



Closed Circuit Television (CCTV) Policy and Procedure

Policy

At Skylarks Community Preschool, we rent our hall space from the Broadbridge Heath Village Centre. The CCTV surveillance system across the premises is owned, maintained, and physically monitored by the Village Centre management. However, during our contracted hours, the preschool operates as a joint Data Controller for the safeguarding, security, and welfare of our children, staff, parents, and visitors. The use of CCTV at the setting is strictly informed by the guiding principles of the Surveillance Camera Code of Practice (Home Office 2013) and the UK GDPR / Data Protection Act 2018, executed as follows:

Procedures

Specified and Legitimate Purpose

The surveillance system is used strictly to support the safety and well-being of children, staff, and visitors; to protect the setting's assets; to assist in the detection of crime; and to ensure the safeguarding and welfare requirements of the Early Years Foundation Stage (EYFS) are met. CCTV is never used without a specified purpose. Footage is never reviewed by staff members who do not have explicit authority and a specific, legitimate reason to do so.

Respect for Privacy and Annual Review

The setting respects every individual's right to a private life under the Human Rights Act (1998). Accordingly, cameras are only located in public/communal spaces of the rented facility (e.g., reception/entrance areas and main group rooms). No cameras are permitted in private welfare areas, such as toilets or nappy-changing zones. The owners/directors/trustees will review the continued use of CCTV annually and discuss any operational issues during routine supervision with the Setting Manager.

Transparency and Clear Signage

Prominent signs are clearly displayed by the Village Centre and the Preschool at all entrance points. These signs inform staff, parents, and visitors that CCTV is in operation and that images are being recorded. This policy and its procedures are available to view at any time. Any complaints relating to the use of CCTV should be raised with the Setting Manager in the first instance, following Procedure Complaints Procedure for Parents/Carers and Service Users.

Responsibility and Accountability

While the Village Centre maintains the physical infrastructure, the Setting Manager holds day-to-day accountability for the preschool's surveillance activities during session hours. Images are automatically retained securely on the system for up to 4 weeks (28 days) before being overwritten. Images are not routinely scrutinized unless a legitimate trigger occurs, such as an official complaint, a child protection allegation, or an incident reported by a child, parent, staff member, or visitor.

Clear Operational Records

All staff are trained on this policy and understand their roles and responsibilities. The setting maintains a secure administrative register detailing:

- The name of the Setting Manager responsible for daily CCTV monitoring protocols.
- The name of the Setting Manager's line manager.
- The specific name/model of the CCTV system used by the venue.

- The exact number and physical positions of the cameras active during sessions.
- The names of staff authorized to request or view images.
- The contact number for the Village Centre's CCTV maintenance team.

Minimal Storage and Timely Erasure

No more data is captured or stored than is strictly necessary to fulfil the safety and safeguarding purposes of the system. Images are automatically securely deleted or recorded over after 4 weeks. However, images will not be destroyed or overwritten before this time if an official legal request or safeguarding inquiry to view them has been formally lodged.

Strict Access Controls and Law Enforcement Disclosure

Access to retained footage is tightly restricted. Only the Setting Manager, their line manager, and the Deputy Manager have the authority to request or view footage. If an incident or allegation requires a review of the footage, the Setting Manager will coordinate with the Village Centre operators.

If required for an official investigation, footage will be securely shared with the Police, Local Authority Safeguarding Partners (LADO), Ofsted, or our childminder agency. A mandatory CCTV Processing Ledger will be maintained, documenting:

- The date and time of the incident/allegation.
- The specific camera numbers and angles reviewed.
- A brief description of the incident (referencing related internal safeguarding files).
- The names of the authorized personnel who viewed the footage, the date viewed, and actions taken.
- A countersign from a senior member of staff.

Maintaining Professional Competency Standards

The Setting Manager and line management stay fully informed of local and national regulatory updates regarding surveillance in early years settings. The Setting Manager ensures that all staff understand their duty to adhere to Record Keeping Procedures, which outlines data management and how individuals may request copies of their data.

Robust Data Security Measures

The Setting Manager, in cooperation with the Village Centre landlords, ensures that appropriate physical and digital security measures are in place to safeguard the system against unauthorized access. This includes ensuring the recording unit (DVR) is kept in a locked, secure location with encrypted, password-protected user accounts.

Effective Audit and Review Mechanisms

The Setting Manager is responsible for ensuring these standards are met in daily practice. They will seek immediate guidance from the owners, directors, or trustees whenever an incident requires formal extraction or scrutiny of surveillance data.

Evidential Value and Incident Processing

Under no circumstances is CCTV footage shared directly with parents or other service users unless there is an exceptional, legitimate reason to do so (e.g., to clearly disprove a false allegation against a staff member).

The formal workflow for responding to an incident is as follows:

1. An allegation or incident occurs that may have been captured on the system.
2. The Setting Manager requests a review of the footage from the Village Centre operators, reviews it, and logs the findings in the secure ledger.
3. The Setting Manager reports all findings directly to the owners, trustees, or committee.
4. If there is a reason to believe a crime or breach of safeguarding has occurred, an immediate investigation is launched in line with Procedure Safeguarding Children, Young People, and Vulnerable Adults and Procedure Record Keeping.

5. Any parent, carer, or individual whose image was recorded has the right to submit a Subject Access Request (SAR) to the Setting Manager in writing.
6. In accordance with data protection laws, the Manager reserves the right to refuse a viewing request if it compromises third-party child privacy or prejudices the prevention or detection of a crime.
7. If an access request is refused, the legal reasons are documented, and the applicant is notified in writing within 28 days. The relevant footage will be protected from the automatic 4-week deletion cycle and securely stored until the dispute is fully resolved.

This procedure was adopted by	Skylarks Community Preschool	<i>(name of provider)</i>
On	1 st August 2026	<i>(date)</i>
Date to be reviewed	1 st August 2027	<i>(date)</i>
Signed on behalf of the provider		
Name of signatory	Kathleen Thomson	
Role of signatory (e.g. chair, director or owner)	Manager/Trustee	