



Royal College of Art

RCA Estates

CCTV Policy

The purpose of this policy is to outline the regulatory requirements and procedures on how College staff or their contractors are required to monitor and manage the CCTV installation and the data created.

This CCTV Policy has been produced in accordance with the Code of Practice for CCTV as published by the Information Commissioner's office.

RCA Estates are the responsible Department for the implementation of this policy and to provide documented accountability for the viewing, transferring or distribution of CCTV footage.

An Equality Impact Assessment was completed for this policy in March 2023.



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1. Executive Summary

This Policy outlines the regulatory requirements and gives procedures on how College staff are required to monitor and manage the CCTV installation and the data created. This CCTV Policy has been produced in accordance with the Code of Practice for CCTV as published by the Information Commissioner's office.

This Policy does not cover digital or webcam recordings made on software for the purpose of meetings, lectures, presentations, events or otherwise.

2. Assessment Process

2.1 Responsible Person

The equipment is operated and managed by:

Royal College of Art
Kensington Gore,
London SW7 2EU

The nominated responsible person for the day to day running of the scheme and compliance with this policy is Operations Manager - Security

Telephone: 020 7590 4171
Email: estates@rca.ac.uk

2.2 Purpose of the Scheme

The CCTV scheme is designed and used for the detection and prevention of crime and for the safety of staff and students. A comprehensive surveillance system is installed consisting of cameras, software, and associated storage.

2.3 Disclosure

The Royal College of Art may, on request, make data available to law enforcement authorities, in the proper conduct of enquiries that may or may not be associated with the College.



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Access must be restricted and carefully controlled in accordance with this policy to protect the rights of individuals but also to ensure the chain of evidence remains intact should the images be required for evidential purposes. The reasons for disclosure must be compatible with the principles of the system described in clause 2.2 above.

3. Siting Cameras

3.1 General camera siting principle

All cameras are positioned in such a way as to monitor only College premises or adjacent public highways where this is unavoidable. The system comprises digital cameras in selected locations, which are controlled through the approved control software.

3.2 Operator standards

- Under Section 4(4) of the Private Security Industry Act 2001, it is a criminal offense to undertake the licensable activities of a public space surveillance CCTV operative without a Security Industry Authority (SIA) license.
- Only licensed operators can use the cameras for the purposes as defined in clause 2.2. Operatives must be made aware of this policy and particularly the restrictions on the use of the cameras and the information captured.
- On no account should pan tilt zoom (PTZ) cameras be used to monitor areas other than those intended under this policy.

3.3 Signage

All campus areas protected by CCTV apparatus shall have conspicuous approved standard CCTV signage posted at or near to the entrance points and other areas where the public may be filmed depicting the College identity, the purpose of the scheme and the responsible persons contact details.

4. Quality of Images

4.1 Data capture

Cameras are digital and data is captured digitally and recorded, there is regular maintenance of the apparatus. The quality of image is paramount and shall be maintained throughout the working life of the system.



4.2 Standards to be maintained

- The College will keep in place a service contract throughout the life of the system.
- The College must ensure that date and time functions are regularly checked and updated against a recognised calibrated reference. The position and location of the camera shall be accurately described within the software
- There is no automatic facial recognition software installed
- The College will endeavour to ensure that lighting levels adjacent to camera locations are sufficient to maintain a quality of image overnight or utilise low light capable cameras.
- In the event of a report of faults or damage to any camera it is the responsibility of the Operations manager - Security, to follow the process through to rectification including a replacement camera if necessary.
- The College contact point indicated on signage should be available to members of the public during office hours. Employees staffing that contact point should be aware of the policies and procedures governing the use of the CCTV equipment.
- The Operations manager -Security or their appointed deputy shall maintain an up to date logbook for the CCTV system covering all premises and any reference to documentation within this code of practice will be entered in this logbook under a dated entry.

5. Processing the Images

5.1 Security of images

- Images shall be securely kept for a maximum period of 30 days unless and only if required for evidential purposes.
- The College will erase images by overwriting after 30 days unless the image is required for evidential purposes whereupon all copies however captured shall be kept securely by the Operations manager- Security.
- Where images are removed through whatever media, they shall be marked with the following:

i. The date on which they were removed from the general system for legal proceedings.

ii. The reason why they were removed from the system.

iii. The crime incident number appropriate to the relevant incident



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- iv. The location of the images*
- v. A signature of an authorised person collecting the images together with their name and business address of that authorised person.*

5.2 Position of monitors

All monitors will be sited in such a way as to be kept away from general display, and only monitored by appropriately licensed persons.

5.3 Procedure for access to and disclosure of images

- All requests for access to images shall be directed to the Operations manager - Security. Requests for CCTV footage that includes images of identifiable individuals will be shared with the Data Protection Officer.
- Where footage includes images of identifiable individuals, law enforcement authorities will be required to provide suitable documentation, such as a Metropolitan Police CCTV request form, specifying purpose and lawful exemption for their access. In exceptional circumstances, where disclosure could protect the vital interests of a person or persons, a form will not be required and footage such be disclosed with urgency.
- Access to recorded images shall be restricted to security staff and as required for maintenance and IT issues, authorised IT or technical staff whose access is essential to the operation of the system.
- In exceptional circumstances, and as approved by the Data Protection Officer, senior staff members on investigatory panels may view footage only for the purpose of resolving internal investigations where it does not infringe upon the freedoms and rights of individuals. Licensed staff will review footage for relevance prior to disclosing to senior team members.
- Any access to recorded images however trivial shall be documented.
- Where access is allowed, viewing of recorded images shall take place in a secure environment and will be done by persons that hold a valid to Security Industry Authority (SIA) CCTV license.
- The CCTV logbook shall be annotated with the following at the time of every viewing:

- i. The date and time of removal*
- ii. The name of the person removing the images*



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- iii. The name(s) of the person(s) viewing the images. If this should include third parties, the name of the organisation of that third party*
- iv. The reason for the viewing*
- v. The outcome, if any, of the viewing*
- vi. The date and time the images were returned to the system or secure place, if they have been retained for evidential purposes*

- Disclosure of recorded images to third parties should only be made in limited and prescribed circumstances such as:

- i. Law enforcement agencies in a specific criminal enquiry*
- ii. Prosecution agencies*
- iii. Relevant legal representatives*
- iv. By request of individual under Data Protection Subject Access Request*
- v. Or, as advised by the Data Protection Officer and Senior Management Team*

- On no account shall images be made available to the media or be posted on the internet.
- Where 3rd party individuals' data needs to be protected a professional editing company must be used to disguise or blur the images of individuals so that they are not readily identifiable.
- The editing company must give appropriate guarantees by explicit written agreement regarding the security measures they will take in relation to the images and that the images will be used only in accordance with the instructions of the Director of Estates.

5.4 Staff training

- The College shall endeavour to make all staff aware of the procedure to be followed when accessing recorded images and shall train all staff in their responsibilities under this policy and the Code of Practice for CCTV as published by the Information Commissioner's office, particularly:

- i. This policy for access to recorded images at clause 5.3*
- ii. This disclosure policy at clause 2.4*



iii. Rights of individuals in relation to their recorded images at 5.5 including the prevention of processing likely to cause substantial and unwarranted damage to that individual and to prevent automated decision taking in relation to that individual

5.5 Right of subject access

- Data subjects requesting access to recorded images shall be given a standard subject access request form, an example of which is given on page 9 of this document. Verbal requests can be made, and should be recorded by staff using the subject access request form.
- All completed forms shall be dealt with by the Data Protection Officer and Operations manager- security or their appointed deputy who will locate the image(s) and determine whether disclosure would entail disclosing images of third parties.
- All responses to requests for CCTV images shall be responded to within one calendar month from receipt of form.
- Where third party images are to be disclosed then they shall be disguised or blurred as per clause 5.3 above.
- Where the Data Protection Officer and Ops Manager Security or their appointed deputy decides that a subject access request from an individual is not to be complied with, the following shall be documented:

i. The identity of the individual making the request

ii. The date of the request

iii. The reason for refusing to supply the images requested

iv. Right to complain to RCA's Data Protection Officer and the Information Commissioner's Office.

- Requests made in relation to other data subject rights: right to be informed, right of rectification, right of erasure, right to restrict processing, right to data portability, right to object and rights in relation to automated decision making shall be sent to the Data Protection Officer for handling. Any such request shall be responded to by the Data Protection Officer within one calendar month. The Data Protection Officer shall keep record of:

i. The original decision

ii. The request from the individual



iii. Their response to the request from the individual

5.6 Enquiries

- Enquirers should be provided on request with one or more of the following:
 - i. A copy of this policy*
 - ii. A subject access request form if required or requested*
 - iii. The complaints procedure to be followed if they have concerns about the use of system or non compliance with the provisions of this code of practice.*

6. Complaints

6.1 Procedure

- All complaints concerning the equipment and operation of the CCTV system shall be taken seriously and should be directed in the first instance to the Ops Manager - Security
- Any complaints that relate to the recording of an individual in respect of the Data Protection Act 2018 shall be advised on by the Data Protection Officer.
- Complainants should be given a copy of this code of practice including the complaints procedure.
- A detailed summary of the complaint will be recorded in the CCTV log book under the heading *complaint* so that complaint statistics may be established in the future if required. The written complaint should be appended to the log book.
- Complaints shall be dealt with in an efficient manner with a response to the complainant within 21 days detailing the nature of the complaint and any remedial measures taken to uphold the complaint or indeed to reject the complaint. An option to direct the complaint to the Director of Estates in regards to the operation of the system shall be offered and to the Registrar or HR concerning adherence with this code of practice.
- All complaints shall be thoroughly investigated by the Ops Manager - Security who shall record all findings in the CCTV logbook.
- Where a complaint is upheld, appropriate remedial action shall be taken. This may include disciplinary action, re-training, redeployment, system maintenance or adjustments.



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7. Monitoring Compliance

7.1 Annual review

- The Ops Manager - Security shall undertake an annual review of the documented procedures to ensure that the code of practice is being complied with. A brief report with statistics shall be produced which should determine the effectiveness of the system and to assess compliance.



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CCTV SUBJECT ACCESS REQUEST FORM

Written request in accordance the Data Protection Act 2018 for the supply of personal data held.

NAME		
ADDRESS		
	POSTCODE	
TELEPHONE	DAYTIME	MOBILE
EMAIL		
INFORMATION REQUIRED		
REASON		
DATE, TIME & LOCATION OF DATA REQUESTED		
DATA FORMAT	VISUAL IMAGE ONLY <input type="checkbox"/> HARD COPY <input type="checkbox"/>	
<p>Please supply the above information to me in accordance with the Act and College Code of Practice. I understand that there is a £10 fee payable in advance for this information and that the information will be provided promptly and in any event within 40 days of receipt of fee.</p>		
SIGNED		
DATE		
FOR OFFICIAL USE ONLY		
DATE RECEIVED		
DATA ISSUED DATE		
REFUSAL REASON		