

Data Protection Impact Assessment (DPIA)



Nurture and Grow Childcare

Use of CCTV with Audio – Nurture and Grow Childcare

Project or Activity Title

Installation of CCTV with audio recording at the external front entrance and rear garden.

Purpose of the Processing

To promote the safety and security of children, staff, parents, and visitors, and to:

- Deter unauthorised access and antisocial behaviour.
- Monitor safeguarding concerns during drop-off/pick-up times and outdoor play.
- Support investigations into incidents occurring in outdoor areas.

Description of the Processing

Element	Details
Type of Data	Video and audio recordings (audio is external only). No facial recognition or biometric data.
Recording Areas	External front entrance and rear garden only. No internal rooms have audio recording.
Audio Capture	Conversations near entrances and in the outdoor play space may be recorded. No two-way audio function.
Storage & Retention	Data stored securely on an encrypted system. Retained for up to 30 days, unless required for an investigation.
Access	Only senior management and DSLs have access. Access is logged and monitored.

Legal Basis for Processing

Processing is based on Legitimate Interests under Article 6(1)(f) of UK GDPR:

"Processing is necessary for the purposes of the legitimate interests pursued by the controller... except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject."

Safeguarding and security of children and staff justify the limited use of audio outdoors.

Data Protection Impact Assessment (DPIA)



Nurture and Grow Childcare

Data Subjects Affected

- Children in outdoor play areas
- Staff working in outdoor or entry zones
- Parents, carers, and visitors entering or exiting the building

Assessment of Necessity and Proportionality

Principle	Explanation
Necessity	Audio supports safeguarding and security without infringing on internal privacy.
Proportionality	Audio is restricted to external areas where there is no reasonable expectation of private conversation.
Minimisation	No audio inside the nursery. No recording in toilets, changing rooms, or sleep areas.
Transparency	Clear signage in place. Privacy notice updated. Staff and parents informed.
Access Controls	Only designated staff can view recordings. Audit logs maintained.

Risks Identified and Mitigations

Risk	Mitigation
Privacy concerns over audio recording	Audio is limited to external areas only; no audio indoors. Clear signage and privacy notices issued.
Unauthorised access to footage	Secure system with restricted access, password protection, and access logs.
Misuse of audio recordings	Staff trained on data handling. Policy prohibits use for non-safeguarding or disciplinary monitoring.
Data breach	Encrypted storage and regular security updates. Regular review of system access and retention.

Consultation

- Parents and staff have been informed via formal notification and updated privacy policies.
- Signage reflects the presence of CCTV with audio in external areas.

Data Protection Impact Assessment (DPIA)



Nurture and Grow Childcare

Review and Approval

DPIA Completed By	Tracey Doidge
Role	Director/ Data Protection Lead
Date Completed	9 th September 2025
Next Review Date	8 th September 2025