



# CCTV Policy

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The Sovereign Trust is a Multi Academy Trust registered in England No. 09666511. Registered Office: Manor Academy Sale, Manor Avenue, Sale M33 5JX




## Document Control

<b>Title</b>	CCTV Policy
<b>Supersedes</b>	3.1
<b>Owner</b>	CEO
<b>Circulation/Distribution</b>	All
<b>Review Period</b>	Annually

*The Sovereign Trust is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with Trust's policy review schedule.*

*A current version of this document is available to all interested parties [The Sovereign Trust Website](#)*

Signature: 

Date: 23/09/2024

## Version History

<b>Next Review Date</b>		23/09/2025		
<b>Version</b>	<b>Date</b>	<b>Amendments</b>	<b>Author</b>	<b>Status</b>
1.0	06/05/2018	Initial Issue	CEO	Approved
2.0	19/08/2021	Changes made in regard to CCTV in sensitive areas, sharing with third parties, retention and security practices around portable media devices.	CEO	Approved
3.0	03/08/2022	Formatting amendments	CEO	Approved
3.1	28/11/2023	Added appendices to show locations of CCTV cameras at Academies	CEO	Approved
4.0	23/09/2024	Included additional information on CCTV in bathrooms	CEO	Approved

The Sovereign Trust ("Trust") recognises that CCTV systems can be intrusive in terms of privacy.

For this reason, the Trust has carried out a data protection impact assessment to evaluate whether the CCTV system is necessary and proportionate to achieving the legitimate objectives set out below.

The data protection impact assessment result has informed the Trust's use of CCTV and the contents of this policy.

## Objectives

This policy shall be reviewed regularly, and whenever new equipment is introduced, a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.

The purpose of the CCTV system is to assist the school in reaching the following objectives:

- To protect pupils, staff, and visitors against harm to their person and/or property;
- To increase a sense of personal safety and reduce the fear of crime;
- To protect the school buildings and assets;
- To support the police in preventing and detecting crime;
- To assist in identifying, apprehending, and prosecuting offenders;
- To assist in establishing the cause of accidents and other adverse incidents and prevent reoccurrence; and
- To assist in managing the school.

## Purpose of This Policy

The purpose of this policy is to regulate the management, operation, and use of the CCTV system (closed circuit television) at the school. The CCTV system used by the school comprises of:

CCTV cameras are not installed in areas where individuals would have an expectation of privacy, such as toilets, changing facilities, etc.

## Statement of Intent

CCTV cameras are installed so that they are not hidden from view. Signs are predominantly displayed where relevant so that staff, students, visitors, and members of the public are made aware that they are entering an area covered by CCTV. The signs also contain contact details and a statement of the purposes for which CCTV is used.

The CCTV system will seek to comply with the requirements of both the Data Protection Act and the most recent Commissioner's Code of Practice.

The Trust will treat the system, all information, documents, and recordings (both obtained and subsequently used) as data protected under the Act.

The system has been designed to prevent the observation of adjacent private homes, gardens, and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Images will only be released to the media with the written authority of the police for use in the investigation of a specific crime. They will never be released to the media for purposes of entertainment.

The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner, will be clearly visible on the site and clearly indicate who is responsible for the equipment.

Where wireless communication takes place between cameras and a receiver, signals shall be encrypted to prevent interception.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. After 30 days, the system automatically overwrites data storage.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

## System Management

Access to the CCTV system and data shall be password-protected and will be kept in a secure area.

The CCTV system will be administered and managed by the Chief Information Officer, who will act as System Manager and take responsibility for restricting access in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager, the system will be managed by the IT Assistant.

The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate senior leadership team members as determined by the Executive Headteacher/Head of Schools/CEO.

The CCTV system is designed to operate 24 hours a day, every day of the year, though the school does not guarantee that it will work during these hours.

The System Manager will regularly check and confirm the system's efficiency, particularly that the equipment is properly recording and that the cameras are functional.

Cameras have been selected and positioned to best achieve the objectives set out in this policy, particularly by providing clear, usable images.

Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

Where a person other than those mentioned above requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of the purpose of any person making such request. Where any doubt exists, access will be refused.

Details of all visits and visitors will be recorded in a system log book, including time/data of access, details of images viewed, and the purpose for doing so.

## Downloading Captured Data onto Other Media

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings), any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures: -

- a) A unique mark must be used to identify each downloaded media.
- b) Before use, each downloaded media must be cleaned of any previous recording.
- c) The System Manager will register the date and time of downloaded media insertion, including its reference.
- d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date, providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
- e) If downloaded media is archived, the reference must be noted.
- f) If downloaded media is put onto a device, the device will be encrypted and password protected.

Images may be viewed by the police for the prevention and detection of crime, as well as by the Systems Manager, his/her replacement, the Executive Headteacher/Head of Schools/CEO, and other authorised senior leaders. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable, if possible, for that person to withhold viewing of the data until asked to do so by the police.

A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.

Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school and downloaded media (and any images contained thereon) are to be treated in accordance with Data Protection legislation. The school also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of downloaded media, this will be produced from the secure evidence store and completed in its sealed bag.

The police may require the school to retain the downloaded media for possible future use as evidence. Such downloaded media will be properly indexed and securely stored until needed by the police.

Applications received from outside bodies (e.g., solicitors or parents) to view or release images will be referred to the school's Data Protection Officer, and a decision will be made by a senior leader of the school in consultation with the school's Data Protection Officer.

## Complaints About the Use of CCTV

Any complaints in relation to the Trust's CCTV system should be addressed to the Executive Headteacher/Head of Schools.

## Requests for Access by the Data Subject

The Data Protection Act provides data subjects – those whose image has been captured by the CCTV system and can be identified - with a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Chief Information Officer.

## Public Information

Copies of this policy will be available to the public from the school office.

## Appendix 1 – Manor Academy

Camera Type	Location	Sound	Recording Capacity	Swivel/Fixed
IP Dome Camera with Intake Box  Internal	Facing Server Room	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Trust Office Door – ICT Room and English department entrance	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	English Corridor – 1 <sup>st</sup> Floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Facing Behaviour Support – Food Tech room and Equal KS3 room – 1 <sup>st</sup> floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Long corridor – outside behaviour support – 1 <sup>st</sup> floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Top of stairs facing science corridor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Top of stairs facing behaviour support door	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Long corridor corner facing Maths department and ASC door	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Science photocopier room	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	ASC top corridor facing food tech room and Equals KS4	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	ASC Stairs – 1 <sup>st</sup> floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	English department stairs – 1 <sup>st</sup> floor and lift	No	Yes	Fixed

IP Dome Camera with Intake Box Internal	Sports hall corridor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Crush hall corner	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Crush hall central facing stairs	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Reception indoor facing student entrance	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	College side entrance corridor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	College main entrance corridor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Student entrance outside catering	No	Yes	Fixed
IP Dome Camera with Intake Box External	Visitor entrance outside walk-up	No	Yes	Fixed
IP Dome Camera with Intake Box External	Main-body playground	No	Yes	Fixed
IP Dome Camera with Intake Box External	College playground	No	Yes	Fixed
IP Dome Camera with Intake Box External	Carpark facing bins	No	Yes	Fixed
IP Dome Camera with Intake Box External	College access road	No	Yes	Fixed

IP Dome Camera with Intake Box External	Main-body playground far side.	No	Yes	Fixed
IP Dome Camera with Intake Box External	Sheds and greenhouse	No	Yes	Fixed
IP Dome Camera with Intake Box	ASC lower entrance door	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Student toilets corridor – ground floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Staff toilets corridor – ground floor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Staff corridor facing office and small meeting room	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Head teachers' entrance	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	Main entrance indoor	No	Yes	Fixed
IP Dome Camera with Intake Box External	Front visitor carpark	No	Yes	Fixed
IP Dome Camera with Intake Box External	ASC playground	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	ASC downstairs corridor	No	Yes	Fixed
IP Dome Camera with Intake Box Internal	ASC office corridor	No	Yes	Fixed
IP Dome Camera with Intake Box External	ASC playground side	No	Yes	Fixed

IP Dome Camera with Intake Box Internal	Canteen	No	Yes	Fixed
IP Dome Camera with Intake Box External	Portacabin entrance	No	Yes	Fixed
IP Dome Camera with Intake Box External	Outside sportshall facing road	No	Yes	Fixed
IP Dome Camera with Intake Box External	Outside sportshall facing stairs	No	Yes	Fixed
IP Dome Camera with Intake Box External	Top of stairs facing behaviour support doo	No	Yes	Fixed
IP Dome Camera with Intake Box External	Long corridor corner facing Maths department and ASC door	No	Yes	Fixed
IP Dome Camera with Intake Box External	Science Photocopier Room	No	Yes	Fixed
IP Dome Camera with Intake Box External	ASC top corridor facing food tech room and equals KS4	No	Yes	Fixed
IP Dome Camera with Intake Box External	English Department stairs – 1 <sup>st</sup> floor	No	Yes	Fixed
IP Dome Camera with Intake Box External	Sports hall corridor	No	Yes	Fixed
IP Dome Camera with Intake Box External	Crush hall corner	No	Yes	Fixed
IP Dome Camera with Intake Box External	Crush hall central facing stair	No	Yes	Fixed
IP Dome Camera with Intake Box External	Reception indoors facing the student entrance	No	Yes	Fixed
IP Dome Camera with Intake Box External	College side entrance corridor	No	Yes	Fixed

IP Dome Camera with Intake Box External	College main entrance corridor	No	Yes	Fixed
IP Dome Camera with Intake Box External	Student's entrance outside the catering	No	Yes	Fixed

## Appendix 1 – New Park Academy

Camera Number	Camera Type	Location	Sound	Recording Capacity	Swivel/Fixed
1	360deg zoomable fisheye	Canteen	No	Yes	Fixed
2	IP Dome Camera with Intake Box External	Internal outside canteen door	No	Yes	Fixed
3	IP Dome Camera with Intake Box External	Corridor – outside LC/DS Classroom (60)	No	Yes	Fixed
4	IP Dome Camera with Intake Box External	LC/DS Room (60) – canteen door	No	Yes	Fixed
5	IP Dome Camera with Intake Box External	SEN room -Staff room	No	Yes	Fixed
6	IP Dome Camera with Intake Box External	Above SEN - Canteen	No	Yes	Fixed
7	IP Dome Camera with Intake Box External	Above D+T - ICT	No	Yes	Fixed
8	IP Dome Camera with Intake Box External	Above Common Room - Staff Room	No	Yes	Fixed
9	IP Dome Camera with Intake Box External	Inside SEN Main Room	No	Yes	Fixed

10	IP Dome Camera with Intake Box External	Inside SEN Back Office	No	Yes	Fixed
11	IP Dome Camera with Intake Box External	Inside Common Room	No	Yes	Fixed
12	IP Dome Camera with Intake Box External	Small intervention classroom (Main Corridor)	No	Yes	Fixed
13	IP Dome Camera with Intake Box External	Quiet Room (Beach)	No	Yes	Fixed
14	IP Dome Camera with Intake Box External	Outside Deputy Headteachers office – Food Technology	No	Yes	Fixed
15	IP Dome Camera with Intake Box External	Above JB Classroom to ICT	No	Yes	Fixed
16	IP Dome Camera with Intake Box External	Above Food Technology - Deputy Headteachers office	No	Yes	Fixed
17	IP Dome Camera with Intake Box External	Quiet Room (SEA)	No	Yes	Fixed
18	IP Dome Camera with Intake Box External	Above outside staff changing room - Yr 7 corridor	No	Yes	Fixed
19	IP Dome Camera with Intake Box External	Mini Gym (internal)	No	Yes	Fixed

20	IP Dome Camera with Intake Box External	Gym (internal)	No	Yes	Fixed
21	IP Dome Camera with Intake Box External	Gym (internal)	No	Yes	Fixed
22	IP Dome Camera with Intake Box External	Gym (internal)	No	Yes	Fixed
23	IP Dome Camera with Intake Box External	Gym (internal)	No	Yes	Fixed
24	IP Dome Camera with Intake Box External	Above Gym door -external Gym door exit	No	Yes	Fixed
25	IP Dome Camera with Intake Box External	Yr7 Middle corridor – Archive room	No	Yes	Fixed
26	IP Dome Camera with Intake Box External	Yr7 Middle corridor – outside Yr8 classroom (HD)	No	Yes	Fixed
27	IP Dome Camera with Intake Box External	Above facilities manager office – Yr7 corridor/Admin corridor	No	Yes	Fixed
28	IP Dome Camera with Intake Box External	School counsellor room	No	Yes	Fixed
29	IP Dome Camera with Intake Box External	Admin corridor HT (ABW) office	No	Yes	Fixed

30	IP Dome Camera with Intake Box External	DSL Office	No	Yes	Fixed
31	IP Dome Camera with Intake Box External	Facing Reception/ Male toilets	No	Yes	Fixed
32	IP Dome Camera with Intake Box External	Office/ Facing female toilets	No	Yes	Fixed

Camera Number	Camera Type	Location	Sound	Recording Capacity	Swivel/Fixed
1	IP Dome Camera with Intake Box External	Car Park 1	No	Yes	Fixed
2	IP Dome Camera with Intake Box External	Gym Exit	No	Yes	Fixed
3	IP Dome Camera with Intake Box External	Gym Fire Exit	No	Yes	Fixed
4	IP Dome Camera with Intake Box External	Rear fence line near canal	No	Yes	Fixed
5	IP Dome Camera with Intake Box External	Rear of school, pointing at the school	No	Yes	Fixed
6	IP Dome Camera with Intake Box External	Service road, pointing from back to front of school	No	Yes	Fixed

7	IP Dome Camera with Intake Box External	Front door from inside	No	Yes	Fixed
8	IP Dome Camera with Intake Box External	Corridor to Ladies toilet	No	Yes	Fixed
9	IP Dome Camera with Intake Box External	Car park and vehicle gates	No	Yes	Fixed
10	IP Dome Camera with Intake Box External	Car park and vehicle gates	No	Yes	Fixed
11	IP Dome Camera with Intake Box External	Front gate	No	Yes	Fixed