

# Little Dukes: CCTV Policy



Policy adopted September 2025

Little Dukes Nursery Schools, 58 Buckingham Gate, London, SW1E 6AJ

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## Little Dukes: CCTV Policy

Please note – This is a group policy which is personalised at nursery level. Where there are sections in yellow, these will contain details of the person(s) in charge of the relevant area, responsible at the individual nursery school. A version of this policy with full details can be provided to you upon request by emailing [admissions@littledukesnurseries.com](mailto:admissions@littledukesnurseries.com).

### 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.

### Adopted September 2025

#### Reviewed by:

- Joanne Allen - Director of Education - Little Dukes
- Nazish Usman - Head of Safeguarding and Compliance - EYFS
- Geoff Marston - Group Compliance Director Dukes Education

**Next review due: August 2026**

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

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# 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.

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

- Promoting the 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 Act. The nursery complies with the ICO CCTV Code of Practice to ensure it is used responsibly.

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 CCTV Code of Practice 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 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.

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The CCTV system comprises of position cameras, a monitor, digital hard drive recorder and a public information sign. Cameras are located at strategic points on the premises. No camera is hidden from view, and all will be prevented from focusing on areas 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. Due to the digital recorder and effectiveness of the limited system it is not possible to guarantee that the system will detect every incident taking place on the site.

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 interaction with children
- Ensuring children are appropriately cared for
- Facilitating the identification of any activities/event 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
- Helping ensure the safety of all the users, staff, children, parents, and visitors, consistent with the respect for the individual's privacy
- 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 CCTV system is monitored centrally from the nursery office and is registered with the Information Commissioner's Office (ICO) under the terms of the Data Protection Act.

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 ICO guidance

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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 in appropriate behaviour by a member of staff.

Head teachers as part of their ongoing monitoring of practice in rooms may also review CCTV to observe moments during the day that 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

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

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- 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 of no longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings.
- 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 (including staff supervision, staff training etc.) or for parents to view child transitions.

#### **Location of cameras: Appendix 1 to be completed by Headteacher**

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.

The images and recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel.

Supervising the access and maintenance of the CCTV system is the responsibility of the Head Teacher or Nursery Manager. In certain circumstances, the recordings may also be viewed by other individuals.

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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 area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained. When accessing images, two authorised members of staff must be present, and 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): Appendix 2**

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act 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 14 calendar days of receiving the request. 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 or Nursery Manager in the first instance. Details of our Complaints Policy can be found on the nursery website and through the 'Family' parent app.

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*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:	
Date:	

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