



# Security Policy

## 2024-25

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Policy Contact: Mr Greg Burt, Director of Estates & Operations

### **Statement of Security Policy**

This policy ensures that plans and procedures at Seaford College enable the school to meet the standards of individual and collective personal security that are required by regulation, in particular the Health and Safety at Work Act 1974 et seq, the Management of Health and Safety at Work Regulations 1999, the Minimum Boarding Standards Regulations and the Regulatory Requirements of Independent Schools, as published from time to time by the Independent Schools Inspectorate. The Quality of Pastoral Care, and the Welfare, Health and Safety of students is affected by the security posture and attitudes within the school of both staff and pupils, as well as by physical features such as locks and lighting.

### **Communication**

This policy is communicated to all staff and available to all on the school's Firefly portal. Security is included as a subject to be covered by the Health and Safety Committee, and Security will be included as a standing agenda item at the termly Health and Safety Committee Meetings.

### **Statement**

The Governors of Seaford College recognise that just as the school has a duty to maintain the health and safety of staff, students, parents, and visitors, they have an equal duty to maintain their personal security. Seaford College is a partially open site with public footpaths and a public bridleway across the site, but only those who have business at the school are entitled to be within the grounds but off these rights of way. Vehicular access is physically prohibited at times by locking of gates. Buildings will be kept locked when they are unmanned. No students will be in any buildings without staff present. Students are always under some form of supervision; direct in most instances inside curriculum time, but loose supervision is the norm at other times. No visitor or contractor may remain unescorted unless they have been signed in Reception and a member of staff has taken personal responsibility for their actions whilst on school grounds.

### **Statement of Boarding Security**

The Boarding Houses maintain their integrity by being accessible only by those who have right of access and are in possession of the appropriate digital lock codes. No one else is permitted within the boarding areas unless they are escorted by an appropriate member of staff.

### **Funding**

The Governing Body will ensure that funding is made available when security issues that are brought before them are deemed by them to warrant suitable expenditure.

### **Reporting**

Security issues will be included in health and safety reports to the Governing Body.

### **Premises**

The College buildings are patrolled each evening to ensure all are secure and in safe condition.

## **Duties of Staff**

### **The Headmaster**

The Headmaster is ultimately responsible for the implementation and operation of the Security Policy. He will:

- Ensure that all staff appreciate the importance of security, and understand the Policy Statements above. He will ensure that the Senior Management Team's deliberations on the routines and procedures that are to be followed in the school are appropriately promulgated and maintained
- Ensure that all staff accept their own responsibility
- Ensure that staff are made available for appropriate security training
- Ensure that parents are aware of the security posture of the school and that they are encouraged to play their part in its maintenance
- Ensure that advice and co-operation is obtained from the police
- Ensure that there is a procedure for contacting the police routinely, and in an emergency, and that staff are aware of it
- Ensure that there is a security incident reporting procedure within the school to him, and that all crimes are reported to the police and an appropriate crime number is obtained
- Ensure that the Health and Safety Committee review reported incidents so that any trends may be spotted and acted upon.

### **The Director of Estates & Operations (DoE&O)**

The DoE&O will:

- Review the security risk assessment annually
- Ensure that there are periodic security inspections of the school. These may be combined with health and safety inspections
- Ensure changes in security are reported to the school's insurance brokers, and seek advice from them should any sizeable investment in security be considered
- Ensure that security is considered as a part of the overall risk management strategy of the school
- Ensure that security forms part of the induction of all new staff
- Ensure that all parties using school premises or facilities are aware of the policy and what is required of them.
- Regularly review and update the staff access permissions

### **Staff, students and parents**

As part of the school's security posture it must be recognised that good security involves everyone. This includes awareness of whether something feels wrong, and reporting suspicions accordingly, challenging unknown persons in the grounds as to their business, and reporting instances of physical breaches of security, such as gates being unlocked when they should be locked, and doors left open. Security also includes the safeguarding of information that should remain confidential to the school.

### **Day to Day Security Posture**

The school routines that have been developed by the Senior Management Team and that are used throughout the school have been designed to maintain a suitable security posture at all times be it in the school day, out of school hours, or in the holidays. They take account of the Security Risk Assessment and are reviewed as the Senior Management Team deems necessary. They take account of the physical features of the school, the staff/pupil ratio, and the programmes for each Year group, and climatic and seasonal factors. Security features as a standing agenda item at the

Health and Safety Committee meetings, and any member of staff may ask their representative at this Committee to raise their concerns if necessary.

### **CCTV (including ANPR)**

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) and Automatic Number Plate Recognition (ANPR) Systems at Seaford College (the school). It also serves as a notice and a guide to data subjects (including students, parents, staff, volunteers, visitors to the school and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the school, who act as the Data Controller. This policy will be subject to regular review and should be read with reference to the School's Data Protection Policy.

All fixed cameras are in plain sight on the school premises, the school does not routinely use CCTV for covert monitoring or monitoring of private property outside the school grounds.

CCTV is generally used across the school including main access points areas of boarding accommodation, common rooms, classroom buildings and key external areas:

1. Main Entrance
2. Mansion Boarding
3. Mansion Basement
4. Mansion Reception
5. Hollington
6. Humphrey Avon Centre
7. Maths & Science Block
8. Pavilion
9. Music Block
10. Heden Hall & Court Boarding
11. Walled Garden Boarding
12. Yr 9/10 Common Room
13. Estates & Operations Barn/Offices
14. Prep School
15. Art, Design & Technology
16. Humanities & BTec Classrooms
17. The Johnson Centre inc car park
18. Springfield Performance Centre
19. Duncton, Graffham and Beechwood Lane gate entrances (inc ANPR)

The school's purpose of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the school believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

## **1. Objectives of the System**

- 1.1 To protect students, staff, volunteers, visitors and members of the public with regard to their personal safety.
- 1.2 To protect the school buildings and equipment, and the personal property of students, staff, volunteers, visitors and members of the public.
- 1.3 To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of the school site and deliveries and arrivals, [including car parking] [and number plate recognition].
- 1.5 To monitor staff and contractors when carrying out work duties.
- 1.6 [To monitor and uphold discipline among pupils in line with the [School Rules], which are available to parents and pupils on request.]

## **2. Positioning**

- 2.1 Locations have been selected, both inside and out, that the school reasonably believes require monitoring to address the stated objectives.
- 2.2 Adequate signage has been placed in prominent positions to inform staff and students that they are entering a monitored area, identifying the school as the Data Controller and giving contact details for further information regarding the system.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances.

## **3. Maintenance**

- 3.1 The CCTV System will be operational 24 hours a day.
- 3.2 The System Manager will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.
- 3.3 The system will be checked and (to the extent necessary) serviced no less than annually.

## **4. Supervision of the System**

- 4.1 Staff authorised by the school to conduct routine supervision of the system will include the Headmaster, Senior Deputy Head and Director of Estates & Operations. Staff authorised to access CCTV within their areas of responsibility will include Assistant Heads, Heads of Years, SLT Directors and senior Houseparents (list below).
- 4.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

## **5. Storage of Data**

- 5.1 The day-to-day management of images will be the responsibility of Director of Estates & Operations who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- 5.2 Images will be stored for a period of up to 6 months and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded.

## **6. Access to Images**

- 6.1 Access to stored CCTV images will only be given to authorised persons, under the authorisation of the Headmaster and supervision of the Director of Estates & Operations, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 6.2 Access to the CCTV network is graded across three tiers:
  - Tier 1: Headmaster, Senior Deputy Head, Director of Estates & Operations – access to CCTV network across the College estate.
  - Tier 2: Deputy Heads, Directors of Middle School and Director of Girls Provision – access to appropriate Common Room areas, locker areas and teaching blocks
  - Tier 3: Heads of Year – access to their Common Room, Houseparents – access to their House.
- 6.3 In the event of an investigation using CCTV, any interrogation of the CCTV system will be logged. The date, time and reason for interrogating the CCTV system will be recorded, along with the day, date and time of the interrogation itself.
- 6.4 CCTV footage will not be released or viewed by anyone outside of the three tiers listed above, except with permission of the Headmaster, Deputy Head or Director of Estates & Operations (for example an Assistant Head of Year may need to watch footage in the absence of a Head of Year).
  - 6.4.1 Where required to do so by the Headmaster, the Police or some relevant statutory authority;
  - 6.4.2 To make a report regarding suspected criminal behaviour;
  - 6.4.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern.
  - 6.4.4 To assist the school in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardian will be informed as part of the school's management of a particular incident;
  - 6.4.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;
  - 6.4.6 To the school's insurance company where required in order to pursue a claim for

damage done to insured property; or

## **7. Other CCTV systems**

- 7.1 The school does not own or manage third party CCTV systems but may be provided by third parties with images of incidents where this in line with the objectives of the school's own CCTV policy and/or its [School Rules].
- 7.2 Many students travel to school on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The school may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the school's management of a particular incident.

## **8. Complaints and queries**

- 8.1 Any complaints or queries in relation to the school's CCTV system, or its use of CCTV, or requests for copies, should be referred to the system manager [Director of Estates & Operations].
- 8.2 For any other queries concerning the use of your personal data by the school, please refer to the school's GDPR Policy.

## **9. Estates Access**

The College has identified areas of the estate that have been assessed as unsafe for student access or where access is permitted under supervision of staff.

Areas of no access:

1. Botany Bay and lake adjacent to the main entrance (unless on Friday supervised Seaford Fishing Club)
2. The Spinney woods north of main school
3. Estates Grounds & Maintenance compound adj. to Wilberforce & ADT
4. Any vacant properties across the College estate
5. The grounds immediately to the rear of Walled Garden Boarding Houses
6. The hill and woods to the south of the college (further than first RoW track)
7. Beechwood Lane
8. Any paddock land owned by the College or adjoining Lavington Stud Farm

Areas of supervised access:

1. Golf course and driving range
2. All sports pitches and facilities
3. Woods to north of golf course
4. Woods and hill to South Downs Way if on field trip or DoE managed exercise
5. Clay Range

## 9.1 Site Access and Controls

The school has five points of vehicular access which are controlled as follows:

Main entrance - security gate controlled via time clock, vehicle approach loom, gate fobs and ANPR systems.

West Gate – ANPR system, authorised persons only

Beechwood Lane – padlocked, authorised key holders only

Norwood Lane North & South - padlocked, authorised key holders only

Persons registered into the ANPR system will include, site resident staff for out of hours access, authorised staff and parents permitted to use the West gate/drive, residents of Wallace Square (main entrance default, west gate under licence), teachers of Duncton & Graffham Schools, staff and residents of Lavington Stud, postal and emergency services. A list of all persons holding gate fobs or registered on the ANPR system is maintained and regularly updated.

Access along the school's private road and through the west gate is strictly managed to mitigate the amount of traffic the school passes through Graffham and local villages, this is in conjunction and request from local parish council and Graffham Primary & Nursery School to reduce the impact of traffic through the village. It also permits tighter control of the schools safeguarding measures and practices. General issue for parents of pupils to have access onto the estate via the Graffham gate is not generally permitted, concession to this is for pastoral needs should a pupil have a medical condition that would require the parent to access the school estate urgently to attend the child or should the parent reside on the south side of Graffham.

## 9.2 Emergency Services

To facilitate out of hours access for the emergency services a key code panel is installed and maintained at both the main entrance at Duncton and the west entrance at Graffham. The code to access these gates is issued to both central Fire Services overseeing Petworth and Midhurst Fire Stations together with SECAMB who operate West Sussex Ambulance Service. Access arrangements are supported by the school having site staff residents residing at lodges at both entrance gates.





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|---|---------------------------------|---------------------------------------|
| 1. Mansion                                | 11. Staff Room                  | 22. Sports Hall                       |
| 2. Chapel                                 | 12. SMT Offices                 | 22a. Johnson Centre                   |
| 3. Swimming Pool                          | 13. Languages                   | 22b. Springfield Performance Centre   |
| 4. Walled Garden Boarding Houses          | 14. Maths & Science             | 23. Creative Arts & Design Technology |
| 5. Medical Block                          | 15. No.46                       | 24. Estates & Operations              |
| 6. Year 11 Common Room                    | 16. Maths, Science & Computing  | 25. Combined Cadet Force              |
| 7. 6 <sup>th</sup> Form Centre            | 17. Music                       | 26. Humanities & Prep Dining          |
| 8. Humphrey Avon Centre - English & Media | 18. Yr9 & Yr10 Common Rooms     | 27. Cricket Pavilion                  |
| 9. Humphrey Avon Centre - English         | 19. Heden Hall Boarding         | 28. Charles Johnson Pavilion          |
| 10. Learning Support                      | 20. Heden Court Boarding        |                                       |
| 10a. Economics                            | 21. Prep School & Prep Boarding |                                       |

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|------------------------------------|----------------------------|
| General Teaching / Boarding Houses | Staff Parking              |
| Ancillary / Staff Accommodation    | Visitor Parking            |
| Other                              | Student Drop Off / Pick Up |
| Fire Assembly Point                | Sixth Form Parking         |
| College Boundary                   | School Minibus Parking     |

