



The Butterfly Rooms (Incorporating Woodlands) LTD

Tank Hill Road | Purfleet | Essex | RM19 1TA

Registered Charity Number: 1148068 | Ofsted Number: 453859 | Company Number: 7984150 | *Limited by Guarantee*

Telephone Number: 01708 863 737

CCTV Policy

Purpose and Legal Framework

The Butterfly Rooms operates a Closed-Circuit Television (CCTV) system to support the safeguarding, safety, and welfare of children, staff, parents, and visitors, and to protect nursery premises and property.

Oversight of the CCTV system is the responsibility of the Business Manager and Chairperson, acting on behalf of the Data Controller.

This policy complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (as amended 2025)
- Information Commissioner's Office (ICO) CCTV and video surveillance guidance
- Surveillance Camera Code of Practice (Protection of Freedoms Act 2012)
- Children Act 1989 and 2004
- Working Together to Safeguard Children (2026)
- EYFS Statutory Framework (current version)
- Ofsted safeguarding and inspection expectations
- Thurrock Local Safeguarding Partnership guidance

A Data Protection Impact Assessment (DPIA) has been completed and is reviewed regularly, particularly if the system or its use changes.

CCTV System Overview

The nursery uses **Anran security cameras** with **8 fixed-position cameras**, located in:

- Nursery rooms (LA, AA, LC & LE)
- Main entrance / front garden
- Back garden
- Baby garden

The system operates under the following principles:

- Cameras are overt, visible, and used transparently
- Cameras are **not installed** in toilets, nappy changing areas, staff rooms, or offices to maintain privacy and confidentiality

- Cameras have the capability to record audio; however, **audio recording is permanently switched off on all devices**
- CCTV does not provide live streaming to parents or third parties
- CCTV does not guarantee that all incidents will be captured

Clear and updated signage is displayed throughout the nursery and at all entrances stating:

- CCTV is in operation
- The purpose of surveillance
- Who to contact regarding data rights

Lawful Basis and Use of CCTV

CCTV footage is processed under **UK GDPR Article 6(1)(f) – Legitimate Interests**, supported by safeguarding duties under relevant child protection legislation.

CCTV is used only where necessary, proportionate, and in the best interests of children for the following purposes:

- Safeguarding children and promoting their welfare
- Supporting safe care practices and staff supervision
- Maintaining a secure nursery environment
- Assisting investigations into safeguarding concerns, incidents, complaints, or disciplinary matters (where appropriate)
- Preventing and detecting crime, theft, vandalism, or unauthorised access
- Supporting statutory investigations by authorised agencies

CCTV is **not used for routine staff performance monitoring or continuous observation**, in line with ICO guidance and Ofsted expectations regarding proportionality and privacy.

Recording, Storage and Security

- CCTV operates **24 hours a day**
- Footage is stored securely on an encrypted system
- Recordings are retained for **30 days** and are then automatically overwritten
- Where footage is required for safeguarding, disciplinary, or legal purposes, it will be securely isolated and retained only for as long as necessary

Access to CCTV footage is strictly limited to:

- Business Manager
- Chairperson
- Authorised statutory agencies (e.g. Police, LADO, safeguarding partners)

All access is:

- Logged
- Monitored
- Justified in line with data protection requirements

Remote access is restricted and only permitted for authorised individuals for safeguarding or security purposes.

Data Sharing and Parental Requests

Parents and carers **do not have direct access** to CCTV footage.

Requests for footage will only be considered where:

- There is a clear lawful basis
- Disclosure does not compromise the rights, safety, or privacy of others

Where other children, staff, or visitors are visible in footage:

- Footage may be refused or redacted in accordance with ICO guidance

Footage may be shared with:

- Police
- Local Authority Designated Officer (LADO)
- Thurrock safeguarding services
- Other statutory agencies where legally required

All disclosures are:

- Recorded
- Justified
- Proportionate

Data Subject Rights

Individuals have the right to:

- Request access to their personal data (including CCTV images where identifiable)
- Request restriction or erasure where legally applicable
- Raise concerns or make complaints regarding CCTV use

Requests must be made in writing to the **Business Manager or Chairperson (Data Protection Lead)**.

Requests will be responded to within statutory timescales in line with UK GDPR.

Individuals have the right to escalate concerns to the Information Commissioner's Office (ICO) if they remain dissatisfied.

Safeguarding, Staff Supervision and EYFS Ratios

CCTV systems are used to **support safeguarding but do not replace staff supervision**.

The nursery ensures:

- EYFS staff-to-child ratios are always maintained
- Appropriate staff deployment and supervision practices are in place

Where a staff member is working alone in a room:

- This is permitted only in line with EYFS requirements
- A suitably qualified practitioner (Level 3 or above) must be present on site
- Management approval must be in place

CCTV may act as an additional safeguarding measure but must never be relied upon as a replacement for safe staffing practices.

Confidentiality and Privacy

The nursery is committed to protecting the dignity, rights, and privacy of all individuals.

To support this:

- No cameras are installed in private or sensitive areas

- No cameras are installed in staff rooms or offices
- Audio recording is disabled on all cameras
- CCTV use remains proportionate and justified at all times

Complaints, Monitoring and Review

All concerns or complaints relating to CCTV will be:

- Taken seriously
- Investigated promptly
- Responded to appropriately

This policy is reviewed:

- Annually
- Following any significant change to the CCTV system
- Following updates to legislation, EYFS, Ofsted, or local safeguarding guidance

All staff:

- Are made aware of this policy
- Receive appropriate training in confidentiality and data protection

This policy was adopted by

The Butterfly Rooms (Incorporating
Woodlands) Ltd

On

1st July 2026

Date to be reviewed

1st July 2027

Signed on behalf of the Management
committee

A.Thompson

Name of signatory

Miss Aimee Thompson