or engaged in an activity or conversation with another child.

The CCTV can also be used to assist staff if something may have been missed, e.g., accident or injury or even details for an observation. This allows any information that may need to be handed over to parents/carers and/or other professionals with as much accuracy as possible.

The system **will not** be used to provide images for the internet or record any sound.

CCTV will be reviewed by the head teacher following any reported incidents or accidents that require clarification of the cause, in the case of unexplained marks or bruises, or in the case of allegations of harm or inappropriate behaviour by a member of staff.

It is the headteacher's responsibility to capture any CCTV footage from any incident which may be required as evidence / requested from an external third party such as the police and / or social care.

Head teachers as part of their ongoing monitoring of practice in rooms may also review CCTV to observe moments during the day for which they were not present to assess ongoing quality of practice and behaviour in a room. This to be performed at Head teachers' discretion on an ad hoc basis. CCTV spot check logged will be completed every two weeks.

The Headteacher and Principal shall ensure:

- That through regular review, the CCTV system is functioning as it should, is in good repair and where it is not, they have reported the fault and arranged for repair.
- That the use of CCTV systems is implemented in accordance with this

policy, and 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.
- That if safeguarding concerns arise from monitoring the footage, appropriate safeguarding actions are taken, e.g. contacting the Local Authority Designated Officer (LADO). Please use the Safeguarding Policy in conjunction with the CCTV Policy for procedures in the event of a staff allegation.
- 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 to any external authorised third party.
- 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 external 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 (including staff supervision, staff training etc.).

After an incident requiring review of CCTV footage

- If any incident or allegation is of a safeguarding nature, the nursery's safeguarding procedures must be followed and advice obtained from the LADO.
- The head teacher will ensure that any footage requiring review after an incident will be downloaded as soon as possible from the CCTV system hard drive. This electronic video footage / archive footage will be securely stored separately in the nurseries individual setting centralized IT file system in case it is required as evidence to any incident which may have occurred.
- After any incident, the principal will be informed immediately that CCTV footage has been captured and stored securely with access by authorised personnel only.
- Those images recorded will be stored for a period of no longer than 30 days and are then erased unless required as part of a criminal investigation or court proceeding.

Location of cameras: [Appendix 1](#)

The location of CCTV cameras will be indicated, and adequate signage 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.

Signage shall include the name and contact details of the data controller as well as the specific purpose(s) of the CCTV 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 or prosecution of that issue.

On no account should any footage required as evidence remain on the CCTV hard drive system.

Supervising the access and maintenance of the CCTV system is the responsibility of the Head Teacher. In certain circumstances, the recordings may also be viewed by other individuals such as Principal as nominated individual. Monitoring equipment will be securely stored in a restricted area.

Access to Recordings (DSL and DDSL)

Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel.

When accessing images, two authorised members of staff (DSL / DDSL) must be present, and a written record of access will be made.

Subject Access Requests (SAR): [Appendix 2](#)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 2018 and 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 28 calendar days of receiving the request.

The nursery has a right to extend the time limit to respond for another 2 months from the initial 28 day deadline if such a request is complex. The person requesting such information will be informed of the reason for this.

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 require it will be made.

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

Complaints:

Complaints and enquiries about the operation of CCTV within the nursery should be directed to the Head Teacher in the first instance. Details of our Complaints Policy can be found on the nursery website and through the 'Family' parent app.



Appendix 1 Camera locations:

Please identify below, the locations of all internal and external cameras within the control of the named nursery. Please include all fixed devices with the capability of recording CCTV images, including video doorbells:

[illegible]

Appendix 2: Subject Access Request (SAR) Form

Person requesting footage:

Name:	
Contact number:	
Email address:	
Address:	
Name of nursery:	
Relation to the nursery:	
Date/time of footage required:	
Reason(s) for request:	
Date required by:	

Below for completion by nursery:

Name of nursery:	
Date of footage:	
Start time of footage:	
End time of footage:	
Camera(s) footage captured on:	
Current time on recorder:	
Current time on Speaking Clock:	
Serial number of copied media disk:	

Person issuing the above footage:

Name:	
Job title:	
Signature:	
Date:	

Person witnessing footage being provided:

Name:	
Job title:	
Signature:	