

The RCP CCTV Policy

January 2023

1. Ownership

The Royal College of Physicians operates a CCTV surveillance system (“the system”) throughout the estate, with Images being monitored and recorded on site. The system is owned and managed by the College and operated by College Security.

The responsible manager is the College Bedell.

2. Compliance

Images obtained from the system which include recognisable individuals constitute personal data and are covered by the Data Protection Act. This Policy should therefore be read in conjunction with the College’s Data Protection Code of Practice.

The Bedell is responsible for ensuring compliance with the Act.

This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner’s CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

3. Purpose

The College’s registered purpose for processing personal data through use of the system is crime prevention and/or staff monitoring. This is further defined as:

CCTV is used for maintaining public safety, the security of property and premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties. For these reasons the information processed may include visual images, personal appearance, and behaviours. This information may be about staff, customers and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, court or tribunal, security organisations and persons making an enquiry.

The operators of the system recognise the effect of such systems on the individual and the right to privacy.

4. Description

The system is intended to produce images as clear as possible and appropriate for the purposes stated. The system is operated to provide when required, information and images of evidential value.

Cameras are located at strategic points throughout the College estate, principally at final exit points of buildings and public and non-public collection spaces. A full list of cameras is held in Security Assignment Instructions (AIs)

Signage is prominently placed at strategic points on the estate to inform staff, visitors, and members of the public that a CCTV installation is in use and includes contact details for further information.

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5. Operation

Images captured by the system are recorded continuously and may be monitored in the Security post or at reception. Whilst not being monitored images are not to be left running on the screen. Both systems are password protected.

All Security staff working at The College are made aware of the sensitivity of handling CCTV images and recordings. The Bedell and Security management will ensure that site Security Officers are fully briefed and trained in all aspects of the operational and administrative functions of the system. Only Security staff on site have responsibility for operation of the system.

Detailed procedures for the management of the system are given to all Security staff whilst being given their onsite training.

6. Information retention

No more images and information shall be stored than is required for the stated purpose. Images are deleted automatically after 29 days. Information used as a reference database for matching purposes will be accurate and kept up to date.

7. Access

Access to images is restricted to those who need to have access in accordance with this policy, the SOPs and any governing legislation.

Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with the Data Protection Act.

Anyone who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by the Data Protection Act ("Subject access request"). Data subjects also have the right to request that inaccurate data be corrected or erased and to seek redress for any damage caused. Procedures are in place to ensure all such access requests are dealt with effectively and within the law. Access requests should be addressed to;

Nigel.Crowdy@rcp.ac.uk or by letter to:

The College Bedell

The Royal College of Physicians

11 St Andrews Place

Regents Park

London, NW1 4LE

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8. Covert recording

Covert cameras may be used only in very limited circumstances. This requires the written authorisation of the Head of Property Services, The College Bedell and, where this may involve members of staff, the Head of Human Resources.

Covert surveillance may be carried out in cases of suspected specific criminal activity only where the objective of making the recording would be seriously prejudiced should the individual(s) concerned be informed of such surveillance.

Any authorisation to use covert surveillance must include a justification of the need to use such methods to obtain evidence of suspected criminal activity in a specific case; an assessment of alternative methods of obtaining such evidence and a statement of how long the covert monitoring should take place. The authorisation must be reviewed every 28 days and consider whether that should continue or be closed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

9. Feedback

Members of the public should address any concerns or complaints over use of the College's CCTV system to Nigel.Crowdy@rcp.ac.uk or by telephone to the Bedell on 02030751537. College staff should address any enquiries or concerns relating to the system to their line manager in the first instance.

10. Annual review

This policy will be reviewed annually by the Bedell and Security contractor to ensure that the purpose still applies.

This Policy document rests with Property Services.

Next scheduled review – January 2024