

Oyster Bay Nursery

CCTV Policy

Date written: October 2026

Date of last update: October 2026

Date agreed and ratified by October 2026

Date of next full review: September 2027

This policy will be reviewed at least annually and/or following any lessons learnt and/or updates to national or local guidance and procedures.

Designated Safeguarding Lead (DSL)	Debra Hines
Deputy Designated Safeguarding Lead(s)	Grace Sidders Rachel Finch
Nominated Individual	Debra Hines
Nursery Manager	Grace Sidders

1. Policy statement

Oyster Bay Nursery is committed to providing a safe, secure and welcoming environment in which children can learn, play and develop. CCTV may be used to support safeguarding, security and the protection of children, staff, visitors and nursery property.

The nursery recognises that CCTV captures personal information and must be operated responsibly, transparently and in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

CCTV is intended to support, and never replace, effective supervision, appropriate staffing, safeguarding procedures or professional judgement.

2. Aims and purposes of CCTV

CCTV may be used for the following purposes:

- To help protect children, staff and visitors from harm.
- To support the investigation of safeguarding concerns, incidents or accidents where appropriate.
- To help prevent and investigate unauthorised access, theft, vandalism or other security incidents.
- To protect nursery buildings, equipment and property.
- To assist appropriate investigations where there is a legitimate and lawful reason to review footage.

CCTV will not be used for purposes that are incompatible with these aims. It will not routinely be used to monitor staff performance or individual children's behaviour.

3. Location and use of cameras

CCTV cameras will only be installed in locations where their use is considered necessary and proportionate to the nursery's identified security or safeguarding needs.

Cameras may be positioned in areas such as entrances, exits, external access points and other suitable communal areas, following an assessment of privacy risks.

CCTV cameras must not be installed in toilets, changing areas or other locations where individuals have a heightened expectation of privacy.

The nursery will consider whether a less intrusive measure could achieve the same purpose before installing or repositioning a camera.

The use of CCTV will be reviewed periodically to ensure that camera locations and recording arrangements remain appropriate.

4. Live monitoring and recording

The nursery will determine whether CCTV is monitored live, recorded for later review, or both, and will explain these arrangements to relevant individuals.

Access to live images and recorded footage will be restricted to authorised personnel.

CCTV will not be used as a substitute for staff being physically present, actively supervising children and responding promptly to their needs.

Audio recording will be disabled by default. Audio recording will not be introduced unless the nursery can demonstrate a specific, compelling and lawful need and has completed an appropriate privacy assessment.

5. Informing parents, carers, staff and visitors

The nursery will make individuals aware that CCTV is in operation through clear and visible signage at appropriate entrances and monitored areas.

Staff will be informed about the operation of the CCTV system and their responsibilities through appropriate induction, training and policy updates.

The nursery will identify and document the lawful basis for processing CCTV footage. Consent will not automatically be treated as the lawful basis for routine CCTV recording.

6. Access to CCTV footage

Only authorised individuals, such as the Nursery Manager or Nominated Individual and specifically authorised personnel, may access CCTV footage.

Footage may be reviewed where there is a legitimate reason, including a reported safeguarding concern, an accident, a security incident or a lawful request from an appropriate authority.

Staff must not access footage out of curiosity, use it for personal reasons, make unauthorised copies or share it with colleagues or other individuals who have no legitimate need to see it.

All access and disclosures should be appropriately controlled and, where practicable, recorded.

7. Sharing CCTV footage

CCTV footage may be shared where there is a lawful and appropriate reason, including with:

- The police, where footage is relevant to a criminal investigation or other lawful request.
- Local authority safeguarding teams or children's social care, where necessary to protect a child or investigate a safeguarding concern.
- Ofsted or another authorised regulatory body, where legally appropriate.
- Other relevant authorities or professionals where disclosure is necessary, proportionate and lawful.

Footage will not be shared casually, posted on social media or distributed to parents, staff or other individuals without proper consideration of privacy and data protection requirements.

Where footage includes other children, parents, staff or visitors, the nursery will consider the rights and privacy of everyone shown before deciding what can appropriately be disclosed.

8. Requests to view or obtain footage

Individuals may request access to CCTV footage in which they are identifiable. Such requests should be made in writing to the Nursery Manager at oysterbaynursery@joylane.kent.sch.uk

The nursery will assess each request in accordance with data protection law. This may involve identifying the relevant date, time and location, protecting the rights of other individuals shown in the footage and considering whether blurring, redaction or another appropriate method is required.

Requests will be handled within the applicable legal time limits. The nursery will not automatically provide unrestricted footage simply because a parent or carer has parental responsibility for a child.

Where a request relates to a safeguarding concern, the nursery will also consider its safeguarding responsibilities and seek appropriate advice where necessary.

9. Storage and retention of footage

CCTV footage will be stored securely, with access limited to authorised personnel. Appropriate technical and organisational measures will be used to protect footage against loss, unauthorised access, alteration or disclosure.

The nursery will retain routine CCTV footage for the shortest period reasonably necessary for its stated purposes.

Routine retention period: 14 days

Where footage is required for a specific safeguarding concern, complaint, accident, legal matter or investigation, it may be retained for longer where this is necessary and lawful. The reason for extending retention should be documented, and the footage should be securely deleted when it is no longer required.

Footage will be securely deleted or overwritten in accordance with the nursery's retention arrangements.

10. Safeguarding concerns and incidents

CCTV may provide useful information when reviewing a concern or incident, but footage alone will not determine whether a safeguarding allegation is substantiated.

Any safeguarding concern must be reported promptly in accordance with the nursery's Safeguarding and Child Protection Policy.

The Designated Safeguarding Lead (DSL) and Nursery Manager will follow the relevant reporting and referral procedures. CCTV footage may be preserved where it could be relevant to a safeguarding investigation.

Staff must not delay reporting a concern while waiting for CCTV footage to be reviewed.

11. Staff responsibilities

All staff must:

- Follow this policy and the nursery's safeguarding and data protection procedures.
- Respect the privacy and dignity of children, families, colleagues and visitors.
- Never attempt to access, copy, download or share footage without authorisation.
- Report suspected misuse, unauthorised access or loss of footage to the Nursery Manager immediately.
- Continue to follow all supervision, safeguarding and professional conduct requirements, regardless of whether CCTV is present.

Any suspected misuse of CCTV by a staff member may be addressed through the nursery's disciplinary procedures and, where appropriate, referred to relevant authorities.

12. Data breaches

Any suspected loss, unauthorised disclosure, inappropriate access or other security breach involving CCTV footage must be reported immediately to the Nursery Manager or the person responsible for data protection.

The nursery will investigate the incident, take steps to limit any harm, document the breach and notify affected individuals or the Information Commissioner's Office (ICO) where legally required.

13. Data protection and privacy responsibilities

The Nominated Individual is responsible for ensuring that CCTV is operated in line with this policy and applicable data protection requirements.

The nursery will maintain appropriate records of its CCTV purposes, lawful basis, retention arrangements, access controls and relevant privacy risk assessments. A Data Protection Impact Assessment (DPIA) will be completed where required and considered before introducing or significantly changing CCTV arrangements.

The nursery will also check whether it must pay the ICO data protection fee or qualifies for an exemption.

14. Complaints and queries

Parents, carers, staff and visitors who have questions or concerns about CCTV may contact:
Contact: Nominated Individual: Debra Hines
Email: oysterbaynursery@joylane.kent.sch.uk

Concerns will be considered fairly and promptly. Individuals who remain dissatisfied may contact the Information Commissioner's Office (ICO).