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\_\_\_\_\_ learners who aspire for themselves and inspire others

# Data Management Policy

## (CPS-NS-P-POL-016)

Revision Number	Comments	Date
01	Document Reformatted	May-22
02		
03		
04		

### Endorsement

This procedure was endorsed for use at the Full Governor Body meeting dated:  
14-Mar-2022

## Table of Contents

*(To update the table of contents in Word – right click and choose “Update Field and then choose ‘Update Entire Table’ – this will update automatically, putting the major number and headings as the contents)*

Table of Contents .....	2
1. Introduction.....	3
2. Data Protection .....	3
3. Privacy Notice – How we use personal information.....	5
4. The Freedom of Information .....	8
5. Use of Images including the use of CCTV .....	10
6. Evaluation & Review .....	15

There are four main sections to this policy:

### Data Protection

- The school is registered as a Data Controller, with the Information Commissioner’s Office (ICO).
- This section describes the responsibility of school as a Data Controller and the way we keep data safe within the new General Data Protection Regulations 2018.

### Privacy Notice

- There are certain contexts within which we are legally allowed or required to share and exchange information with third parties.
- This section outlines the agreements and permissions which are established in order to appropriately share and exchange information about students and their parents.

### Freedom of Information

- Through the Freedom of Information legislation, passed in 2000, we are legally obliged to provide information, within certain limitations, upon request.
- This section describes the nature of the information that is obtainable under this legislation and how it is possible to access or request information.

### Use of Images including the use of CCTV equipment

- It is commonplace to use images of students in education. Certain uses of images are within the rights of the school whereas students and parents have the right to restrict how images are shared publicly.
- This section sets out the arrangements in place to manage access to student images and how parents and students are asked their preferences.
- We make use of CCTV equipment to maintain student and staff welfare on site as well as to monitor site security.
- This section sets out why and how we use CCTV facilities.

The school is the Data Controller of personal data that it collects and receives for the purposes set out in this Policy. The school has a Data Protection Officer, Mr W Brand, Assistant Headteacher.

## 1. Introduction

In accordance with Section 29(1) of the Education Act 2002, all maintained school must have and publish [policies/procedures](#) to deal with Data Management.

Calthorpe Park School is dedicated to providing the best possible education and support for its students.

## 2. Data Protection

The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes. The school has a Data Protection Officer, as noted on the front of this Policy.

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data

### **Purpose**

This policy sets out how the school deals with personal information correctly and securely and in accordance with the GDPR, and other related legislation. This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

### **What is Personal Information/ data?**

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

### **Data Protection Principles**

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)
3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;

5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Personal data shall be processed in a manner that ensures appropriate security of the personal data.

### **Duties**

Personal data shall not be transferred to a country or territory outside the United Kingdom, unless that country or territory ensures an adequate level of data protection. Data Controllers have a General Duty of accountability for personal data.

### **Commitment**

The school is committed to maintaining the principles and duties in the GDPR at all times. Therefore the school will, through this Policy and in alignment with the HCC guidance regarding Document Retention:

- Inform individuals of the identity and contact details of the data controller
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.
- Inform individuals of their data subject rights
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information ( known as Subject Access Requests)
- Ensure that personal information is not transferred outside the UK without the appropriate safeguards
- Ensure that all staff and governors are aware of and understand these policies and procedures.

### **Complaints**

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at [www.ico.gov.uk](http://www.ico.gov.uk)

### **Review**

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the Data Protection Officer ready for approval by the Headteacher and Governors.

**Contacts**

If you have any enquires in relation to this policy, please contact Calthorpe Park School's Data Protection Officer, who will also act as the contact point for any requests.

### 3. Privacy Notice – How we use personal information

Calthorpe Park School is a data controller. Information stored includes parental contact details, students assessment results, attendance information, behaviour and achievement notes, modes of travel, personal characteristics such as ethnic group, any special educational needs and relevant medical information.

We will not give information about students or parents to anyone outside the school without consent unless the law and agreed school procedures allows us to. We are required by law to pass some information about you to the Local Authority and the Department for Education (DfE).

**Why do we collect and use personal information?**

We collect and use personal information:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services and how well our school is doing
- Statistical forecasting and planning
- to comply with the law regarding data sharing

**The categories of personal information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons) and exclusions
- Assessment information
- Modes of travel
- Relevant medical, special educational needs and behavioural information
- Post 16 learning information

The General Data Protection Regulation allows us to collect and use pupil information with consent of the data subject, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person and where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. When the personal information is Special Category Information we may rely on processing being in the substantial public interest in addition to consent of the data subject and the vital interests of the data subject or another.

Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Childrens' Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010, including any updates or amendments.

**Collecting personal information**

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this. Where we are using your personal information only on the basis of your permission you may ask us to stop processing this personal information at any time.

**Storing personal data**

We hold pupil data for / in accordance with our retention schedule based on HCC guidance.

**Who do we share pupil information with?**

- We routinely share pupil information with:
- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)

For pupils enrolling for post 14 qualifications, the Learning Records Service will give us a pupil's unique learner number (ULN) and may also give us details about the pupil's learning or qualifications

**Why we share pupil information**

We do not share personal information with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

**Data collection requirements:**

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

**Youth support services**

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent / guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

**Our pupils aged 16+**

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

### **The National Pupil Database (NPD)**

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

### Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Mr W Brand, Assistant Headteacher, Data Protection Officer.

### Your Rights:

You also have the right, subject to some limitations to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### Contact:

If you would like to discuss anything in this privacy notice, please contact the School's Data Protection Officer as noted on the front of this Policy.

## 4. The Freedom of Information

### 4.1 Introduction : What A Publication Scheme Is And Why It Has Been Developed

Our publication scheme sets out:

- a. The classes of information which we publish or intend to publish;
- b. The manner in which the information will be published; and
- c. Whether the information is available free of charge or on payment.

The scheme covers information already published and information which is to be published in the future. All information in our publication scheme is either available for you on our website to download and print off or available in paper form. Some information which we hold may not be made public, for example personal information.

### 4.2 How to Obtain or Request Information

In the first instance visit our website at [www.cps.hants.sch.uk](http://www.cps.hants.sch.uk). A list of current policies and procedures is listed as are many other documents, guides and reference materials.

If the information you are looking for is not available via the scheme and is not on our website, you can still contact the school to ask if we have it.

If you require a paper version of any of the documents within the scheme, please contact the school by telephone, e-mail, fax or letter. Contact details are set out below.

**E-mail:** [headteacher.pa@calthorpepark.hants.sch.uk](mailto:headteacher.pa@calthorpepark.hants.sch.uk)

**Tel:** 01252 613483

**Fax:** 01252 626091  
**Contact Address:** Calthorpe Park School, Hitches Lane, Fleet, Hampshire, GU51 5JA

To help us process your request quickly, please clearly mark any correspondence “**FREEDOM OF INFORMATION REQUEST**” (in CAPITALS please).

### 4.3 Paying for Information

Information published on our website is freely available. If you don't have internet access, you can access our website using a local library or an internet café

Single copies of information covered by this publication scheme are provided free unless stated otherwise in section 6. If your request means that we have to do a lot of preparation, photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications, we will let you know the cost before fulfilling your request.

### 4.4 Classes of Information Currently Published

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'.

We are unable to provide information which might be confidential or otherwise exempt from the publication by law.

<b>Instrument of Government</b>	<p>The name, address and telephone number of the school and the type of school</p> <p>The names of the Headteacher and Chair of Governors</p> <p>A statement of the school's ethos and values, such as that found prominently on our website</p> <p>Number of students on roll and rates of students' authorised and unauthorised absences</p> <p>The number of places for students of normal age of entry in the preceding school year and the number of written applications/preferences expressed for those places</p>
<b>School Prospectus</b>	<p>Information about the school's policy on providing for students with special educational needs</p> <p>A description of the policies relating to disabled students, including facilities to improve access and the accessibility plan.</p> <p>A summary of assessment results for appropriate Key Stages, with national summary figures</p> <p>A summary of the destinations of school leavers</p> <p>The arrangements for visits to the school by prospective parents</p>

<b>Governing Body</b>	Names of members of the school governing body and how to contact the chair.
<b>Pupil and Curriculum Policies</b>	The full list of policies is presented on the school website. These include statutory documents (those the school is legally required to provide) and non-statutory documents.
<b>Records Management and Personal Data Policies</b>	Data Collection and Management Data Protection, including protection of image Privacy Notice (previously known as the Fair Processing Notice)
<b>Equality and Diversity Policies</b>	Equal Opportunities Policy
<b>Staff Recruitment</b>	Policies and Procedures for staff recruitment Details of vacancies
<b>Curriculum Circulars and Statutory Instruments</b>	Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the Headteacher or Governing Body relating to the curriculum
<b>Additional Information</b>	List of clubs and extra-curricular activities School publications – newsletters, leaflets, etc

#### 4.5 Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to the Headteacher at the school.

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made, then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints.

They can be contacted at:

Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Enquiry/Information Line: 01625 545 700

E-mail: [publications@ic-foi.demon.co.uk](mailto:publications@ic-foi.demon.co.uk)

Website: [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

## 5. Use of Images including the use of CCTV

## 5.1 Introduction

- This policy describes the correct approach for staff in taking, storing, sharing and using video or photographic images of students.
- The school is obliged to protect its students from risk associated with publishing images.

## 5.2 Policy Statements

- Each parent has the right to prevent the school from using a photograph of their child for certain applications. See Sections 3 and 7 for further information.
- The school has a right to take and use photographs and video recordings for certain uses. See Sections 3 and 6 for further information.
- Parental permission must be written and, once granted, is valid for a maximum of 5½ years and can be revoked at any time. See Section 4 for more information.
- All photographs or video recordings must be appropriate and stored securely to minimise the chance of them being placed in the public domain. See Section 5 for further information.
- The use of a student's surname must not be placed in a document that may be made available to the general public or used on the website. See section 8 for further information.
- All members of staff and students on site at school are obliged to adhere to the detail of this policy. Staff and students have responsibilities to protect the privacy and identity of others. See Section 9 for further information.
- Staff are required to delete photographs or video clips of students when they are no longer required for educational purposes.

### **Guidance and Reference Sections:**

## 5.3 Categorising the Use of Photographs

The use of photographs is grouped into two categories:

<b>Automatic Permission for educational purposes only</b> (no specific permission is required)	<b>Permission Required</b> (permission is required from the parent)
classroom activity	within a publication
unidentifiable face of student	as part of a wall display
evaluation of work	presented in the media
restricted internal audience	public audience
administration	presented on the internet,
security	shared group photograph

- The use of photographs in the left-hand column does not require the specific permission of the student or the parent. For further clarification please see Section 6 below.

- The use of photographs in the right-hand column does require the specific and written permission of the student's parents before the photograph can be used. For further clarification see Section 7 below.

#### 5.4 Obtaining Permission

- On the school's main application form, known as the Confidential Form, there is a section for parents to declare their permission. Verbal permission is not adequate. It is required that the school maintains an accurate list of written permissions that are given.
- Once permission is given, this permission is valid for a maximum of 5½ years. This relates to the period of time that the student is on role and attending the school and/or until the other students in the same intake year have left the school. Images forming part of the education record will be retained for the period of time specified for the retention of those records.
- Should parents change their mind following their granting of permission then the School should accommodate this change as far as is practical. School records must reflect this new wish and no further use of photographs may be made in the 'not permitted' group of situations. However, it would be impractical to remove the child's image from a Prospectus prior to the end natural lifetime of the publication but if the image was used in a wall display or on the website the immediate withdrawal of the image must be made.
- Parents are under no obligation to provide permission but the school is entitled to encourage parents to respond to the request for permission. Should a parent refuse to reply or return a completed letter then it must be assumed that permission has NOT been granted.

#### 5.5 Taking Photographs at School

- All photographs taken (whether intended for 'automatically permitted' use or not) must be stored securely to minimise the chance of images being released in the public domain.
- It is not permissible to take photographs of individual students or groups of students without informing them of the intended use of the images. Photographs taken for security or behaviour management reasons may be taken. Any images then taken must be used in accordance with this policy.
- The type of photograph must be absolutely appropriate and unquestioningly useful for general use. Certain situations require more consideration and the photographer must be careful to pose students who are wearing limited clothing (swimwear, sports cloths or a leotard for example) so that there is nothing compromising in the photograph.
- It is not permissible that students take photographs of students or staff generally around the school except for specific educational activity using a permitted phone, school camera/video under the supervision of a member of staff. However, students may take a photograph of friendship groups (on the last day of term for example) as long as those who participate are content with the photograph being taken.

#### 5.6 'Automatically Permitted' Situations

- No permission is required for these situations. Students are not in a position to object to their photograph being taken.

- On enrolment (or soon after) all students are to have their photograph electronically recorded and stored on the SIMS (School Information Management System) database. Photographs are re-taken during Year 9 and 11. It is permissible to use students' portrait images for administrative purposes within school.
- The school is permitted to take video recordings of students with no requirement to obtain the permission of the parents of the students in the following situations and under the described conditions:
  - In order to maximise **teaching and learning** in a practical session of drama or physical education to facilitate review and evaluation; as long as the recording tapes are not kept long-term and are not used as examples outside the school or passed on to any third party;
  - To record performance in an activity **as part of an examination or coursework** as part of an exam board's requirement; as long as the recordings made during assessments are securely dispatched to the exam board/moderator;
  - To record **events, shows and performances**; as long as the copies of the recording are not passed to any third party (including the participants) unless each and every participant has returned their parent's permission to let the recordings be circulated more widely. Note:- it is not permissible for any member of the general public to take pictures or video recordings unless the previous condition is met.

### 5.7 'Permission Required' Situations

- Written permission is required prior to photographs being taken for the use for any other situation than described in the 'automatic permission' applications. Individual students should prompt the member of staff (in a suitable manner) if their parents have not granted permission. Staff must consult the database to check that it is permissible to take the photograph.
- The following categories are described simply in an application form which parents complete. Parents are requested to tick either to record that they do or do not give their permission for each section. Each section is recorded separately.

**Category (a):** Using a photograph on printed materials

- This category includes the use of photographs in wall displays and internal newsletters and such like. The key to this category is that any circulation of the photograph is likely to be limited and kept within the wider school community.

**Category (b):** Using a photograph on the School website or other freely accessible online location:

- Images used on the website are viewable worldwide.

**Category (c):** Recording images of student on video

- This category includes the use of video recordings that are made for circulation or potential sharing. Even if a parent does not give permission for this category, the school is still entitled to take and use video recordings of the student as described in Section 6 above.

**Category (d):** Using images of student in the media (newspaper or on tv)

- This category refers specifically to newspapers or on television.

## 5.8 Students' images during online teaching sessions

- Although only school-based systems will be used (such as MS Teams) for providing online teaching sessions the inclusion of students and staff images (be these video or stills) is to be restricted.
- Students are to keep their webcams turned off during any online sessions.

## 5.9 Using Students' Names in Printed Materials or on the School Website

- The management of the use of students' names is part of maintaining the confidentiality of the identity of students.
- The following specifications describe what is not permissible when the document or presentation of text could be circulated outside the school or the parent of the student:
  - Any piece of video will not have the name of the students included who feature in the recording;
  - At no time will the full name of any student be set in print on a public document. Generally a student may be referred to Michelle G (Forename and Initial of surname) only. (Note, the only exception to this is the use of both a small photograph and the student's name in a document such as the Year Book which is created in Year 11. Since this document would feature in the 'permission required' category the permission of the parent would need to be obtained in order to use photograph in this way.
  - At no time will any personal information be included, such as email address, postal address, telephone number or similar.

## 5.10 Specifying Responsibilities

- **The Student** – each student should inform the potential photographer prior to any photograph being taken where there is a potential cause for the photograph to be unusable due to parental permission not being given.
- **The Photographer** – whoever is taking photographs or video recordings must ascertain whether the students' parents have given permission. Before the photograph is taken the permission's database must be consulted.
- **The school** nominates a member of staff to administer this policy, to routinely request parents' permission and to record the permissions granted in a suitable form for convenient reference for other staff.
- **All staff** who have access to photographs of students, whether they have taken themselves or not, are required to use the photographs in accordance with the specifications in this policy.

## THE USE OF CCTV

- We operate a set of recording CCTV cameras to support student, staff and site security. Signs are posted at prominent positions around the site informing visitors, staff and students of the use of the CCTV facilities.
- Objectives of the scheme are the support and assistance in:
  - Ensuring personal safety of visitors, students and staff

- Protecting the school site, buildings and resources
- Deterring crime,
- Identifying, apprehending and prosecuting offenders in liaison with the Police as necessary
- Cameras are placed internally in selected corridors and externally to monitor doors to buildings, access pathways around the site and open areas.
- The planning and design of the system has endeavoured to ensure that the scheme will give maximum effectiveness while ensuring reasonable privacy. .
- Recordings are kept securely for 14 days and accessed by a few identified and trained staff.
- The system operates continuously, 24 hours every day.

## 6. Evaluation & Review

The implementation of this policy will be monitored by the Head Teacher, by the Senior Leadership Team and by the Governing Body.

The implementation of this policy will be reviewed, and its impact monitored, in accordance with the Governing Body's programme for Policy Review - refer to CPS-NS-X-PRO-002 Document Review Procedure.

Uncontrolled when printed