

LIBRA School

Closed Circuit Television (CCTV)

Date	Review Date	Coordinator	Nominated Director
25.05.18	24.05.19	Kirsty Crosby	Joan Wilkes

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- Health and Safety at Work Act 1974
- Employers' Health and Safety Policy Statements (Exception) Regulations 1975
- Safety Representatives and Safety Committees Regulations 1977
- Health and Safety (Display Screen Equipment) Regulations 1992
- Data Protection Act 1998
- Human Rights Act 1998
- Provision and Use of Work Equipment Regulations 1998
- Management of Health and Safety at Work Regulations 1999
- Education (School Premises) Regulations 1999
- Freedom of Information Act 2000
- Regulation of Investigatory Powers Act 2000
- Equality Act 2010
- School Premises (England) Regulations 2012

The following documentation is also related to this policy:

- CCTV Code of Practice (Information Code of Practice)
- Equality Act 2010: Advice for Schools (DfE)
- Managing for Health and Safety (HSE)
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

We have installed Closed Circuit Television (CCTV) surveillance equipment in order to deter unauthorised trespass to the school grounds and premises. It is used for the purposes of monitoring and recording the young people during education to safeguard both them and staff against allegations, complaints and for behavioural reviews, as well as lesson observations as part of teaching staff appraisal system and professional development, health and safety areas, and fire drills, security of school premises and property, and traffic flow monitoring. Monitoring is communicated to those involved.

We believe it is essential to have in place exceptional school security systems to protect pupils, school staff, equipment, visitors, the school grounds and premises. Therefore, we feel that CCTV helps in establishing a school environment where everyone feels safe and secure as it is able to monitor activities in the school grounds and premises that could affect our security, safety and wellbeing.

LIBRA has identified the needs of a CCTV system by using the following categories:

- **Monitoring:** to watch the flow of traffic or the movement of people where you do not need to pick out individual figures.

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- Detecting: to detect the presence of a person in the image, without needing to see their face.
- Recognising: to recognise somebody you know, or determine that somebody is not known to you.
- Identifying: to record high quality facial images

Under no circumstances will Closed Circuit Television (CCTV) be installed in pupils' toilets.

We have registered the CCTV system with the Information Commissioner under the terms of the Data Protection Act 1998 and we are aware that all recorded CCTV material is covered by this Act.

We will ensure that the rights of individuals are upheld by complying with the Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000, and the CCTV Code of Practice issued by the Information Commissioner.

We are aware that the General Data Protection Regulations (GDPR) will entirely replace the current Data Protection Act (DPA) by making radical changes to many existing data protection rules and regulations that schools, academies and other educational establishments adhere to under the DPA. The principal aim of the GDPR is to strengthen and unify the safety and security of all data held within an organisation.

We acknowledge the new guidance given to all schools in the 'Data protection: a toolkit for schools' (DfE April 2018) regarding safeguarding and potentially CCTV.

We wish to work closely with the School Council and to hear their views and opinions as we acknowledge and support Article 12 of the United Nations Convention on the Rights of the Child that children should be encouraged to form and to express their views.

We as a school community have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

The benefits with the system are that it helps to prevent incidents, near misses, provides a record of visual data, deters violent acts and vandalism, helps to detect criminal or suspicious activity and should any offence be committed it provides valuable evidence. Due to the fairly isolated location of our premises and that it is not manned 24 hours a day, 7 days a week combined with the nature of the young people who attend the school, it is imperative that this line of monitoring and recording is used here, as we need to be able to identify individuals.

At the present time CCTV is the most effective technology available to us for the purpose required, should more appropriate and cost effective options be available, they will be considered and reviewed accordingly. We will address any future demands for wider use of images as and when they arise.

The Data Protection Officer (DPO) is responsible for control of the images and makes decision on how these should be used effectively and in line with guidance, identifying clearly defined and specific purposes for the use of images, this is communicated directly to

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the person who operates the system. The DPO is also aware that they should do all they can to minimise intrusion for those who may be monitored, and particularly if specific concerns have been expressed.

The Information Commissioner's Officer (ICO) has been notified that our Data Protection Officer (DPO) is Mrs Kirsty Crosby via the registration documents submitted in September 2013. The purposes for which the images are used, the disclosures that are made and any other details were submitted to the ICO at that time.

In the unlikely event that LIBRA is required to undertake any processing services for an outside organisation such as editing images, a written contract would be required with clearly defined responsibilities to ensure that the images are only processed in accordance with strict instructions. The contract would also need to include guarantees about security such as storage and the use of properly trained staff.

We all have a responsibility to ensure equality permeates in to all aspects of school life and that everyone is treated equally irrespective of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We want everyone connected with this school to feel safe, secure, valued and of equal worth.

We acknowledge the findings of the Race Disparity Audit that clearly shows how people of different ethnicities are treated across the public services of health, education, employment and the criminal justice system.

The educational section of the audit that covers: differences by region; attainment and economic disadvantage; exclusions and abuse; and destinations, has a significant importance for the strategic planning of this school.

Aims

- To protect pupils, school staff, visitors, buildings, grounds and equipment from damage, arson and theft.
- To provide a secure environment for pupils, school staff and visitors to the school.
- To work with other schools to share good practice in order to improve this policy.

Responsibility of the Policy and Procedure

Role of the Directors

The Directors have:

- appointed a member of staff to be responsible for Health and Safety and a Data Protection Officer to oversee and control all aspects of the use of surveillance CCTV;
- delegated powers and responsibilities to the Headteacher to oversee all school security measures including the administration and management of the CCTV Scheme;
- delegated powers and responsibilities to the Headteacher to ensure all school staff and stakeholders are aware of and comply with this policy;
- instructed the Manager's Assistant/PA to check the CCTV system every day;
- appointed a Security Committee composed of one Director, the Headteacher, Building and Estates Manager and a member of staff;
- responsibility for ensuring that the school complies with all equalities legislation;

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- nominated a designated Equalities Director to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this policy;
- responsibility for discussing improvements to this policy with the School Council;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- responsibility for ensuring policies are made available to parents;
- responsibility for the effective implementation, monitoring and evaluation of this policy

Role of the Headteacher

The Headteacher will:

- ensure all school staff, pupils and parents are aware of the reasons for the installation and use of CCTV surveillance;
- work in conjunction with the Senior Management Team to ensure all school staff, pupils and parents are aware of and comply with this policy;
- work closely with the coordinator and Building and Estates Manager;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- ensure that security measures are in place and are effective;
- ensure that the CCTV is well maintained, managed and complies with the Information Commissioner's Code of Practice;
- ensure signs are displayed around the school building and grounds informing everyone that their image and actions might be recorded;
- ensure that all school staff are aware of CCTV surveillance procedures;
- ensure all school staff, pupils and parents are aware of and comply with this policy;
- ensure CCTV will not capture images of surrounding properties;
- ensure collected data is only kept for the shortest possible time;
- work closely with the coordinator;
- monitor the effectiveness of this policy;
- annually report to the Governing Body on the success and development of this policy

Role of the Data Protection Officer

The Data Controlling Officer will:

- attend appropriate training;
- oversee and control all aspects of the use of surveillance CCTV and data collected from it;
- know how to deal with request for CCTV images;
- record all requests for CCTV images;
- monitor the effectiveness and impact of the CCTV system on the school community,
- have expert knowledge of data protection law and practices;
- inform the school and school personnel about their obligations to comply with the GDPR and other data protection laws;
- ensure data management is strengthened and unified;
- monitor compliance with the GDPR and other data protection laws;
- manage internal data protection activities;
- ensure risk and impact assessments are conducted in accordance with ICO guidance;
- report data breaches within 72 hours;

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- ensure individuals have greater control over their personal data;
- ensure that prior to the processing of an individual's data that:
 - the process is in line with ICO guidance;
 - the process is transparent;
 - the individual will be notified;
 - the notification is written in a form that is understandable to children;
 - when sharing an individual's data to a third party outside of school that details for the sharing are clearly defined within the notifications.
- share an individual's data where it is a legal requirement to provide such information;
- process all written subject access requests from individuals within 40 days of receiving them;
- have in place a formal contract or service level agreement with a chosen data processor who is GDPR compliant;
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance;
- train school personnel;
- conduct audits.
- be the first point of contact for supervisory authorities and for individuals whose data is processed;
- keep up to date documentation of all data protection activities.
- work closely with the Headteacher and nominated Director;
- periodically report to the Headteacher and Directors.

Role of the Security Committee

The Security Committee will:

- ensure CCTV cameras are placed in identified strategic positions around the school premises;
- ensure CCTV cameras are not installed in pupils' toilets;
- ensure CCTV cameras are used to combat bullying and vandalism;
- ensure CCTV cameras are checked every day;
- ensure CCTV cameras are in constant operation all year round;
- ensure CCTV cameras are annually maintained;
- ensure training will take place periodically for the appropriate school staff who deal with the CCTV surveillance equipment;
- monitor the number of incidents recorded by CCTV;
- monitor the effectiveness of the CCTV surveillance equipment

Role of the Directors

The Directors will:

- work closely with the Headteacher and the coordinator;
- ensure this policy and other linked policies are up to date;
- ensure that everyone connected with the school is aware of this policy;

Role of School Staff

School staff will:

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- comply with all aspects of this policy
- undertake appropriate training in security procedures;
- inform and remind pupils of security procedures
- comply with all aspects of this policy;
- implement the school's equalities policy and schemes;
- report and deal with all incidents of discrimination;
- attend appropriate training sessions on equality;
- report any concerns they have on any aspect of the school community

Role of Pupils

Pupils must be aware that CCTV is in place for security purposes and that under no circumstances will images be captured of pupils changing.

Role of the School Council

The School Council will be involved in:

- determining this policy with the Co-ordinator;
- discussing improvements to this policy during the school year;
- reviewing the effectiveness of this policy with the Governing Body

Role of Parents/Carers

Parents/carers will be aware of and comply with this policy.

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus
- the school website
- the Staff Handbook
- meetings with school staff
- information displays in the main school entrance

Training

We ensure all school staff have equal chances of training, career development and promotion.

Periodic training will be organised for all school staff so that they are kept up to date with new information and guide lines concerning equal opportunities.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Monitoring the Effectiveness of the Policy

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The practical application of this policy will be reviewed annually or when the need arises by the coordinator, the Building and Estates Manager and the Directors.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Directors for further discussion and endorsement. (See Policy Evaluation)

Linked Policies

▪ Health & Safety	▪ Health & Safety - Responsibilities	▪ Premises Manager
▪ Risk Assessment	▪ Workplace Environment	▪ School Security
▪ Data Protection	▪ Photographic and Video Images (Use of) Policy	▪

Director:		Date:	25.05.18
Head Teacher:	Kirsty Crosby	Date:	25.05.18

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Initial Equality Impact Assessment

Please complete an initial equality impact assessment once this policy has been customised to suit your purposes.

Policy Title	The aim(s) of this policy	Existing policy (✓)	New/Proposed Policy (✓)	Updated Policy (✓)
CCTV	As stated			✓

This policy affects or is likely to affect the following members of the school community (✓)	Pupils	School Staff	Parents/carers	Directors	School Volunteers	School Visitors	Wider School Community
	✓	✓	✓	✓	✓	✓	✓

Question	Equality Groups																		Conclusion							
Does or could this policy have a negative impact on any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'yes' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS		
		✓				✓				✓				✓				✓				✓			Yes	No
Does or could this policy help promote equality for any of the following?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS		
	✓			✓			✓			✓			✓			✓			✓			✓			Yes	No
Does data collected from the equality groups have a positive impact on this policy?	Age			Disability			Gender			Gender identity			Pregnancy or maternity			Race			Religion or belief			Sexual orientation			Undertake a full EIA if the answer is 'no' or 'not sure'	
	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS	Y	N	NS		
	✓			✓			✓			✓			✓			✓			✓			✓			Yes	No

Conclusion	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.
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Preliminary EIA completed by	Date	Preliminary EIA approved by	Date
Julie Farr	18.05.18	Joan Wilkes	25.05.18

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Policy Evaluation

Points to be considered	Yes	No	N/A	Please supply evidence
• Policy annually reviewed	✓			
• Policy in line with current legislation	✓			
• Coordinator in place	✓			
• Nominated Director in place	✓			
• Coordinator carries out role effectively	✓			
• Headteacher, coordinator and Directors work closely	✓			
• Policy endorsed by Directors	✓			
• Policy discussed at Directors meetings when required	✓			
• School staff aware of this policy	✓			
• School staff comply with this policy	✓			
• Pupils aware of this policy	✓			
• Parents aware of this policy	✓			
• Visitors aware of this policy	✓			
• Local community aware of this policy			✓	
• Funding in place	✓			
• Policy complies with the Equality Act	✓			
• Equality Impact Assessment undertaken	✓			
• Policy referred to the School Handbook	✓			
• Policy available from the school office	✓			
• Policy available from the school website	✓			
• School Council involved with policy development	✓			
• All stakeholders take part in questionnaires and surveys			✓	
• All associated training in place	✓			
• All outlined procedures complied with	✓			
• Linked policies in place and up to date	✓			
• Associated policies in place and up to date	✓			
A statement outlining the overall effectiveness of this policy				
It is effective and suitable for purpose				