



CCTV Policy

At Walmer Bridge Day Nursery we are committed to safeguarding children and promoting their welfare. All staff, students and volunteers have a responsibility to safeguard children and protect them from harm by being vigilant, identifying and reporting any safeguarding concerns and following procedures should a child protection issue arise. To assist with safeguarding at Walmer Bridge Day Nursery, we use CCTV cameras with the nursery classrooms and outdoor areas. Our CCTV includes the recording of both video and audio.

At Walmer Bridge Day Nursery, we recognise that data protection is a very serious matter. Walmer Bridge Day Nursery is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act. This policy outlines our nursery's use of CCTV and how it complies with the Act. The nursery complies with the ICO CCTV Code of Practice to ensure it is used responsibly.

The named nursery Data Protection Officers are:

- Jayne Parkinson (nursery proprietor)
- Katy-Leigh Eastham (nursery manager)

Our nursery CCTV system is password protected and can only be accessed by these named Data Protection Officers, who are trained to understand their responsibilities under the CCTV Code of Practice.

Our nursery CCTV surveillance is intended for the purposes of:

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

The CCTV system comprises of 8 fixed cameras. These are placed inside each nursery classroom and the outdoor areas. CCTV does not cover toilets or changing areas, to maintain children's and staff's privacy and dignity. CCTV also does not cover staff-only areas including the staff room, the nursery office and the kitchen.

Included in the outside area, the CCTV covers the nursery entrance, via the car park, for safeguarding and security purposes e.g. capture images of intruders/unauthorised persons, as well as visitors, or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

The CCTV is monitored centrally from the nursery office. The nursery proprietor is also able to access the CCTV from her nursery mobile phone device. This mobile feature is only intended to be used in the event of a security breach outside of the nursery opening hours i.e. trespassing and burglary.

The footage captured by the nursery CCTV system will be routinely retained for a maximum of 7 days, using the automatic overwrite feature. However, there may be exceptions where footage needs to be saved and retained for longer than 7 days. This will be applicable where the footage identifies an issue and is retained specifically in the context of an investigation e.g. an allegation has been made against a staff member or a child has been involved in an accident or incident. Access to such saved footage, will be restricted to authorised personnel only.

In certain circumstances, the footage recordings may also be viewed by other individuals. For example, by a parent, if their child has been involved in an accident or incident. When CCTV footage recordings are being viewed, two authorised members of staff must be present. Footage should only be viewed and shared on a strict need-to-know basis. All such viewings will be recorded on a log of access, which should include:

- the date of any CCTV footage requests and details of the person(s) making the request (the name of the person and the organisation they represent)
- the date and time any CCTV footage has been viewed and the details of the person(s) it has been viewed by and if they have been provided with a copy (the name of the person and the organisation they represent)
- reasons why the person(s) required access to the CCTV footage
- how the request was dealt with will be made and kept, in case of challenge.

Individuals, including parents/carers, staff members and visitors, have the right to make a Subject Access Request (SAR) to CCTV footage, relating to themselves, under the Data Protection Act and GDPR. Individuals submitting requests for access will be asked to provide sufficient and specific information to enable the footage relating to them to be identified, including date, time and location.

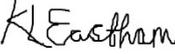
The nursery Data Protection Officers will respond to SARs within 14 calendar days of receiving the request. The nursery Data Protection Officers reserve the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation. Where requested footage contains images relating to third parties, the nursery will take appropriate steps to mask and protect the identities of those individuals, including children. All staff members are aware of the restrictions in relation to access to, and disclosure of, CCTV footage.

The nursery Data Protection Officers are responsible for ensuring:

- That the use of CCTV systems is implemented in accordance with this policy
- They oversee and co-ordinate the use of CCTV monitoring for safeguarding, 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). See the Safeguarding children and child protection 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 (i.e. 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 is stored in a secure place with access by authorised personnel only
- That images recorded are stored for a period not longer than 30 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 safeguarding issues, criminal behaviour/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.) or for parents to view child accidents, incidents and transitions

Complaints and enquiries about the operation of CCTV within the nursery should be directed to the manager of the nursery in the first instance. A copy of this CCTV policy can be provided on request to staff, parents/carers and visitors to the nursery and will be made available on the nursery website and in the policy file.

This policy was adopted on	Signed on behalf of the nursery	Date for review
21 st June 2024	Katy-Leigh Eastham (Nursery Manager) 	June 2025
This policy was reviewed on	Signed on behalf of the nursery	Changes made?
11 th March 2025	Katy-Leigh Eastham (Nursery Manager) 	No changes needed