

# The Courtauld

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## CCTV POLICY

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### 1. Purpose

- 1.1 Closed Circuit Television (CCTV) images which show a recognizable person, is Personal Data and are therefore covered by the Data Protection Act 2018. This policy therefore confirms how The Courtauld Institute of Art (hereinafter referred to as The Courtauld) conforms with the requirements of the Data Protection Act 2018, the Information Commissioner's Office Code of Practice for surveillance cameras and personal information 2017; the Surveillance Camera Code of Practice November 2021 and The Courtauld's Data Protection Policy.

### 2. Scope

- 2.1 This policy and supporting guidance confirms how The Courtauld manages its CCTV system, determines who has access to CCTV data and under what circumstances and the procedures that will be followed in regard to providing access to CCTV data.

### 3. Responsibilities

- 3.1 This policy is the responsibility of the Head of Estates and Facilities with input from the Director of Governance. Day-to-day responsibility for implementation of the policy is delegated to the contracted Security Manager.

### 4. Procedure

- 4.1 This policy will be reviewed and updated at least once annually normally in the summer period of each academic year by the Head of Estates and Facilities in-consultation with the Director of Governance, Data Protection Officer, contracted Security Manager and others where applicable. The review and any updates made will reflect any changes in legislation and or guidance issued by the Information Commissioner's Office and or amendments to The Courtauld's Data Protection Policy. Amendments to this policy will initially be made by the Head of Estates and Facilities (in-conjunction with the Security Manager where necessary) for review by the Director of Governance (where applicable). Following agreement on updates, a revised version of the policy will be put to The Courtauld's Health, Safety and Wellbeing Committee for formal approval.
- 4.2 A Data Privacy Impact Assessment (DPIA) has been completed for the use of CCTV at the Courtauld. This will be reviewed annually and revised earlier if there is a change in the deployment of CCTV at The Courtauld.

## 5. Equality Implications

- 5.1 There are no known impacts on equality in relation to protected characteristic groups i.e. age, ethnicity, sex, disability, sexual orientation, religion, belief or non-belief, pregnancy or maternity, civil partnerships or marriage or gender identity for both staff and students inspect to this policy.

## 6. Policy Document

### 6.1 Ownership:

- 6.1.1 The Courtauld has in place a CCTV system covering internally and externally The Courtauld's premises located at
- North Block Somerset House – Strand – London – WC2R 0RN
  - Duchy House 2-4 Lancaster Place - London - WC2R 1HG
  - Vernon Square – Penton Rise – Kings Cross – London – WC1X 9EW.

The system is owned by The Courtauld Institute of Art– University of London – Somerset House – The Strand – London - WC2R 0RN and is covered by the Data Protection Act 2018 under The Courtauld's Data Protection registration reference number Z6896909. Images from all cameras' are constantly being recorded and will be used in strict accordance with this policy.

- 6.1.2 The Courtauld's CCTV system does not extend to shared off-site art storage facilities or those areas of Somerset House not under its demise. Any CCTV systems operating in the rest of the Somerset House estate are owned and managed by Somerset House Trust to whom all enquiries should be referred: Somerset House Trust - Strand London WC2R 1LA - Tel: 020 7845 4600, e-mail: [info@somersehouse.org.uk](mailto:info@somersehouse.org.uk)
- 6.1.3 The Courtauld's Head of Estates and Facilities (who may be contacted as detailed below) is responsible for the overall operation and management of the CCTV system and for ensuring compliance with this policy and the operational guidelines which accompany it.

Head of Estates and Facilities	Anthony Tyrrell
Tel:	020 3947 7593
Mobile:	077 774 585156
E-mail:	<a href="mailto:anthony.tyrrell@courtauld.ac.uk">anthony.tyrrell@courtauld.ac.uk</a>

In addition to the above, The Courtauld's contracted Security Manager has day-to-day operational responsibility for the CCTV system via their access to and monitoring of the screens from within the Security Control Room located in the basement of the North Block of Somerset House, with images applicable to Vernon Square also being able to be viewed on a designated screen in the reception of Vernon Square.

Security Manager                      Abdul Arush  
Tel:                                        020 3947 7591  
Mobile:                                  07985 476786  
E-mail:                                  [abdul.arush@courtauld.ac.uk](mailto:abdul.arush@courtauld.ac.uk)

## **6.2. Data Protection Act 2018:**

- 6.2.1 CCTV images which show a recognizable person, is Personal Data and is therefore covered by the Data Protection Act 2018. This policy therefore conforms with the requirements of the Data Protection Act 2018; the Code of Practice for surveillance cameras and personal information 2017; Surveillance Camera Code of Practice June 2021 and The Courtauld's Data Protection Policy.
- 6.2.2 The Courtauld's Data Protection Officer is responsible for The Courtauld's Data Protection Policy.
- 6.2.3 Enquires about The Courtauld's Data Protection Policy should be referred via e-mail to: [dpo@courtauld.ac.uk](mailto:dpo@courtauld.ac.uk)

## **6.3. The CCTV system installed:**

- 6.3.1 The system installed operates 24/7 365 days of the year.
- 6.3.2 The system installed comprises fixed position cameras, monitors, recording equipment and public information signs.
- 6.3.3 Cameras are located at strategic points principally the public entrances and exits to North Block of Somerset House, Duchy House and Vernon Square, foyer areas, gallery rooms, gallery shop, art stores, the library, and IT server rooms and other areas that may warrant an enhanced level of security monitoring<sup>1</sup>. No cameras are positioned so as to be hidden from view and none focus on frontages or rear areas of known private and or other commercial accommodation not occupied by The Courtauld.
- 6.3.4 CCTV signage has been prominently displayed internally at strategic entrance and exit points to The Courtauld's buildings where CCTV is in operation to inform, staff, contracted staff, students, visitors, contractors, members of the public etc. that CCTV is in operation, complete with details of who to contact in case of a query. In addition, further internal signage is displayed where appropriate as a means to reminding building users that CCTV is in operation.
- 6.3.5 Whilst the system installed has been designed to enhance security of The Courtauld's buildings and the collection of paintings, artworks and other

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<sup>1</sup> A location for example where an employee or indirect employee maybe subjected to prolonged periods of lone working and or a location where cash handling occurs

artifacts within, it is not possible for The Courtauld to guarantee that the system will detect every incident and or provide sufficient evidence of every incident taking place within the areas under surveillance.

#### **6.4 Purpose of the CCTV systems:**

6.4.1 The system installed at The Courtauld is for the primary purpose of ensuring the protection and safety of The Courtauld's property, the collection of paintings and artifacts within, workers<sup>2</sup>, students and visitors while consistent with respect for an individual's privacy.

6.4.2 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 possible prosecution of offenders in relation to crime and anti-social behaviour.
- Verify in the case of contracted services, i.e. (but not limited to) security, cleaning, maintenance staff etc. the times they may enter and leave The Courtauld's buildings as a means of monitoring contract compliance. This is because a situation may arise whereby there was reason to believe that contracted hours and or attendance times were either not being adhered to or were being altered without mutual agreement. The use of reviewing CCTV for this purpose would only be considered as a last resort if other means of verification were inconclusive.

6.4.3 The CCTV system as installed will not be used:

- To provide recorded images for publication on the world-wide web and or any other publication medium issued by The Courtauld.
- To record any sound as part of the system recordings.
- To perform covert recording as standard operational procedures.
- To monitor employee attendance.
- To monitor student attendance.

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<sup>2</sup> Workers in the context of this policy means The Courtauld Institute of Art employees, indirect employees, staff working for contractors

## **6.5 Covert recording:**

6.5.1 Covert recording may only be used in the following circumstances on the written authorisation and or request of The Courtauld's Director or their designated Deputy where it has been assessed by at least one further member of The Courtauld's Senior Management Team as listed under Appendix Two including the Data Protection Officer following discussion with The Courtauld's Head of Estates and Facilities or in their absence the contracted Security Manager.

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect serious misconduct (and/or suspected criminal activity as currently stated).
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6.5.2 Where covert recording is sanctioned it will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specified suspected unauthorised activity.

6.5.3 Covert recording will only proceed following receipt of a detailed written request and written approval that confirms the need to use covert recording was considered and confirmed and acceptable.

## **6.6 Control Rooms / Viewing areas:**

6.6.1 Images captured by the CCTV system will be recorded on servers housed in designated server racks located within designated IT server rooms.

6.6.2 Images from cameras can be viewed as real-time images on a monitor located in the server rack at the aforementioned location and on monitors located in the Security Control Room within the basement of the North Block of Somerset House or in the case of Vernon Square on a designated monitor in reception. The monitors viewing these images are not visible outside of the areas in which they are located.

6.6.3 No unauthorised access to the viewing monitors will be permitted at any time. Access will be strictly limited to authorised members of The Courtauld's staff, namely Head of Estates and Facilities, contracted Security Manager and Head of Information Services, Systems and Technology (and those listed under Appendix 3). No other member of staff, regardless of their position and/or seniority, has access to the viewing monitors without either being accompanied and/or in receipt of approval from one of the above named staff.

6.6.4 In cases where it may be necessary to allow other persons to view the monitors the security controller will satisfy himself/herself of the identity of

any visitor and that the visitor has appropriate authorisation. Where visitors are permitted, a detailed log will be maintained which includes their name, their department or organisation they represent, the person who granted authorisation, times of entry and exit and purpose of the visit.

## **6.7 Administration and Procedures:**

6.7.1 It is recognized that images are personal data and subject to the provisions of the Data Protection Act 2018; The Courtauld's Director or their designated deputy is responsible for ensuring compliance with the Act. Where it becomes necessary for images to be burnt to CD-Rom these will be handled in strict accordance with this policy and the procedures set out in the "CCTV Operational Guidelines" contained within " the Security Assignment Instructions jointly written and approved by The Courtauld's Head of Estates and Facilities and senior representatives of the contracted security provider.

## **6.8 Staff with access to the CCTV system:**

6.8.1 Those working at the reception desks or with authorised access to the viewing monitors will be made aware that The Courtauld is recording CCTV images. The Courtauld's Head of Estates and Facilities and or contracted Security Manager will ensure that staff authorised access to the Security Control Room and or reception desk are fully briefed and trained in respect to functions, operation and administrative duties arising from the use of the CCTV system.

## **6.9 Recording:**

6.9.1 The CCTV system installed at The Courtauld's premises uses digital recording technologies only. Recordings are made directly to hard disc which will be automatically over-written every thirty-one days unless there is a legitimate reason to retain any images. Any images needing to be retained will initially be archived to a folder on the CCTV server where the folder will be password protected and retained for 31 days. If there is no cause to retain the images beyond the extended period the file will be deleted. If images do need to be retained for a further period of time, this will be assumed to be for legal reasons and images will be downloaded in accordance with the guidance set out in this policy.

6.9.2 The systems hard discs will only be replaced should they become damaged or inoperable.

## **6.10 Access to CCTV images:**

6.10.1 Access to digital recordings will be recorded in the Access Logbook as specified in the Section titled "CCTV Operational Guidelines" of The

Courtauld's Security Assignment Instructions. Copies of the latter are retained in the security control room, with further copy held on the Facilities shared drive.

6.10.2 Access to digital recordings will be restricted to those staff needing to have access in accordance with the purposes of managing the system as detailed under Appendix 4.

6.10.3 Disclosure of recorded material will only be made to third parties in strict accordance with the purpose 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 or disorder.
- Relevant legal representatives.
- The media (at the request of the Police) 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/incident.
- Service providers contracted to provide services on The Courtauld's premises i.e. security and cleaning companies where it is satisfied they have a "*legitimate interest*" in regards to for example investigating a disciplinary matter concerning one of their employees.

## **6.11 Access to Images by a subject:**

6.11.1 Digital recordings showing a recognisable person is Personal Data as defined under the Data Protection Act 2018. Anyone believing they have been filmed by the system installed at The Courtauld's premises is entitled to ask for a copy of the images recorded, subject to the prohibitions on access also covered by the Data Protection Act 2018. They do not have the right of instant access but must abide by The Courtauld's Data Protection Policy procedures and Subject Access Request (SAR) Procedure.

6.11.2 As The Courtauld's CCTV system uses digital recordings, CD-ROMs can be provided as long as no third parties can be seen. If a third party can be seen then still images of the person requesting the access will be provided but only with all other third party images masked.

6.11.3 A person whose image has been recorded and retained and who wishes

access to the recording must apply in the writing to The Courtauld's Data Protection Officer.

- 6.11.4 Upon receipt of Subject Access Request (SAR), the Data Protection Officer will then arrange for a copy of the recording to be made and given to the applicant. The applicant must not ask another member of staff to show them the recording, or ask anyone else for a copy of the recording. All communications must go through The Courtauld's Data Protection Officer. A response will be provided promptly and in any event within thirty calendar days of receiving the SAR.
- 6.11.5 The Data Protection Act 2018 gives The Courtauld's Data Protection Officer the right to refuse a request for a copy of the recording particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.
- 6.11.6 All Access Requests received will be referred to The Courtauld's Head of Estates and Facilities or in his absence the contracted Security Manager by the Data Protection Officer.
- 6.11.7 If it is decided that an Access Request is not to be complied with, the reasons will be fully documented and the applicant informed in writing, stating the reasons.

## **6.12 Request to prevent access to images:**

- 6.12.1 An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage to that individual.
- 6.12.2 All such requests should be addressed in the first instance to The Courtauld's Data Protection Officer who will provide a written response within twenty-one days of receiving the request setting out their decision on the request. A copy of the request and response will be retained.

## **6.13 Complaints:**

- 6.13.1 It is recognised that workers, students and visitors may have concerns and or complaints about the operation of the CCTV system. Any concerns and or complaints should be addressed in the first instance to The Courtauld's Data Protection Officer. An acknowledgement e-mail will be sent to confirm receipt. Concerns and or complaints will be investigated and formally responded to within twenty-one working days. Should the concern and or complaint take longer than this time period to investigate or address, periodic updates will be forwarded.
- 6.13.2 Concerns and or queries relating to the provision of the Data Protection Act 2018 may be addressed to The Courtauld's Data Protection Officer e-mail: [DPO@courtauld.ac.uk](mailto:DPO@courtauld.ac.uk)



6.13.3 These rights do not alter the rights of staff and or students under any relevant grievance or disciplinary procedures.

**6.14 Compliance monitoring:**

6.14.1 The contact point for workers, students, visitors or members of the public wishing to enquire about the system will be The Courtauld's Head of Estates and Facilities who is contactable between the hours of 09:30 to 17:30 Monday to Friday except public holidays and days when The Courtauld's is official closed. During his/her absence enquiries can directed to the contracted Security Manager.

6.14.2 Upon request enquirers will be provided with:

- A copy of this policy
- An Access Request Form if required or requested
- A copy of the CCTV operational procedures

6.14.3 All documented procedures relating to the operation and management of the CCTV system will be kept under periodical review and The Courtauld's Health and Safety Committee will be kept informed of changes in operational procedures.

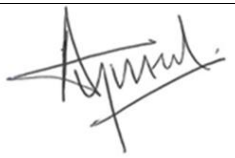
6.14.4 The effectiveness of the CCTV system in meetings its purpose will be kept under review and reports submitted as required to The Courtauld's Health and Safety Committee.

**7. Document Owner and Approval**

The Courtauld's Head of Estates and Head of Estates and Facilities is the owner of this document and is responsible for ensuring that this policy is annually reviewed and updated to comply with statutory guidelines and or other Institute policies and procedures.

A current version of this document is available on The Courtauld web-site.

This policy was updated on 5 July 2024 and is issued on a version controlled basis under the signature of the Head of Estates and Facilities.

Signature: 	Date: 5 July 2024
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## Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial Draft 1	Anthony Tyrrell	24.01.2014
2	Initial Draft 2	Anthony Tyrrell	27.01.2014
3	Initial Draft 3	Anthony Tyrrell	31.01.2014
4	Formal Issue v4	Anthony Tyrrell	11.02.2014
5	Amendments at 6.1.1, 6.3.3, Appendix 2 and 4 insertion of 6.1.2 and renumber of original 6.1.2 to 6.1.3,	Anthony Tyrrell	10.10.2014
6	Amendments at 6.1.3; Appendix 3 and 4 and changes of wording throughout from "The Institute" to "The Courtauld"	Anthony Tyrrell	08.02.2016
7	Name of Security Manager updated at 6.1.3 and job titles at Appendix 3 updated	Anthony Tyrrell	18.03.2016
8	Amendments at 1.1; 6.1.1; 6.1.2; 6.1.3; 6.2.1; 6.3.3; 6.6.1; 6.6.2; 6.6.3; 6.6.4; 6.7.1; 6.8.1; 6.11.1; 6.11.5; 6.13.2	Anthony Tyrrell	20.10.2018
9	Minor updates throughout to add reference to new Security Control Room and removal of reference to Director of Operations	Anthony Tyrrell	24.08.2021
10	Minor updates	Anthony Tyrrell	18.03.2024
11	Minor updates to reflect changes in arrangements in the Vernon Square reception and inclusion of reference to Director of Governance	Anthony Tyrrell	02.07.2024

## APPENDIX 1

The Courtauld's, demised area. Any cameras or associated equipment located outside of the demised area with reference to The Courtauld's premises at Somerset House is not covered by this policy and any queries pertaining to such equipment should be deferred to the Data Controller at Somerset House Trust – The Strand – London – WC2R 1LA e-mail: [info@somersethouse.org.uk](mailto:info@somersethouse.org.uk)

## APPENDIX 2

The Courtauld's staff permitted to access and thus, approve a request for convert recording in conjunction with the Data Protection Officer and the Head of Estates and Facilities and or contracted Security Manager are:

- Associate Dean and Deputy Director
- Head of The Gallery
- Chief Operating Officer
- Director of Governance

## APPENDIX 3

Those persons authorised to have access to **real-time** images or recorded data for the purposes of reviewing an incident and or gathering evidence in respect of an incident are.

- Academic Registrar
- Chief Operating Officer
- Head of Estates and Facilities
- Head of Information Services, Systems and Technology
- Head of People
  
- CIS Security Manager
- CIS Duty Controllers and Senior Security Officers assigned to the premises
  
- Officers from the Metropolitan Police

In addition to the above, system engineers from WLS Limited the current maintenance provider are permitted access to real-time images only during the course of carrying routine planned maintenance and upgrading of the system installed.

## APPENDIX 4

Those persons authorised to access hard drives for purposes of searching images and recording to CD-Rom, for evidence gathering following authorisation from the Head of Estates and Facilities are

- CIS Security Manager or nominated CIS Duty Controller and or Senior Security Officer holding a SIA CCTV License