

## **Closed Circuit Television (CCTV) Policy**

### **1. Introduction**

Royal Academy of Dance (RAD) uses closed circuit television (CCTV) images to monitor the RAD's premises at 36 Battersea Square, SW11 3RA in areas that cannot otherwise be monitored by other methods in order to provide a safe and secure environment for students, employees and visitors and to prevent the loss or damage of RAD property.

- 1.1. The system comprises a number of fixed cameras.
- 1.2. The system records images only and does not have sound capability.
- 1.3. The CCTV system is owned and operated by the RAD, the deployment of which is determined by the RAD's senior management team.
- 1.4. The CCTV is managed by the Head of Facilities and it is monitored centrally from reception by Facilities Department employees.
- 1.5. Consultation with employees and students will take place prior to any significant changes to CCTV monitoring.
- 1.6. The RAD's CCTV scheme is registered with the Information Commission Office (ICO) under the terms of the Data Protection Act 1998. The use of CCTV and the associated images is covered by the Data Protection Act 1998. This policy outlines the RAD's use of CCTV and how it complies with the Act.
- 1.7. All Facilities Department employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All relevant employees are trained in their responsibilities under the ICO's publication, "In the picture: a data protection code of practice for surveillance cameras and personal information". All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images

### **2. Statement of Intent**

- 2.1. The RAD complies with the ICO's code of practice for surveillance cameras to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of practice published in May 2015 is available at <https://ico.org.uk/for-organisations/guide-to-data-protection/cctv/>

- 2.2. CCTV warning signs are clearly and prominently placed on the
- Main building front door
  - Fonteyn Centre front door
  - Boiler house bike rack wall
  - Ashton fire escape door

### **3. Siting the Cameras**

- 3.1. Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described in 1.1 above) and care is taken to ensure that reasonable privacy expectations are not violated.
- 3.2. The cameras are positioned so that their coverage is restricted to RAD premises, which includes outdoor areas.
- 3.3. Employees have access to details of where CCTV cameras are situated in the Employee Handbook and full details are also available in Appendix 2.

### **4. Storage and Retention of CCTV images**

- 4.1. Recorded footage will be retained for four weeks. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 4.2. All retained data is stored securely in accordance with the RAD Information Security Policy on the CCTV Video Recorder hard drive.

### **5. Access and Disclosure of CCTV images**

- 5.1. Day to day access to recorded images is restricted to those employees authorised to view them, which includes the Head of Facilities and members of the Facilities team
- 5.2. Access to recorded images is also given to the senior management team and the Head of HR in the event of an investigation being carried out.
- 5.3. Images will not be made more widely available, except in the case of an internal investigation (including any safeguarding investigations) which may or may not be related to the RAD's disciplinary and grievance procedures (as published in the Employee Handbook) or for relevant student grievance and disciplinary procedures. During such investigations it may be necessary to share recorded footage with others involved in the investigation.
- 5.4. There will be no disclosure of recorded data to third parties other than to the police or other authorised external organisations with crime prevention or law enforcement functions, provided the authenticity of the person making the request is established and the recorded data is required to prevent or detect a crime or to catch or prosecute an offender.

## **6. Subject Access Requests (SAR)**

- 6.1. Individuals have the right to request access to existing CCTV footage relating to them under the Data Protection Act.
- 6.2. The RAD has a procedure for Subject Access Requests available on the RAD website and SelectHR which outlines how to apply for a Subject Access Request and the procedure that will be followed when handling a request.
- 6.3. The RAD reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **7. Complaints & Enquiries**

- 7.1. Complaints and enquiries about the operation of CCTV on RAD premises should be directed to the Head of Facilities in the first instance.

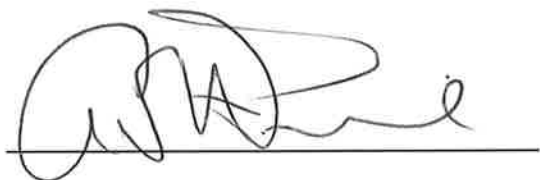
## **8. Publication & Implementation**

- 8.1. The CCTV policy is given to all new employees at Induction and forms part of their initial briefing. The document is also available to all employees via SelectHR and all employees are alerted to revisions.
- 8.2. The CCTV policy is also available on the RAD website for the general public, employees, freelance workers, students and visitors to the premises.

## **9. Policy Ownership and Review**

- 9.1. This policy is owned by the RAD Data Controller, details of which are available in the RAD Data Protection Policy & Procedures available on the RAD website and SelectHR.
- 9.2. The RAD has a Data Protection Committee and the effectiveness of this policy is the responsibility of that Committee.
- 9.3. This policy and associated policy and procedure are reviewed on a bi-annual basis (or more frequently if legislative or other changes require) by the Data Protection Committee for approval by the Senior Management team and ratification by the Board of Trustees.

## 10. Authority and signature

A handwritten signature in black ink, appearing to be 'M. A. ...', written over a solid horizontal line.

Chairman  
On behalf of the Board of Trustees

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First approved December 2015

## Appendix I

The RAD CCTV system and the images produced by it are controlled by the RAD's Data Controller, the Director of Finance and Administration who is ultimately responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act).

The Head of Facilities is responsible for the management of the CCTV on a day to day basis.

The RAD has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of employees, students and visitors and RAD property. CCTV is not used for any other purposes and an annual review of the use of CCTV is carried out.

	<b>Checked (Date)</b>	<b>By</b>	<b>Date of next review</b>
Notification has been submitted to the Information Commissioner and the next renewal date recorded	30.10.2015	Director of Finance & Administration	Oct 2016
There is a named individual who is responsible for the operation of the system	30.10.2015	Head of Facilities	2017
A system has been chosen which produces clear images which the law enforcement body (police) can use to investigate crime and these can easily be taken from the system when required	30.10.2015	Head of Facilities	2017
Staff and members of the RAD are consulted if there is any significant change in the use of CCTV	30.10.2015	Head of HR	2017
Cameras are sited so that they provide clear images	30.10.2015	Head of Facilities	2017
Cameras have been positioned to avoid capturing the images of people not visiting the premises	30.10.2015	Head of Facilities	2017
There are visible signs showing that CCTV is in operation.	30.10.2015	Head of Facilities	2017
Images from the CCTV are securely stored where only a limited number of authorised persons may have access to them.	30.10.2015	Head of Facilities	2017
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be	30.10.2015	Head of Facilities	2017

investigated			
Except for law enforcement bodies, images will not be provided to third parties.	30.10.2015	Head of Facilities	2017
The potential impact on individual's privacy has been identified and taken into account in the use of the system	30.10.2015	Senior management	2017
The RAD has a procedure for responding to individuals making requests for copies of their own images.	30.10.2015	DP Committee	2017
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	30.10.2015	Head of Facilities	2017

**This checklist will be reviewed when the Policy is reviewed or more frequently as necessary.**

## **Appendix 2**

The RAD has 16 CCTV cameras covering RAD's premises in the following places:

### **1. Outside (on RAD premises)**

- 1.1. Main front door entrance to reception;
- 1.2. Benesh entrance / bike racks;
- 1.3. Car park

### **2. Main Building**

- 2.1. Reception;
- 2.2. Shop;
- 2.3. IT fire escape;
- 2.4. Student Common room stair case fire exit;
- 2.5. Genee entrance;
- 2.6. Genee fire exit;
- 2.7. Library;
- 2.8. 2nd floor corridor lift end;
- 2.9. 2nd Floor corridor print area;
- 2.10. Karsavina 3rd floor lobby;
- 2.11. Espinosa 3rd floor lobby

### **3. Fonteyn Centre**

- 3.1. Ground floor Reception
- 3.2. 1st floor Ashton lobby.