

**Freedom of information policy**

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 2018
- 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 are aware that the General Data Protection Regulations (GDPR) has entirely replaced the previous Data Protection Act (DPA) making changes to many existing data protection rules and regulations that schools, academies and other educational establishments adhered 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 have installed Closed Circuit Television (CCTV) surveillance equipment in order to deter unauthorised trespass to the school grounds and assist in the monitoring of the safety and security of student's, this may extend to investigation of incidents of student behaviour and/or bullying. Under no circumstances has it been introduced to monitor performance or capability of pupils, parents or school personnel.

We believe it is essential to have in place exceptional school security systems to protect pupils, school personnel, 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.

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 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.

We all have a responsibility to ensure equality permeates into 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.

We believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

### **Aims**

- To protect pupils, school personnel, visitors, buildings, grounds and equipment from damage, arson and theft.
- To provide a secure environment for pupils, school personnel and visitors to the school.
- To ensure compliance with all relevant legislation connected to this policy.
- To work with other schools and the local authority to share good practice in order to improve this policy.

### **Responsibility of the Policy and Procedure**

#### **Role of the Governing Body**

The Governing Body has:

- Appoint 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 personnel and stakeholders are aware of and comply with this policy;
- appointed a Site Manager who will ensure the functionality of the system including regular maintenance checks;
- responsibility for ensuring that the school complies with all equalities legislation;
- responsibility for ensuring funding is in place to support this policy;
- responsibility for ensuring this policy and all policies are maintained and updated regularly;
- make effective use of relevant research and information to improve this policy;
- 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:

- work in conjunction with the Senior Leadership Team to ensure all school personnel, pupils and parents are aware of and comply with this policy;
- ensure all school personnel, pupils and parents are aware of the reasons for the installation and use of CCTV surveillance;
- undertake an impact assessment before CCTV is installed by considering the following:
  - the exact purpose for the use of surveillance CCTV;
  - the coverage;
  - the amount of equipment;
  - the time periods of surveillance;
  - the use of the data collected and how it will affect those monitored;
  - the restrictions on the use of data collected;
  - the storage and retention of data collected;
  - the identification of school personnel who have access to the data collected;
  - the method(s) of how those whose images have been captured on CCTV will be informed;
  - the implications of outsourcing the monitoring of CCTV surveillance.
- 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 personnel are aware of CCTV surveillance procedures;
- ensure CCTV will not capture images of surrounding properties;
- ensure collected data is only kept for a reasonable period of time;
- ensure all school personnel, pupils and parents are aware of and comply with this policy;
- make effective use of relevant research and information to improve this policy;
- provide guidance, support and training to all staff;
- provide leadership and vision in respect of equality;
- work closely with the coordinator;

### **Role of the Data Protection Officer**

The Data Protection Officer, with support from the the School ICT Management Group, will:

- attend appropriate training;
- oversee 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 from external agencies;
- 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;
- ensure individuals rights to their personal data are protected;
- 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;
- ensure the secure disposal of redundant data and IT hardware holding data in compliance with ICO guidance;
- ensure relevant school personnel are suitably trained;
- be the first point of contact for supervisory authorities and for individuals whose data is processed

### **Role of School Personnel**

School personnel will:

- 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 or using the toilet facilities.

### **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 website;

### **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 Implementation and Effectiveness of the Policy**

The practical application of this policy will be reviewed tri-annually or when the need arises by the coordinator, the Headteacher and the governing body.

Date approved by governors	Dec 2020
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Date for review	Dec 2023
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