

# ROYAL ACADEMY OF DANCE

## Closed Circuit Television (CCTV) Policy

### 1. Introduction

- 1.1. Royal Academy of Dance (RAD) uses closed circuit television (CCTV) images to monitor the RAD's premises at 188 York Road, SW11 3JZ in order to provide a safe and secure environment for students, employees and visitors and to prevent the loss or damage of RAD property.
- 1.2. The system comprises a number of fixed cameras.
- 1.3. The system records images only and does not have sound capability.
- 1.4. The CCTV system is owned and operated by the RAD, the deployment of which is determined by the RAD's senior management team.
- 1.5. The CCTV is managed by the Head of Facilities and it is monitored centrally from reception by the Facilities Department.
- 1.6. Consultation with employees and students will take place prior to any significant changes to CCTV monitoring.
- 1.7. The RAD is registered with the Information Commission Office (ICO) under the terms of the Data Protection Act 2018. Under the **UK General Data Protection Regulations**: CCTV digital images, if they show a recognisable person, are personal data and are covered by the UK General Data Protection Regulations. This policy outlines the RAD's use of CCTV and how it complies with the Act.
- 1.8. All Facilities Department staff with access to images as part of their role, are aware of the procedures that need to be followed when accessing the recorded images. All relevant staff are trained in their responsibilities when accessing CCTV images through the Educare online training. 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 Surveillance Code of practice published in 2022 is available at: [Surveillance Camera Code of Practice \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- 2.2. CCTV signage stating contact information is clearly and prominently placed at the control areas to the perimeter of the building, Library and first floor entrance.

- 2.3. The planning and design aims are to ensure that the CCTV 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.
- 2.4. This Policy is associated with the **Royal Academy of Dance** General Data Protection Policy, the provisions of which should be adhered to at all times.

### 3. Roles and Responsibilities

**COO** - Has overall responsibility for ensuring compliance with the relevant legislation and the effective operation of this policy

**Head of Facilities** - Responsible for the day-to-day management of the CCTV how it is used including the holding images, the review of images for sharing where necessary i.e. DSAR/ Investigations and responsible for the management and maintenance of the CCTV systems. Undertake initial investigations, obtain images required for review of DSAR's and inform the Head of HR /COO/ DPO without undue delay. Will liaise with external agencies including Police.

**Facilities Manager** - Will undertake Head of Facilities role in the absence of the Head of Facilities. Review CCTV footage and report to Head of Facilities.

**Facilities Officer** – Act on the Head of Facilities and / or Facilities Manager's instructions regarding the access of CCTV images.

#### Consultation and review

**Head of People** – Instigate the review process for access to images for internal HR related instances and liaise with Head of Facilities for images for investigatory purposes

**COO** – Reviewing DSAR's requests, including investigatory purposes and sign off for the release of images.

**DPO** – Review the Policy is compliant with legislation and keeping it up to date with current legislation. To advise on DSAR's and Data Breaches and liaise with the ICO as necessary.

#### Purpose of system

- 3.1. The system has been installed by Royal Academy of Dance with the primary purpose of reducing the threat of crime generally, protecting Royal Academy of Dance premises and helping to ensure the safety of all Royal Academy of Dance staff and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:
- Deter those having criminal intent
  - Assist in the prevention and detection of crime
  - Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order

- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being initiated and may assist in providing evidence

3.2. The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound.
- For any automated decision taking

#### **4. Siting the Cameras**

- 4.1. Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described in 1.1 and 3 above) and care is taken to ensure that reasonable privacy expectations are not violated. The RAD will ensure that the location of equipment is carefully considered to ensure that images captured comply with this Policy.
- 4.2. The RAD will make every effort to position cameras so that their coverage is restricted to RAD premises, which includes outdoor areas.
- 4.3. Employees have access to details of where CCTV cameras are situated and full details are available in Appendix 1.

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

- 5.1. Recorded data will not be retained for longer than is necessary. 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.
- 5.2. All retained data is stored securely in the CCTV Video Recorder hard drive for a period of a rolling 30 days.
- 5.3. If data is subject to a DSAR or an investigation, then that data will be held securely by the Head of Facilities until it is no longer needed. It will then be deleted.

#### **6. Access to CCTV images**

- 6.1. Access to recorded images is restricted to those employees authorised to view them, which includes members of the senior management team, Head of Facilities, Facilities Manager, Facilities Support Officer and Head of People. Access requests will be made to the Head of Facilities Asset Holders and a Data Subject Access Request (DSAR) form will need to be completed prior to CCTV viewing. Completed DSAR's will be held with the Facilities Department.
- 6.2. Images will not be made more widely available, except in the case of an internal investigation when it may be necessary to share recorded footage with authorised individuals.

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

- 7.1. Individuals have the right to request access to CCTV footage relating to them under the UK GDPR.
- 7.2. CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulations. They do not have the right of instant access.
- 7.3. The Subject Access Request procedure can be found on the RAD Shared Drive. Alternatively, contact a member of the Facilities Department via [FacilitiesDepartment@rad.org.uk](mailto:FacilitiesDepartment@rad.org.uk) who will direct and assist you if your DSAR is related to CCTV images.
- 7.4. 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.
- 7.5. If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing within 1 month, stating the reasons.

## **8. Access to and Disclosure of images to third parties**

- 8.1. Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following authorities:
  - Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
  - Prosecution agencies
  - Relevant legal representatives
  - The media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime
  - People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
  - Emergency services in connection with the investigation of an accident.
- 8.2. Requests from law enforcement agencies must have the appropriate Data Processing Act (DPA) Release Form or a Court Order. The request for release will be considered and the decision by RAD to release or not release data. The form should be fully completed and signed by the appropriate supervising officer.
- 8.3. Recorded data may be used within investigations related to the RAD's discipline and grievance procedures as published on the Shared Drive and for relevant student grievance and disciplinary procedures.

## 9. Complaints & Enquiries

- 9.1. Concerns or enquiries relating to the provision of General Data Protection Regulations and/or the Data Protection Act 2018 may also be addresses to the (COO and/ or the DPO). These rights do not alter the existing rights of anyone under any relevant grievance or disciplinary procedures.

## 10. Data Breach

- 10.1. A “Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed”
- 10.2. In the event that a data breach occurs, an initial assessment of the breach will be made immediately by the Head of Facilities, Head of People, COO and the DPO will be informed without undue delay.
- 10.3. Immediate steps will be taken to ensure that the breach is contained and the effects of the breach minimised and mitigated as much as possible.
- 10.4. If the data breach is deemed to be reportable to the Information Commissioner’s Office, the ICO will be notified within 72 hours of the discovery of the breach. The ICO can be informed via their website at: <https://ico.org.uk/for-organisations/report-a-breach/> or by telephone: **0303 123 1113**
- 10.5. In the case of a serious breach, Data Subjects whose data has been affected will be notified, in writing.

## 11. Compliance monitoring

- 11.1. The contact point for staff or members of the public wishing to enquire about the system will be Facilities Department by pre-arranged appointment.
- 11.2. Upon request enquirers will be provided with:
  - A summary of this statement of policy
  - A Data Subject Access Request form (DSAR) if required or requested
  - A copy of the Royal academy of Dance complaints procedures
- 11.3. All documented procedures will be kept under review
- 11.4. The effectiveness of the system in meeting its purposes will be kept under review and reports submitted as required to senior management.

## 12. Publication & Implementation

- 12.1. The CCTV policy is available to all new employees on the Shared Drive
- 12.2. The CCTV policy is also available on the RAD website for the general public, employees, freelance workers, students and visitors to the premises.

### **13. Policy Ownership and Review**

- 13.1. This policy is owned by the Head of People and Head of Facilities, details of which are available on the RAD Shared Drive
- 13.2. The RAD has a Data Protection Committee who monitor the effectiveness of this policy.
- 13.3. This policy and associated policy and procedure are reviewed on an 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 Chief Operating Officer.

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>
There is a named individual who is responsible for the operation of the system	Yes	Head of Facilities	Sept 2025
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	Yes	Head of Facilities	Sept 2025
Staff and members of the RAD are consulted if there is any significant change in the use of CCTV	Yes	Head of Facilities/Head of HR	Sept 2025
Cameras are sited so that they provide clear images	Yes	Head of Facilities	Sept 2025
Cameras have been positioned to avoid capturing the images of people not visiting the premises	Yes	Head of Facilities	Sept 2025
There are visible signs showing that CCTV is in operation.	Yes	Head of Facilities	Sept 2025
Images from the CCTV are securely stored where only a limited number of authorised persons may have access to them.	Yes	Head of Facilities	Sept 2025
The 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	Yes	Head of Facilities	Sept 2025
Except for law enforcement bodies, images will not be provided to third parties.	Yes	Data Controllers	Sept 2025
The potential impact on individual's privacy has been identified and taken into account in the use of the system	Yes	Head of Facilities	Sept 2025
The RAD has a procedure for responding to individuals making requests for copies of their own images. (DSAR Procedure)	Yes	COO	Sept 2025
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes	Circle Fire Service provider	Sept 2025

**Please keep this checklist in a safe place until the date of the next review.**

## **Appendix 1**

The RAD has 36 CCTV cameras covering RAD's premises in the following places:

### **1. Exterior Perimeter (RAD premises)**

- 1.1. South-Main Reception left concourse
- 1.2. South-Main Reception front concourse
- 1.3. South-Main Reception left concourse
- 1.4. Southwest front-Concourse deliveries
- 1.5. West side front-Bike racks & fire escape
- 1.6. West side rear-Bin store & Lecture room fire escape
- 1.7. Northwest Dance School entrance
- 1.8. North-Coda Entrance
- 1.9. North-Dorman Studio fire escape
- 1.10. Northeast-FOE fire escape
- 1.11. West side rear-FOE Fire escape & Bin store
- 1.12. West side front-Delivery entrance & Fire escape
- 1.13. Southwest-Café & Shop entrance

### **2. Internal Ground Floor (RAD premises)**

- 2.1. Reception; Main Reception central
- 2.2. Main Reception East
- 2.3. Main Reception west
- 2.4. Café/Shop corridor
- 2.5. Café back entrance
- 2.6. Lifts
- 2.7. Delivery entrance corridor
- 2.8. Aud Jepsen Theatre front corridor
- 2.9. Library entrance
- 2.10. Library
- 2.11. Library Archive
- 2.12. President Studio B entrance
- 2.13. West fire escape
- 2.14. Corridor 1
- 2.15. Weston Studio corridor
- 2.16. Corridor 2
- 2.17. Corridor 3
- 2.18. Lecture room entrance
- 2.19. Dance School entrance

### **3. Internal First Floor (RAD premises)**

- 3.1. Lift Lobby

### **4. Internal Basement (RAD premises)**

- 4.1. Foyer
- 4.2. Print store
- 4.3. Cycle store

**Author – Facilities Team**

**Policy Review Date: September 2024**

**Next Policy Review Date: September 2025**