

Trinity Academy Trust

Closed Circuit Television (CCTV) Policy

Approved by the Board of Trustees– July 2025

Next Review Date – July 2028

Review

Formal Review Cycle	3 years		
Latest Formal Review (date)		Next Formal Review Due (date)	July 2028
Policy Owner	Premises Health & Safety		
Policy Author	June Renwick		

Approvals

Board Y/N		Committee		Date Board approved	
ELT Y/N		ELT date approved		Additional committee	

Publication

Website Y/N	Y	Intranet Y/N			Other	
-------------	---	--------------	--	--	-------	--

Change History

Version	Date Reviewed/ Revised	Description of Change	Reviewed by	Approved by
1	July 2025	New Policy	JR	Finance Audit & Resource
2				

TANMAT Closed Circuit Television (C.C.T.V.) Policy

1. Policy Statement

1.1. Introduction

Trinity Academy Newcastle (TANMAT) has deployed a combination of internal and external CCTV surveillance cameras across a number of its sites to assist in the safeguarding of staff, learners and visitors and the ongoing security of its real estate. Although not all systems are continually monitored, any recorded images are securely stored (Max of 28 days) and are available for viewing retrospectively should the need arise, and the required authorisation be provided.

TANMAT believes surveillance systems have a legitimate role to play in helping to promote and maintain a safe and secure environment, however, TANMAT recognises that this may raise concerns about the effect on individuals and their privacy. This policy is intended to outline how the employed CCTV systems will be utilised to address these concerns whilst creating the correct conditions in which staff can operate and learners can study.

1.2. Purpose

This Policy has been prepared to comply with the standards set out in the “Surveillance Camera Code of Practice 2013” and the Information Commissioner’s Office “In the picture: A data protection code of practice for surveillance cameras and personal information 2017”. Its purpose is to ensure the TANMAT CCTV systems are used to create a safer environment for staff, learners, and visitors and to ensure its operation is consistent with the Data Protection Act 2018.

Specifically, within TANMAT CCTV systems will be employed to:

- Protect the health, safety and welfare of staff, learners and visitors attending any site equipped with CCTV.
- Monitor the security of the sites and property contained within.
- Protect staff, learners and visitors from harassment or intimidation.
- Assist in the maintenance of good order.
- Assist in the prevention, investigation, and detection of disciplinary offences in accordance with TANMAT disciplinary procedures.
- Help identify individuals who breach TANMAT policies.
- Support the Police in deterring and detecting crime.

2. Scope

This policy applies to CCTV operated for the purposes of promoting safeguarding, security and to identify criminal activity whether occurring, anticipated or perceived in order to enhance the safety and wellbeing of staff, learners, and visitors. It also applies to information relating to individuals for the purposes of monitoring activities on TANMAT premises, car parks and other public areas.

The use of conventional cameras, surveillance cameras and CCTV for other purposes including for artistic, administrative, educational or research purposes is not covered by this policy.

3. Aims of the Policy/Underpinning Principles

The “Guiding Principles” outlined in the Home Office “12” point code of conduct will be adopted in the use and application of TANMAT’s surveillance camera systems. These will:

1. Ensure the use of the system is always employed for a specified legitimate aim and capable of meeting an identified pressing need.
2. Consider the effect on individuals and their privacy.
3. Provide as much transparency in the use of the system as possible, providing contact details for information and complaints.
4. Detail clear responsibility and accountability for all surveillance activities including images and information collected, held, and used.
5. Provide clear rules, policies, and procedures, ensuring they are communicated to all who need to comply.
6. Ensure no more images or information is stored than that which is strictly required.
7. Restrict access to recorded/retained images and information with clear rules defining who can gain access.
8. Consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Ensure images will be subject to appropriate security measures to safeguard against unauthorised access and use.
10. Provide effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with.
11. Ensure the use of the system in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value, when used in the pursuit of a legitimate aim.
12. Ensure that when any information is used to support a surveillance camera system and comparisons are made against a reference database, information should be checked and verified for accuracy.

4. Responsibilities

4.1. The Head of Corporate Governance and Policy

- Ensure TANMAT is registered with the Information Commissioner's Office
- Ensure subject access requests and Freedom of Information requests are responded to in a manner consistent with TANMAT policy and procedure and legislation

4.2. Trust Premises & Health & Safety Lead

- Ensure the installation and operation of the CCTV system complies with the “Surveillance Camera Code of Practice 2013”.
- Ensure the operation and use of CCTV equipment and the recording and viewing of images complies with the “Data Protection Act 2018”.
- Ensure the system is maintained and repaired when necessary.
- Ensure staff operating the system are trained and equipped with the correct qualifications.
- Act as the first point of contact for any complaints received regarding the operation of the system.
- Ensure any images retained for evidential purposes are kept in a secure location where access is controlled.

4.3. Premises & SLT

- Operate and monitor the camera surveillance systems located at TANMAT sites.
- Will provide an immediate response to incidents observed where a “risk” is perceived.
- Ensure no unauthorised access to the system is allowed at any time. Normal access is strictly limited to authorised staff only.
- When in the receipt of authorisation to provide information, will only provide that which is relevant to the enquiry.
- Will in the event of an “emergency” and where it is not reasonably practicable to secure prior authorisation, may provide access to persons with a legitimate reason to access the CCTV system.
- Before allowing any person access to the CCTV system must satisfy themselves of the identity of any visitor and ensure that the visitor has the appropriate authorisation.
- Ensure all visitors complete and sign the Visitors Log, which shall include their name, department or the organisation they represent, the person who granted authorisation for their visit (if applicable) and the start and finish times of their access to the CCTV system.
- Will highlight any system failures to Premises as soon as reasonably practicable.

4.4. Marketing Team

- Will ensure the CCTV policy is maintained and is easily accessible via the TANMAT Trust websites.

5. Implementation

5.1. Explanation of Key Terms

- **Surveillance system** - Any electronic system or device that captures images of individuals or information relating to individuals.

- **CCTV** - Any surveillance system designed to capture and record images of individuals or information relating to individuals and/or property. The term includes CCTV as understood as a system of fixed cameras but also covers any such technology, and any other systems that capture personal data.
- **System Operator** – Person or persons that take the decision to deploy a surveillance camera system, and are responsible for defining its purpose, and / or are responsible for the control of the use or processing of images or other information obtained by virtue of such system.
- **System User** – person or persons who may be employed or contracted by the systems operator who have access to live or recorded images or other information obtained by virtue of such system.
- **Data Subjects** – Persons whose images have been recorded by the CCTV systems.
- **Emergency** – A serious, unexpected, and often dangerous situation requiring immediate action.

6. Operation

6.1. Overview of TANMAT CCTV Systems

- CCTV systems are installed within the following locations:
 - Trinity Academy Newcastle Upper Site and grounds
 - Sanctuary provision
 - Trinity Academy Lower Site and grounds
 - Trinity Solutions Academy
 - Trinity Academy Newbridge and grounds
 - Acorn House
- The CCTV systems are owned by TANMAT and include a combination of fixed cameras
- The CCTV systems will only be used in a manner which is fair to everyone and in accordance with the requirements of TANMAT's disciplinary procedures.
- CCTV signs will be prominently placed at strategic points and at entrance and exit points of the campus to inform staff, learners, visitors and members of the public that CCTV is in use.
- Fixed cameras will be configured to record images only
- Remote access to cameras will only be employed sparingly and in exceptional circumstances.
- Where maintenance is required, staff in charge of the CCTV systems must be satisfied as to the identity of contractors prior to allowing access to the system.

- Although every effort has been made in the planning and design of the CCTV systems to provide maximum effectiveness, it is not possible to guarantee that the systems will detect every incident taking place within the area of coverage.

6.2. Monitoring and Recording

- TANMAT will be responsible for the management and processing of images.
- Authorised staff shall monitor live feeds from CCTV cameras where it is deemed reasonably necessary, for example to protect health and safety.

6.3. Compliance with Data Protection

- It is recognised that the images obtained comprise personal data and are subject to the law on Data Protection. All copies will be handled in accordance with TANMAT procedures.
- All staff involved in the operation of the camera surveillance system will, by training and access to this policy, be made aware of the sensitivity of handling CCTV images and recordings.
- Camera surveillance systems will be stored within secure locations and/or accessed by secure passwords. Unauthorised access to the CCTV screens will not be permitted at any time.

6.4. Disclosure of Images – See Appendix ‘A’

Access to stored CCTV images will only be provided following approval by the relevant trust authority. Requests will generally be received from an individual (staff, student, visitor, contractor or member of the public), third parties (police or other legal body) or by staff in relation to an academy related incident.

6.4.1. Individual Access Rights

Any individual whose personal data is held by TANMAT in the form of a CCTV recording can request access to that recording. TANMAT will respond in accordance with the Data Protection Act 2018.

Any person who wishes to access images must make their request in writing to the Governance Professional, attaching a completed Access Request Form. This form is included as appendix ‘B’.

6.4.2. Access to Images by Third Parties external to the trust

Records may need to be disclosed to third parties for the following reasons:

- a. To the police, for the prevention and detection of crime.
- b. To a court for legal proceedings.
- c. To a solicitor for legal proceedings.
- d. To the media for the purpose of identification.

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and the prevailing data protection legislation.

All third parties requesting access to images must make their request in writing to the Governance Professional, attaching a completed Access Request Form. This form is included as appendix 'B'.

6.4.3. Access to Images by a member of trust staff

Staff members may request access to CCTV images for several reasons which includes:

- Investigation of an internal incident within the trust e.g. theft.
- In support of a disciplinary investigation.
- To assist with health and safety related incidents.

Any staff member who wishes to access images must obtain authorisation from a Senior Manager (see below) by submitting a completed Access Request Form as included within appendix 'B'.

Authorisation to view can only be granted by:

- Chief Executive Officer
- Director of School Improvement
- Head of School (Business)

Once authorization to view is given, Trust Premises, Health & Safety Lead will facilitate this.

6.5. Record-keeping of date transferred, or images viewed

Where data/images have been disclosed, viewed or transferred to a portable storage device TANMAT will retain a record as detailed in Appendix 'C' and will include:

- The date and time of removal.
- The name of the person removing the images.
- The name(s) of the person(s) viewing / or in receipt of the images.
- The reason for the request.
- The outcome, if any, of the viewing (if applicable).
- The date and time the images were returned to the system or secure place, or if they have been retained for evidential purposes (if applicable).
- Where access to data/images is refused, the reason(s) shall be documented and made available to the party requesting access.

6.6. Retention of Images

- Images will normally be retained for 28 days, after which time they will be overwritten and any copies destroyed unless required as evidence in Police, internal disciplinary or civil proceedings.
- Data and images recorded by the CCTV system shall be permanently and securely deleted once the purpose for which they were collected has expired.
- Any physical matter such as tapes, discs, hard copy prints, still photographs shall be disposed of as confidential waste.

7. Associated Documents

Legislation considered and applicable to the TANMAT CCTV policy includes:

- Health and Safety at Work Act etc. 1974.
- Data Protection Act 2018.
- Human Rights Act 1998.
- The Regulation of Investigatory Powers Act 2000.
- The Private Security Industry Act 2001.

Standards considered and applicable to the TANMAT CCTV policy includes:

- Information Commissioners - In the picture: A data protection code of practice for surveillance cameras and personal information.
- Surveillance Code of Practice 2013 (Home Office).

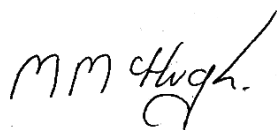
8. Policy Monitoring and Review

The policy shall be reviewed every three years, or as required, for example following amendments to applicable legislation.

9. Equality Impact Assessment

Have you sought consultation on this policy? Details:		Consultation occurred with: Trust Premises Health & Safety Lead CEO Director of School Improvement Finance Audit and Resource Committee		
Could a particular group be affected (negatively or positively)?	Impact Y/N	Description of Impact	Evidence	Mitigation/Justification
Protected characteristics under the Equality Act 2010				
Age	N			
Disability	N			
Gender Reassignment	N			
Marriage and Civil Partnership	N			
Pregnancy and maternity	N			
Race	N			
Religion or belief	N			
Sex	N			
Sexual Orientation	N			
Additional characteristics to consider				
Young Persons in Care & Care Leavers	N			
Young Carers & Care Givers	N			
Young Parents	N			
Youth Offenders	N			
Those Receiving Free School Meals	N			
If there is no impact, please explain:	The Policy is aimed to safeguard and protect 'all' staff and learners.			

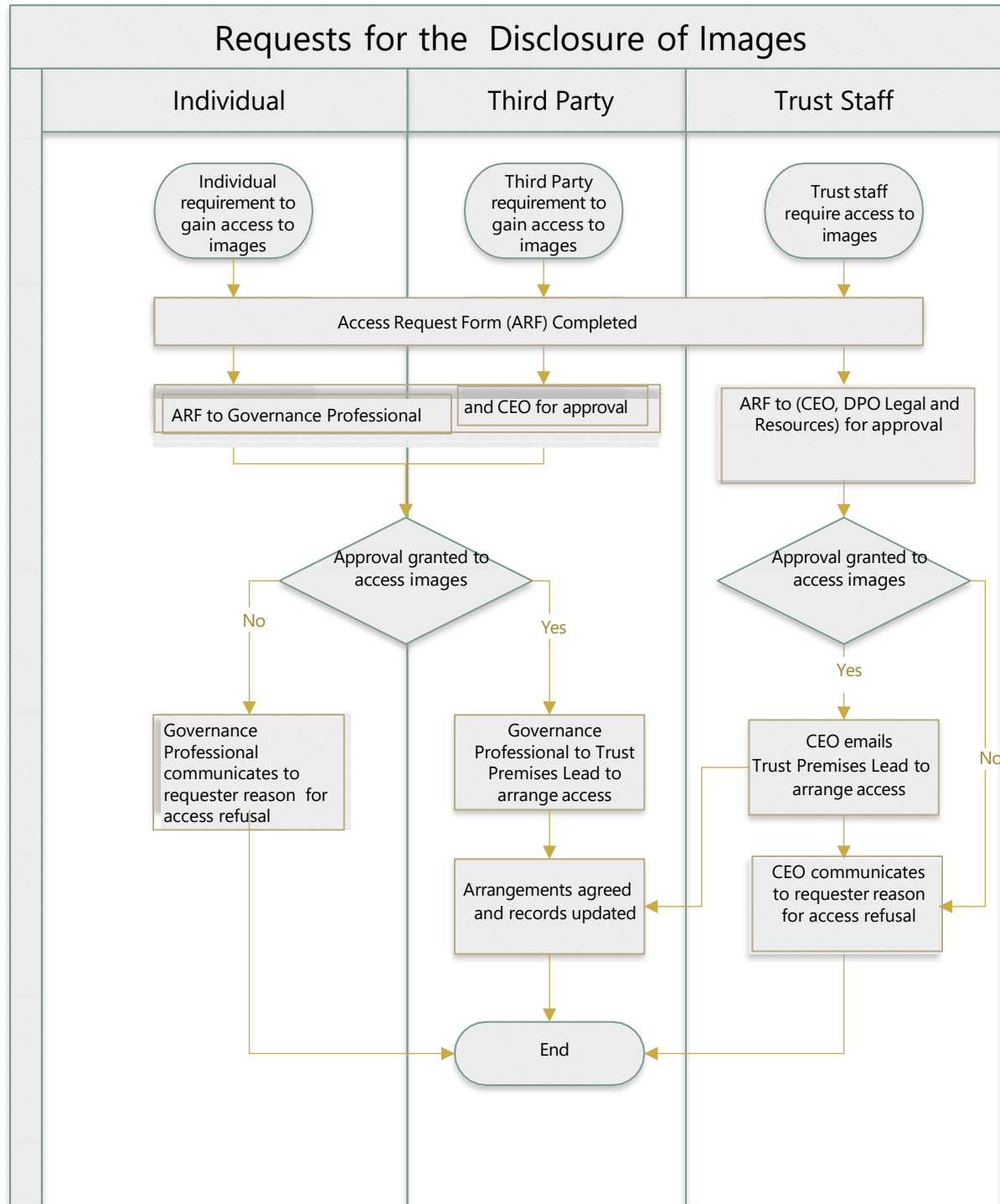
Signed on behalf of the Board:



Michael McHugh (Chairperson of the Board)

Date: July 2025

Appendix 'A' – Disclosure of images



Appendix 'B' – Access Request Form

(Please use BLOCK CAPITALS to complete this form)

1. Details of Requester

Title.	First Name.	Surname
Organisation (where applicable)		
Address of Individual / Organisation		
Telephone No.		
Email address.		
Are you requesting images of yourself?	Yes	No
If not requesting images of yourself, please provide the reason for application and the authority to view these images.		

2. Information Required to Locate Images

Date	Time
Location(s) and Individual(s) Involved	

3. Access to Images

I would like to view the relevant images at the Trust	
I would like to be sent a copy of the relevant images	

I acknowledge that it may be necessary for TANMAT to contact me to obtain further information to confirm my identity and / or requirements.

Name	Signature	Date
------	-----------	------

Appendix 'C' – Record of Images viewed or transferred to a portable storage device.

(Please use BLOCK CAPITALS to complete this form)

Date & Time	Name of Person removing images	Name of Person viewing / receiving the images (if applicable)	Reason	Outcome of viewing (if applicable)	Date & Time images returned if removed for evidential images (if applicable)