



# HEALTH & SAFETY – TRUST LEVEL POLICY

Reference.ODST.003

Approval date: May 2021  
Review date: May 2023

**The Oxford Diocesan School Trust**

Oxford Diocesan Schools Trust  
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**Health & Safety Policy – Trust Level**

<b>Policy Reference:</b>	ODST.003
<b>Description:</b>	This document shows how the Trust deals with health and safety at the Trust level. Each school within the Trust will also have a site-specific Health & Safety Policy based on the model
<b>Status:</b>	Statutory Policy
<b>Policy Audience:</b>	Trust Board, Governing Body, Schools, Staff
<b>Trust Responsibility for Implementation:</b>	Chief Executive, advised by the Operations Manager
<b>Other related ODST policies &amp; procedures:</b>	School's Health & Safety Policy, risk assessments and procedures
<b>Governor Committee:</b>	Finance, Local Governing Body
<b>Date approved by the Board of Trustees / Local Governing Body:</b>	February 2019
<b>Signed on behalf of Board / Local Governing Body by:</b>	Kathy Winrow (Chair of Trustees)
<b>Trust Name:</b>	Oxford Diocesan Schools Trust
<b>School Name:</b>	TBC
<b>Date for Next Review:</b> (at least every 2 years)	February 2023
<b>Version + Schedule of Amendments:</b>	V.03 May 2021

In reviewing this policy, the Governing Board has had regard to the Equality Act 2010 and carried out an equality impact assessment. It is satisfied that no group with a protected characteristic will be unfairly disadvantaged by this policy.

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## 1. Introduction

As the employer of staff, the Oxford Diocesan Schools Trust (ODST) has overall responsibility for the health, safety and welfare of staff and students in its schools. The Trust recognizes its responsibility to promote a culture where Health & Safety issues are discussed in an open and positive way, to achieve ongoing improved standards and safe methods of work thereby ensuring a safe and secure environment for students, staff and visitors. The policy applies to all schools within the Trust and to all sites and locations. The Trust will comply with the requirements of Health and Safety legislation.

The Trust will support its schools in putting in place clear policies that focus on the key risks and in checking that control measures have been implemented and remain appropriate and effective.

This policy reflects the Trust's commitment to ensuring that Health and Safety is paramount to the business of the Trust and that effective Health and Safety actively contributes to the successful education of all our students.

In order to fulfil its monitoring role, and to initiate and review health and safety policies and procedures, ODST will ensure that appropriate processes are put in place at Trust level.

Although overall accountability for health and safety lies with the Trust, day-to-day responsibility for the health and safety of staff and students in individual schools is delegated to the Headteacher, who in turn will delegate particular functions to other staff, in particular the Premises Manager.

The local governing bodies of schools within the Trust are not the employers of staff but play an important role in ensuring strategic direction and will work in close partnership with the Headteacher and Senior Management Team of the school and relevant staff of the Trust to support good health and safety management.

## 2. Roles & Responsibilities for Health & Safety

### Trustees

The Board of Trustees, as a corporate body, has the responsibility to set the strategic direction and objectives of all health and safety matters across the Trust.

The Board of Trustees is responsible for ensuring that high standards of corporate governance are maintained. In the context of health and safety, it discharges these responsibilities by adopting an annual plan, monitoring ODST safety management systems and managing the Trust risk register. The overall aim is to ensure a positive health and safety culture is established and maintained across the Trust.

The Board of Trustees must ensure that all reasonable steps have been taken to reduce the possibility of accident or injury to staff, students and/or visitors.

The ODST Board of Trustees' responsibilities are to ensure that:

- each Member of the Board of Trustees accepts their individual role in providing health and safety leadership for ODST.
- it formally and publicly accepts its collective role and responsibility in providing health and safety leadership for ODST.
- its decisions reflect its health and safety intentions, as articulated in the ODST Health and Safety Policy Statement.

- strategic direction is provided in health and safety matters.
- ODST suppliers and contractors have been appropriately vetted for health and safety standards.
- ODST Estates and Health and Safety Committee is effectively discharging its delegated responsibilities in terms of health and safety.
- a proportionate and prioritised risk management system for the Trust is implemented and monitored.
- systems and processes are in place to ensure the Trust is compliant with its obligations in the management of fire risk, asbestos, legionella, electrical safety and other areas of health and safety.
- there is an effective business continuity and emergency plan in place.
- confirmation of no instances of material irregularity, impropriety, lack of integrity or negligence of health and safety statutory instruments is maintained.
- effective safeguarding of children is in place across the Trust.
- adequate resources are committed to the management of health and safety.

### **Estates and Health and Safety Committee**

The Estates and Health and Safety Committee's responsibilities are to review, recommend to the Board and implement the Trust health and safety strategic plan; identify and manage risk at all levels of the Trust and keep the Board of Trustees informed of all health and safety matters.

The Committee's responsibilities are to:

- inform and advise the Board of Trustees on:
  - review of the health and safety policy
  - risk mitigation
  - recommendations for health and safety audits and compliance audits
  - incidents reportable to the Health & Safety Executive under the 'Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR)' Regulations.
- monitor and report to the Board of Trustees on the effectiveness of the Trust's health and safety systems.
- ensure that there are adequate communication and co-operation channels between all levels of the Trust and relevant third parties, in the context of this policy.
- ensure that the health and safety policy and adequate health and safety management systems are in place within every school

### **Chief Executive Officer**

The Chief Executive Officer is responsible for the effective implementation of the Health and Safety Policy and for encouraging staff through regular monitoring to implement Health and Safety arrangements.

The Chief Executive Officer's responsibilities include:

- provision of an organisation which has clearly defined responsibilities leading to effective and comprehensive Health and Safety management.
- allocation of resources to comply with Health and Safety legislation and best practice so far as is reasonably practicable.
- ensuring that systems are in place so that all employees are fully aware of their statutory responsibilities by the inclusion of Health and Safety in all job descriptions and through Trust Induction.

- appointing the Operations Manager with special responsibility for Health and Safety and who is responsible for the overall coordination of health safety and welfare issues within the Trust and for monitoring the implementation and upkeep of Health and Safety policies.
- reviewing the health and safety performance of the Trust through annual Health and Safety reports and ensuring appropriate action plans are developed to facilitate continuous improvement.

### **Operations Manager**

The Operations Manager is the link between the Estates and Health and Safety Committee and the senior ODST members of staff with responsibility for health and safety within schools across the Trust and as such is responsible for ensuring that systems are in place and adhered to in order to minimize the likelihood of enforcement action, penalties and prosecutions.

The Operations Manager must:

- ensure that sufficient resources are allocated and authorised within the organisation's budget to meet statutory procedures and standards for health and safety in ODST schools.
- consider the impact of health and safety in all strategic and operational decision making.
- implement ways in reducing the likelihood of people being harmed by ODST activities.
- monitor findings from Health and Safety audits, compliance audits, inspection audits, Reporting of Injuries, Diseases and Dangerous Occurrences (RIDDOR) reports, and to implement changes to policy and procedures where required.
- implement and monitor an informed, proportionate and prioritised risk management system for the Trust
- ensure there is an effective accident reporting and investigation procedure across the Trust.
- ensure that the Trust and its schools have adequate business continuity plans in place, including emergency plans and procedures for the safe evacuation of the Trust's premises.
- agree with the Estates and Health and Safety Committee a programme of health and safety inspections.
- ensure the development and implementation of the overall health and safety strategic plan.
- ensure all staff receive adequate health and safety training
- be the point of contact with the Trust's appointed Health & Safety consultant (Oxfordshire County Council) and ensure that the arrangement is fit for purpose and represents good value for money.

## Headteachers

All Headteachers are responsible for ensuring that the day to day requirements regarding Health and Safety at work are met on their site. Where any new process or operation or substance is introduced into the area of their responsibility, they are to liaise with the ODST Operations Manager, and any outsourced Health and Safety provider, so that the associated risks are assessed and any precautions deemed necessary are implemented.

Each Headteacher is responsible for:

- ensuring that there are effective arrangements in place for business continuity along with an emergency plan and/or relevant emergency procedures. Communicating the policy and other appropriate health and safety information to all relevant people within the school, including occasional contractors not appointed by ODST Operations Manager.
- Ensuring that an investigation is carried out by a competent person, following an accident or incident, liaising with appropriate authorities and third parties as necessary.
- Ensuring that a school Health and Safety Committee is established and that the committee meets a minimum of twice per year. Where two or more schools share a site, a single committee can be established as long as there is representation from all schools.
- Reporting to the ODST Operations Manager any hazards which cannot be rectified within the school's budget.
- Ensure that risk assessments are undertaken for any activity that has significant associated hazards and that a written record of these assessments are kept and reviewed regularly.
- Ensuring that the school appoints a named Educational Visits Co-ordinator, who has recent relevant training to carry out the role (where educational visits are carried out by the school).
- Ensuring that there are effective health and safety management arrangements in place:
  - Appointing a named first aid co-ordinator for the school.
  - Ensuring that there is an adequate number of appropriate trained first aiders in the school.
- Ensuring that Health and Safety arrangements within the school are aligned to ODST Health and Safety Policy
- Ensuring that all reasonable steps have been taken to reduce the possibility of accident and injury to staff, students and visitors.
- Informing ODST's Operations Manager of all RIDDOR reportable accidents within 24 hours of the incident occurring.

## Other Line Managers in Schools or Central Team

All line managers have responsibilities for:

- applying the ODST Health and Safety policy to their own department or area of work. Developing, publishing and sharing with members of the team specific Health and Safety procedures for high risk activities within their department (i.e. School – Science, D&T, PE and Art)
- maintaining or having access to an up to date library of relevant published health and safety guidance from sources including CLEAPSS, AfPE and ensure that all staff are aware of and make use of such guidance
- ensuring regular health and safety risk assessments are undertaken for any activities / trips for which they are responsible and that control measures are implemented and shared with all staff.

- ensuring that, where necessary, the appropriate personal protective equipment is available, in good condition and used and that any other identified safety measures in the risk assessment are implemented.
- resolving any health and safety or welfare problems members of staff refer to them, informing the Headteacher, or Department Head within Central Team, of any problems to which they cannot achieve a satisfactory solution with the resources available to them.
- carrying out and recording regular inspections of their areas of responsibility to ensure that equipment, furniture and activities are safe. Reporting any defaults in line with procedure where required.
- checking the adequacy of fire precautions and procedures in liaison with the Headteacher, or Department Head within the Central Team. Ensuring that a copy of the Fire Action Notices and assembly point(s) are prominently displayed in all rooms and areas for which they are responsible.
- ensuring, so far as is reasonably practicable, the provision of sufficient information, instruction, training and supervision to enable other employees and students to avoid hazards and contribute positively to their own health and safety.
- establishing acceptable housekeeping and safe storage standards, in all areas of their responsibility.
- developing a training plan that includes specific job instructions and induction for new or transferred employees. Ensuring that the training needs of their staff are monitored, and training opportunities made available.
- ensuring that all accidents (including near misses) occurring within their department are promptly reports and investigated using the appropriate forms etc.

### **Employees (All)**

Under the Health and Safety at Work Act etc 1974 all employees have general health and safety responsibilities. Staff must be aware that they are obligated to take care of their own health and safety whilst at work along with that of others who may be affected by their actions.

All employees have a responsibility to:

- comply with the ODST Health and Safety Policy
- report all accidents and incidents
- report all defects in condition of premises or equipment and any health and safety concerns immediately to their line manager.
- report immediately to their line manager any shortcomings in the arrangements for health and safety.
- co-operate with the leadership and management team on all matters relating to health and safety.
- inform their line manager if something happens that might affect their ability to work safely (e.g. suffering an injury, taking prescribed medication, or becoming pregnant)
- ensure that they only use equipment or machinery that they are competent / have been trained to use.
- make use of all necessary control measures and personal protective equipment provided for safety or health reasons.



## Health & Safety School Policy for School (in the Oxford Diocesan Schools Trust)

### 1. General Statement of Intent

The Governing Body of our school undertakes to meet fully its responsibilities under the Health and Safety at Work Act 1974 to provide a safe and healthy working environment for employees and others, such as students, visitors, and contractors. Details of how this will be achieved are given in the **Arrangements** section of this policy.

The Governing Body will ensure that effective consultation takes place with all employees on health and safety matters and that all individuals are consulted before health and safety responsibilities are delegated to them.

Where necessary, the Governing Body will seek specialist advice to determine the risks to health and safety in the establishment and the precautions required to deal with them.

The Governing Body will ensure provision of sufficient information and training in health and safety matters to all employees in respect of the risks to their health and safety.

All employees must follow instructions to ensure the maintenance of high standards of health and safety in all school activities.

This policy includes a description of the establishment's organization and its arrangements for dealing with different areas of risk. Details of how these areas of risk will be managed are given in the **Arrangements** section.

### 2. Organisation

#### 2.1 Responsibilities of the Governing Body

The Governing Body will ensure that:

- a) The Headteacher produces a school health and safety policy for the school for approval and adoption by the governing body.
- b) Suitable and sufficient risk assessments of work activities are undertaken, and a written record of the assessments is kept.
- c) Sufficient funding is allocated for health and safety e.g. in respect of training, personal protective equipment etc.
- d) Regular safety inspections are undertaken.
- e) Inspection reports, including those from trade union health and safety representatives, are considered and acted upon.
- f) Health and safety is a standing item on all agendas.
- g) The school health and safety information (including accident reporting, risk assessments and school trips) is logged efficiently and in a timely manner on the Trust monitoring and reporting system ("Smartlog").
- h) A positive health and safety culture is established and maintained.

#### 2.2 Responsibilities of the Headteacher

The Headteacher is responsible for day to day overall management of health and safety in the school.

The Headteacher will ensure that:

- a) A health and safety policy is produced for approval by the Governing Body and that the policy is regularly reviewed and revised as necessary, at least every two years.
- b) Suitable and sufficient risk assessments of work activities are undertaken, that

a written record of the assessments is kept and that the assessments are reviewed annually or upon change in circumstances.

- c) For high risk activities, safe systems of work are identified via a suitable and sufficient risk assessment that is dated and signed.
- d) Information and advice on health and safety is acted upon and circulated to staff and governors.
- e) Regular inspections are carried with reports submitted to the Governing Body and Trust.
- f) An independent annual monitoring report is provided to Governing Body by the OCC Health & Safety team.
- g) There is co-operation with the Trust in meeting its legal requirements in respect of the monitoring of health and safety practices and procedures.
- h) Staff are competent to undertake the tasks required of them and have been provided with appropriate training by competent persons.
- i) Staff are provided with equipment or other resources to enable their work to be undertaken safely.
- j) Those who receive delegated responsibilities are competent; their responsibilities are clearly defined; they have received appropriate training and are provided with equipment or other resources in order to ensure that they can fulfil such duties.
- k) There is co-operation with, and provision of necessary facilities for, trade union health and safety representatives.
- l) Appropriate tasks are delegated to the School's Premises Manager and other premises staff.

### **2.3 Responsibilities of Senior Managers**

- a) Deputy and Assistant Headteachers may be required to undertake any of the Headteacher's duties which have been reasonably delegated to them which may include responsibility for health and safety management.
- b) Deputy and Assistant Headteachers may be expected to oversee health and safety matters relating to their curriculum areas.

### **2.4 Responsibilities of the Premises Manager<sup>1</sup>**

The Premises Manager will ensure that:

- a) Safe means of access and egress are maintained.
- b) The premises are kept clean and that adequate welfare facilities are provided.
- c) Safe working arrangements are in place when contractors are working on the premises.
- d) Adequate security arrangements are maintained.
- e) Adequate fire safety arrangements are implemented.
- f) Regular testing and recording of maintenance of electrical equipment, including portable equipment, takes place.
- g) Adequate systems are in place for the management of asbestos and control of legionella.
- h) All premises-related accidents/incidents are recorded and investigated.
- i) Regular recorded inspections of the premises take place, with union safety representatives invited to take part.
- j) A copy of the Health and Safety Law poster is displayed in an easily accessible location.

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<sup>1</sup> In some schools this position may be known as Facilities Manager or Caretaker.

## 2.5 Responsibilities of all Employees

Implementation of the policy is a management responsibility by the co-operation of all employees is essential.

All staff employed by the school will act responsibly to ensure that:

- a) They are familiar with, and comply with, the Health and Safety Policy.
- b) They take reasonable care for their health and safety at work and that of other persons who might be affected by their acts or omissions both at work and during off-site activities.
- c) They report immediately, to the Headteacher or to their line manager, any serious or immediate danger of which they become aware.
- d) They report immediately, or as soon as practicable, any defects noted that plant, equipment, machinery, or the workplace generally to the Headteacher or to their line manager.
- e) There is no misuse of anything that has been provided for health and safety purposes.
- f) They use the correct equipment and tools for the job and any protective equipment that may be supplied.

## 2.6 Responsibilities of all Students

All students will be encouraged to follow safe working practices and observe safety rules.

All students will:

- a) Follow all instructions issued by any member of staff in case of emergency.
- b) Ensure that they do not recklessly or intentionally interfere with safety equipment, for example, fire extinguishers and fire alarms.
- c) Inform a member of staff of any situation which may affect their safety or that of other students or staff.

## 3. Arrangements

### 3.1 Health and Safety Representatives

Under the Safety Representatives and Safety Committees Regulations 1977, a recognised independent trade union has the right to appoint safety representatives. Recognised trade unions will inform the school in writing when a health and safety representative on has been appointed and, where this is the case, the school will consult with that representative on health and safety matters. Trade union health and safety representatives are entitled to raise any issue of health and safety as it affects employees. Our School will consult in good time with health and safety representatives on any measures which may affect the employees represented by the health and safety representative. The School will ensure that paid time off is provided for the inspections that the health and safety representative is entitled to undertake as well as for training necessary to enable the health and safety representative to carry out their functions effectively.

The members of staff who are health and safety representatives for the recognized trade unions are:

Trade Union	Name of Health and Safety Representative
<i>(insert details)</i>	

## 3.2 Health and Safety Committee

The School may establish a safety committee to enable management and trade union representatives to work together to ensure not only compliance with the law but also the development of a positive health and safety culture within the workplace. The School recognises that when employees are actively engaged in health and safety, workplaces have lower accident rates.

## 3.3 Health and Safety Policies and Procedures

The School will adopt the School Trust's arrangements or, where necessary, establish its own arrangements, which may be set out in separate policies or a manual, for addressing the following areas:

- Reporting of Incidents / Accidents / Abuse
- Asbestos management (where applicable)
- Contractors on site
- Off-site activities
- School security
- Slips and trips
- Vehicle movements
- Fire safety
- Electrical safety
- Minibus safety (where applicable)
- ICT use
- First aid
- Lifting / handling
- Infectious diseases
- Severe weather
- Administration of medicines
- Critical incidents
- Lone working
- Dignity at Work
- Stress management
- Water safety / legionella
- Working at Height
- Driving at work
- Chemical Safety (COSHH)
- Hygiene Standards
- Commissioning and Monitoring of Contractors

## **Arrangements in Place Supporting the Health, Safety and Security Policy**

The following arrangements have either been established through risk assessment at Trust level or are national standards. Each Faculty/Area will produce a risk assessment specific to their area.

### **Accident / Incident Recording / Reporting**

Any accident or injury is to be reported in accordance with the Trust's accident reporting procedures (all accidents must be logged on the "Smartlog system") to the Operations Manager by the person involved in the accident or by the direct line manager.

All significant accidents or incidents that are considered to be dangerous and near miss situations are to be reported. An immediate investigation into the incident must occur in order to identify the cause of the accident and the measures taken to prevent a reoccurrence.

### **Non-Smoking**

Smoking is not permitted on any part of the Trust premises or grounds.

### **Asbestos**

A copy of the School Asbestos Management Plan (AMP) is to be maintained and kept up to date on the Health and Safety system ("Smartlog") by the school. The Operations Manager should be notified of any major works planned and any work involving access to roof voids, demolition or drilling into the ceilings/floors/walls, must be approved in advance to ensure asbestos is not likely to be disturbed.

All staff are advised that asbestos containing materials (ACMs) across the Trust premises are not always labelled and that they should not pin, drill or otherwise potentially dangerous walls, ceilings, floors etc. Staff are advised to assume that asbestos is present if in any doubt.

### **Contractors on Site**

It is the responsibility of contractors to read and comply with the Trust's Health & Safety Policy and Health & Safety Procedures. Contractors working on site are required to comply with the working rules as issued by the Trust. Any breach of these rules is to be reported to the Operations Manager.

### **First Aid**

The Trust and School will meet the basic recommendations for first aiders, and will promote basic awareness of first aid to all staff. The School will maintain a list of all qualified first aiders and monitor their training needed as and when required. The list of first aiders and training records will be maintained on the "Smartlog" system.

### **First Aid Boxes / Materials**

First aid boxes are kept on site and these only contain approved materials. The boxes are available for first aid use for staff / students / visitors on site.

### **General Maintenance**

All equipment on site will be maintained in efficient working order to ensure that it is safe to use. Without detracting from the generality of the above, the following maintenance arrangements have been made.

**a) Electrical Installation**

The fixed electrical installation will be tested by electrical maintenance contractors as required by the Electricity at Work Legislation.

**b) Portable Electrical Equipment**

Portable electrical equipment is to be visually checked by staff before use, and if any defects are noted the item is to be put out of use and reported immediately to the Premises Manager. In addition, the portable electrical equipment is subject to an annual check in line with Legislation.

**c) Faculty Specific Equipment**

This will be checked as highlighted in the Faculty Risk Assessment

**d) Defective Equipment & Tools**

All defects found in hand tools, power tools or any other equipment must be reported to the line manager who in turn will report to the Operations Manager. The equipment concerned is to be withdrawn from service, clearly marked and isolated in an area where it cannot be re-issued for further use until report has been affected.

### Computer Workstation Assessments

The Trust will ensure that all other DSE Regulations are met. If staff have any questions on DSE, they should initially speak to their line manager, who will refer the matter to the Operations Manager if unable to resolve it.

### Fire

A fire risk assessment (FRA) has been undertaken in line with the requirements of the Regulatory Reform (Fire Safety) Order and this identified the physical fire precautions in the School, the measures to prevent fires starting, and the measures to ensure everyone can escape from the building in the event of a fire. The FRA information should be kept up to date and maintained on the “Smartlog” system. Fire evacuation procedures have been circulated to all staff, are displayed in Main Reception for visitors to consult, and notices are displayed in all teaching rooms on what to do in the event of a fire. Fire drills take place each term, and fire-fighting equipment is regularly maintained.

### Hazardous Substances

Specific Faculty areas (e.g. Science and D&T) and cleaning and catering will keep records of risk assessments, COSHH assessments, CLEAPSS documentation, and copies will be held centrally by the Operations Manager. If staff have any questions on hazardous substances these should be raised with their line manager.

### Manual Handling

Personnel or students are not to lift, drag, push or carry heavy or awkward loads unless training has been undertaken and risk assessments carried out.

### Security

Trust sites are regularly reviewed in terms of security and the Trust endeavours to constantly monitor and review security measures in order to provide a safe and secure environment for students, staff, visitors and contractors on site. Staff are encouraged to report any issues or concerns to the Operations Manager.

## **Water Assessment and Control**

Measures are in place for the regular monitoring and recording of hot and cold-water systems to manage the risk of legionnaires disease. A Water Hygiene Risk Assessment will be carried out every two years in accordance with L8 legionnaires' disease. The control of legionella bacteria in water systems, approved Code of Practice and guidance on regulation.

## **Work at Height**

Work at height legislation identifies work at height as any work where someone or something can fall a distance likely to cause injury (e.g. putting up displays). Staff should not carry out such activities unless training has been undertaken and an appropriate risk assessment carried out.

## **Transport**

The Trust has adopted the following guidelines for the transport of pupils:

- Staff that use their own cars to transport students / equipment during the working day must ensure that they are adequately insured (e.g. business use).
- Only staff with a council approved certificate are allowed to drive the minibus with students on board and must ensure they follow the relevant minibus procedures.

## **Out of School Visits**

All personnel that arrange or actively participate in school visits or out of school activities must follow the Trust and/or School's procedures.

## **Visitors**

It is the duty of all personnel within the Trust to ensure the Health and Safety of all visitors. Visitors should not be allowed to enter work areas unaccompanied.

## **CCTV**

The cameras in use are static and the purposes for which the CCTV system is used are:

- Security
- Monitoring of Behaviour

The responsibility for overseeing the system and procedures is held by the Operations Manager. Signs are displayed at all receptions notifying visitors of the presence of CCTV cameras. The images that are taken are held in a secure location and can only be accessed by authorised personnel. Unless required for evidential purposes, the retention period of any images recorded by the CCTV footage is 30 days. Any footage that is over this period is destroyed by over-writing. Images will not normally be released to their parties unless required by legislation or a request by police. Any images released under the auspices of a Subject Access request will first ensure that the identify of other parties other than the party making the request are anonymized. The Trust would normally charge for this service. Where images are required by the police the Trust will ensure the request is in writing.