

CCTV and Audio Surveillance Policy

1. Policy Statement

Little Learners Nursery and Pre-School use Closed Circuit Television (CCTV) systems, including limited audio recording capability, as part of our safeguarding, security and health & safety arrangements. The primary purpose of CCTV is to promote the safety and wellbeing of children, staff, parents and visitors, and to support the investigation of incidents, accidents, complaints or safeguarding concerns. CCTV is not used as a replacement for appropriate staff deployment, supervision or required staff-to-child ratios.

2. Purpose of CCTV Use

CCTV is used to:

- Safeguard children and support child protection practice
- Assist in the investigation of incidents, accidents or allegations
- Promote a safe environment for children, staff and visitors
- Protect staff from false allegations
- Support health and safety monitoring and security of premises

3. Camera Locations

Cameras are installed in the following areas:

- Children's base rooms
- Shared play spaces and halls
- Corridors and access routes
- Nursery offices
- Kitchen and food preparation areas
- Entrances, exits and external areas

Cameras will **not** be installed in:

- Toilets or bathroom areas
- Nappy changing areas
- Staff rooms
- Designated confidential meeting rooms

4. Audio Recording

The cameras have audio recording capability. Audio recording is considered more intrusive than visual recording and will only be used where necessary and proportionate for safeguarding and investigative purposes.

Audio recordings will not be used for routine staff performance monitoring.

Access to audio recordings is restricted to authorised senior management and will only be reviewed where there is a clear safeguarding, disciplinary or legal rationale.

5. Data Protection and Lawful Basis

All CCTV recordings are processed in accordance with the UK General Data Protection Regulation and Data Protection Act 2018.

The lawful basis for processing CCTV images and audio recordings is:

- Legitimate interests in ensuring safety and security



A Data Protection Impact Assessment (DPIA) has been completed to assess risks and ensure surveillance is proportionate.

6. Monitoring and Access

- Live monitoring may take place within the nursery office
- Access to recordings is limited to authorised senior staff
- Any viewing or download of footage must be documented
- External agencies may be provided access where required by law e.g. for safeguarding purposes if it is **necessary and proportionate** to prevent or investigate harm or to the Police to report crime or serious incidents.

7. Retention of Recordings

CCTV recordings are normally retained for 30 days.

Recordings relating to safeguarding incidents or investigations may be retained for longer in line with legal or regulatory requirements.

8. Transparency

Clear signage is displayed throughout the nursery.

Parents and staff are informed through privacy notices and policy acknowledgement procedures.

9. Subject Access Requests

Disclosure of recorded CCTV material will only be made available to third parties in strict accordance with the purposes of the system and is limited to the following:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder.
- Prosecution agencies.
- Emergency services in connection with the investigation of an accident.
- Individuals who make a subject access request.

9.1 How to make a subject access request

Individuals have the right to access their personal data. This is known as a subject access request.

9.2 Subject access request procedure

- a) Requests to access CCTV data must be made as soon as possible because CCTV images are only retained for 30 days.
- b) Requests to access CCTV data may be made verbally or in writing to the Nursery Manager.
- c) The Nursery Manager will arrange for images to be viewed within one month of the request.
- d) The Nursery Manager has the right to refuse a request for a copy of the data, particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- e) If we cannot comply with an access request, we will fully document the reasons and inform the individual making the request.

Full details of subject access requests can be found in LifeLine's General Data Protection Regulation policy.

This policy meets the requirements of the Early Years Foundation Stage Statutory Framework effective from 1st September 2026.

Review

This policy will be reviewed annually or following any significant safeguarding or data protection changes.

Date policy last reviewed/updated	28 th July 2026	Reviewed by	Terri Noone – Regional Nursery Manager Jodie Richards – Nursery manager Charlie Walton – Nursery Manager
Date of next review/update	28 th July 2027		