



Internal CCTV Code of Practice



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Refreshed by the Community Safety team
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**WEST LANCASHIRE BOROUGH COUNCIL
CCTV SURVEILLANCE SYSTEM**

CODE OF PRACTICE

1.0 INTRODUCTION

- 1.1 West Lancashire Borough Council has installed a comprehensive CCTV Surveillance System across the Borough. Fibre optic cameras have been installed in Ormskirk town centre and a number of microwave and broadband cameras have been installed in other locations. One hundred and six public open space cameras are operational and they are monitored at a Central Control Room.
- 1.2 Management responsibility for the CCTV scheme falls under the remit of the Council's Community Safety staff within the Environmental Protection and Community Safety section of the Leisure and Environment Directorate.
- 1.3 Maintenance of the scheme and monitoring of the images are both carried out by 3rd parties, under contracts from the Council.
- 1.4 The system is monitored 24 hours each day, 7 days per week. Either one or two members of staff, depending on operational requirements, undertake the monitoring and the associated administrative duties.
- 1.5 This Code of Practice, which has been agreed with the Council's monitoring contractor, has been prepared for the guidance of Council staff, Councillors and the operators of the system. It details how the suite operates and how images are managed.
- 1.6 This internal Code of Practice also reflects the requirements of relevant legislation, National Codes of Practice and guidance. These include: The Home Office Surveillance Camera Code of Practice, the Information Commissioner's Office Data Protection Code of Practice for Surveillance Cameras and Personal Information, s.163 of the Criminal Justice and Public Order Act 1994, the Protection of Freedoms Act 2012, the Freedom of Information Act 2000, the Human Rights Act 1998, the Data Protection Act 2018, the Regulation of Investigatory Powers Act 2000, the Criminal Procedures and Investigations Act 1996, the Police and Criminal Evidence Act 1984, section 17 of the Crime and Disorder Act 1998 and the General Data Protection Regulation 2018.
- 1.7 This document should also be read in conjunction with the Council's annual CCTV report(s), which provides more background information on the system and the cameras themselves. Reports from 2013/14 until the current time are available within the Community Safety pages of the Council's website, www.westlancs.gov.uk.

2.0 STATEMENT OF PURPOSE

2.1 The Home Office Surveillance Camera Code of Practice (“*The Code*”), details that the use of a surveillance camera system must always be for a specified purpose, which is in pursuit of a legitimate aim and necessary to meet an identified pressing need. As such,

The West Lancashire Borough Council scheme is operated in relation to the Prevention of Disorder or Crime and the reduction of the fear of crime. Additionally, it may be used in relation to Public Safety.

2.2 The public interest and confidence in the operation of the scheme will be recognised by ensuring the security and integrity of operational procedures. This Code of Practice forms part of the contractual relationship with the monitoring contractor and periodic contract monitoring/management meetings take place between WLBC and the Contractor.

3.0 GUIDING PRINCIPLES

3.1 *The Code* states at 2.6 that system operators should adopt 12 guiding principles. Appendix A lists these 12 principles and also comments regarding WLBC's compliance.

4.0 PARTNERSHIP

4.1 The approved partners in this CCTV scheme are West Lancashire Borough Council and its recognised statutory Community Safety Partners, with operational activity principally undertaken by Lancashire Constabulary.

5.0 KEY OBJECTIVE

5.1 The objective of the CCTV scheme is to provide a safe and secure public environment for the benefit of those who live, work, visit, service and enjoy the facilities of the area. This objective will be carried out by the monitoring of the system, so as to assist in the prevention of disorder or crime. This will also aim to

- Reduce the fear of crime in the community.
- Assist in the detection of crime.
- Act as a deterrent to those who may potentially be involved in crime.
- Facilitate the apprehension and prosecution of offenders in relation to crime and public order.
- Improve communication and the operational response of police patrols in and around Ormskirk Town Centre and other outlying areas using appropriate communications equipment.
- Assist in developing community confidence.

6.0 **CONTROL CENTRE SYSTEM MANAGEMENT**

6.1 Hours of Operation

The Control Centre is operational and manned 24 hours per day, 7 days per week, 365 days per year.

6.2 **Access**

6.2.1 The suite doors will be secured at all times using the existing keyless access facilities.

6.2.2 All external doors to the suite are kept locked at all times. Controllers must satisfy themselves over the identity of any callers and the purpose of the visit before allowing access. CCTV cameras cover the access to the CCTV suite. CCTV operators must ensure all visitors complete the visitor's logbook by signing in and out of the suite and entering the time of entry and departure.

6.2.3 Access to the suite will be strictly limited to the designated service provider staff and authorised Control Operators, authorised management from the Council, Police Officers (including PCSOs) and appropriate authorised visitors.

6.2.4 Particular arrangements will apply to visitors and contractors as outlined in 6.3 and 6.4 below.

6.2.5 The CCTV Operating Room is a controlled separate work area within the Monitoring Suite.

6.3 **Visitors**

6.3.1 There is a great deal of interest in the CCTV system and it is important that operations are managed with the minimum of disruption. Casual or unplanned visits will not be permitted. Visits are by appointment only. The contractor should be given 24 hours' notice if appropriate visitors are to be brought to the suite.

6.4 **Contractors**

6.4.1 Out of hours and emergency attendances may arise. In all circumstances the Operator must be satisfied as to the identity and purpose of the contractor before allowing entry. Prior telephone or email arrangements to seek access will be the normal method of contact and must be followed if time permits.

7.0 **CONTROL ROOM ADMINISTRATION AND PROCEDURES**

7.1 **Control Room Administration**

7.1.1 The monitoring operatives will confirm the effectiveness of the CCTV system and network twice per day and any issues will be recorded on the daily

system check sheet. Any defects will be reported for repair as per agreed contract maintenance arrangements.

7.1.2 The incident log must be maintained throughout operation. Brief details of incidents should be noted together with the action taken and initial results. Incidents that should be noted will be as per the operational requirements. For guidance, where a crime has been observed or it can reasonably be predicted that an intervention will prevent one (or an escalation) the matter should be referred to the Police and recorded in the daily occurrence book. The identity of telephone callers and responders should always be established and noted.

- 7.1.3
- (a) A visitor book will be maintained in the Control Room. The book specifically states “in signing this book, all visitors acknowledge that any personal data they are exposed to is, and must remain, confidential”. All authorised visitors and contractors are required to complete the book in the interests of Security, Fire and Health and Safety Regulations. The purpose for visiting the control room must be stated in writing.
 - (b) The daily occurrence book for the use and reviewing of hard drive images / discs will be completed on each shift. Continuity must be maintained, especially for evidential purposes.
 - (c) Hard drive images / discs will be reviewed at the request of the Police or Council management when practical. Reviews by Police officers will be carried out in the separate reviewing room.
 - (d) Other administration functions will include filing, maintaining incidence logs, fault reporting and appropriate work on archive storage.
 - (e) Monitoring staff will link into and when necessary operate the shop-watch and Airwave radio networks and take appropriate action based on information received and log all appropriate action(s) as per 7.1.2.

7.2 **Communications**

7.2.1 Under normal circumstances all communications to Police Officers regarding incidents will be made through Police Communications Officers using agreed protocols.

7.2.2 Emergency procedures will be used in appropriate cases to call Fire Brigade or Ambulance services.

7.2.3 In addition, liaison with other agencies may be necessary and must reflect agreed partnership protocols.

7.3 **Training**

7.3.1 Only trained staff are allowed to operate the equipment in the monitoring suite. Training by camera installers will be provided, if necessary. All staff that successfully complete an induction must be trained up and certified in accordance the Securities Industries Act 2001. Evidence of certification and training is available on request.

7.4 **Recording**

7.4.1 The Control Room system is supported by digital hard drives which provide instant operation, live viewing and real time recording of images.

7.4.2 Images stored on the hard drive can only be retained for a maximum of 31 days from the last date of recording. The images are automatically deleted. Images requested for evidential purposes will be archived to prevent loss.

7.5 **Liaison**

7.5.1 Contract liaison meetings take place with maintenance and monitoring contractors. Suggested improvements will be considered, if made. If necessary, Council officers will meet with the monitoring and maintenance contractors and the Police to ensure appropriate service delivery and any necessary improvements in partnership working arrangements.

7.5.2 Changes to policies, procedures and protocols must be agreed and approved under this partnership arrangement requiring the consent of relevant operational partners.

8.0 **CONTROL AND USE OF CAMERAS (INCLUDING RELEVANT PROVISIONS OF THE REGULATION OF INVESTIGATORY POWERS ACT 2000 (RIPA)).**

8.1 At least one trained operator must be present within the Control Room at all times. Camera surveillance will be maintained throughout.

8.2 Every camera has pre-set locations whereby it can see, in general terms, portions of the whole of the area under surveillance. Pre-set patrols should only be deviated from where necessary in relation to the statement of purpose, as detailed below.

8.3 The Council's Public Open Space Cameras are not covert cameras, they are sited in public places and their locations have been published in the annual report referred to at 1.7. "The Code" states that "An individual can expect to be the subject of surveillance in a public place as CCTV is a feature in places that the public frequent". The Council also has signage in areas where its public open space cameras operate and will enhance this as the coverage expands.

8.4 The Regulation of Investigatory Powers Act 2000 (RIPA) regulates covert and directed surveillance

- Covert Surveillance is that carried out in a manner calculated to ensure that subjects of it are unaware it is or may be taking place.
- Directed surveillance occurs if covert surveillance is undertaken:
 - a. For the purpose of a specific investigation or specific operation.

- b. In such a manner as is likely to result in the obtaining of private information about a person (whether or not one is specifically identified for the purposes of the investigation or operation; and
- c. Otherwise than by way of an immediate response to events or circumstances the nature of which is such that it would not be reasonably practicable for an authorisation to be sought for the carrying out of the surveillance.

8.5 The Council's cameras can occasionally be used for directed surveillance. This will generally be for the Police, however, could be in relation to one of the Council's functions, if the investigation relates to an offence which carries a maximum sentence of 6 months or more. Pre-planned directed surveillance will **only** take place if the operators are satisfied that they have an appropriate RIPA authorisation. These will be signed off by a senior officer from the police or by a magistrate for the Council. The authorisation will ensure that the operators are operating the Council's system in compliance with RIPA. The operators will not perform pre-planned directed surveillance without an appropriately signed RIPA authorisation. Copies of all RIPA authorisation forms will be kept at the suite and are available if necessary. If the Council obtains an authorisation, the original forms are stored in the Council's Central Register within Legal and Democratic Services.

8.6 RIPA does contain a provision that immediate responses to incidents do not require authorisation. The Home Office gives the example of an immediate response to something happening during the course of an operator's work, which is unforeseeable. On noticing or being alerted to an incident, operators will focus cameras on an area and if necessary follow suspects or perpetrators, whilst alerting the Police.

8.7 The control of the system will remain with the Council unless a major incident occurs and, in order to prevent disorder or crime, the Police request control in order to:

- Monitor potential public disorder or other major security or emergency situations.
- Assist with the deployment of resources.

On each occasion this occurs, a detailed record of the request(s) for individual camera control must be made in the daily occurrence book.

8.8 In the case of major incidents, the Police may assist in the managerial control of the Control Room. This will be subject to a formal request being made to the Council's Chief Executive (or her nominated deputies; the Director of Leisure and Environment, the Director of Housing and Inclusion or the Director of Development and Regeneration Services) and approval being given. In these situations the controls will be handled by the duty controllers, under Police instruction, to maintain maximum efficiency.

8.9 In extreme cases, the Police may require sole occupation of the Control Room. Approval must be requested and received from the Chief Executive (or nominee) and the procedure for this is attached at Appendix B. The request for approval must be made by a high ranking Senior Police Officer and

confirmed as soon as possible in writing. If this situation arises the Police will become the “Data Controller” for the duration of the occupation and will have full responsibility for what is viewed, recorded and transferred to disc. Full details of the timings of such an incident will be included in the daily occurrence book.

- 8.10 In the circumstances when operational problems are anticipated during any part of a shift, to assist communications, arrangements may be made for a Police Officer (or PCSO) to be present within the CCTV Control Room for liaison purposes. This will normally apply for the duration of the incident and be subject to the arrangements made by the Police Control Room Supervisor or Duty Officer. This scenario can only occur with the agreement of the Council’s Environmental Protection and Community Safety Manager or his nominated deputy (Community Safety Officer).
- 8.11 Where the circumstances detailed in 8.8, 8.9 or 8.10 arise, appropriate records shall be kept in the incident log by operatives.
- 8.12 With the exception of the circumstances listed above, the controls must only be operated by authorised trained Control Room staff. Any staff training must be supervised and documented at all times.

9.0 **REVIEWING IMAGES/PROVIDING INFORMATION**

- 9.1 The Council will receive requests from time to time for images to be reviewed and possibly provided or for information about images to be released. Principle 7 of the Home Office Surveillance Camera Code of Practice states **“Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images should only take place when it is necessary for such a purpose or for law enforcement purposes”**.
- 9.2 As a result, the Police can ask for footage to be retrieved or can review it themselves, in relation to a crime. Images and information will therefore normally only be released to the Police. Whilst Council staff have a delegation to release images/information, this should only be to assist the Police.
- 9.3 The Code also states that “there may be other limited occasions when the disclosure of images to a third party, such as a person whose property has been damaged, may be appropriate”. However, in order to prevent any unfair intrusion on others, any other provision of information/images will only be to an authorised body acting on behalf of their client, such as an insurance company. Such requests will be considered on their merits by the Council’s Environmental Protection and Community Safety Manager or his nominated deputy, in line with all relevant guidance.
- 9.4 All requests for an image review must be made to the Council’s Environmental Protection and Community Safety Manager or his nominated deputy, via community.safety@westlancs.gov.uk and will be considered. These requests will be logged by the CS team and approved requests will be recorded in the Operator's Log, together with the response to the request.

When a review has been completed, the result of that review should be recorded in a review request log.

The following information should always be recorded:

- The date and time the request was made
- The date, time and location of the incident being investigated
- A brief description of the incident being investigated
- Who made the request and copies of any written authority's
- The name and signature of the person making the request or person attending and his authority
- The Operator's response
- The results of the review
- The date and time the results were passed back to the enquirer
- Daily occurrence book number (if applicable)
- Police log number (if applicable)

9.5 It will be a matter for the Operator to exercise some discretion but one of the following options should be taken:

- If time permits the review should be carried out immediately.
- If the review cannot be undertaken immediately because the Operator is busy with normal surveillance, the person requesting the review should be advised that the review will take place but it will have to be when time permits as soon as practically possible.
- If an Operator is going to pass on a request for an incident to be reviewed to a later shift, he must note in his log bullet points 1 to 5 from 9.4 and ensure that the next Operator is fully aware of the request and what is required. The next Operator should complete bullet points 6-10 in his Log and in the image Review Log.

9.6 Any request received from internal Council Departments should be dealt with by the Environmental Protection and Community Safety Manager in the first instance. Issues of debate and clarity will be referred to the Director of Leisure and Environment or the Borough Solicitor.

9.7 Whilst there is often interest in the suite from the media, WLBC will not agree to any filming in the suite or the use of any images for entertainment purposes.

10.0 **DATA PROTECTION**

- 10.1 The Information Commissioner's Office (ICO) issued its first Code of Practice under the Data Protection Act 1998 (DPA) covering the use of CCTV in the year 2000. In October 2014 a revised version was produced and it provides good practice advice and recommendations on how the legal requirements of the DPA can be met. The DPA applies to information captured by surveillance systems and any organisation using cameras to process personal data should follow the recommendations of the code. Surveillance systems are used to record and/or monitor the activities of individuals. As such they process individual's information – their personal data.
- 10.2 The DPA places considerable responsibility on the "Data Controller" of CCTV to comply with the DPA by following a Data Protection Act CCTV Code of Practice. For WLBC the "Data Controller" will be the Director of Leisure and Environment, or in their absence the Environmental Protection and Community Safety Manager. Anyone processing personal data must comply with the eight enforceable principles of good practice as set out in the DPA. As well as creating obligations for organisations, the DPA also gives individuals certain rights, such as the right to access their personal information and to claim compensation when they suffer damage. Both the Data Protection Act 2018 and the General Data protection Regulation 2018 have now been enacted and as a result specific amendments have been made to the CoP.
- 10.3 **Subject Access Requests (SAR)** – Individuals whose information is recorded (i.e. their personal information), have a right to be provided with that information or, if they consent to it, view that information. If an individual requests footage of themselves *under an SAR*, the Council will ask them for sufficient information to allow that individual to be identified; this will include
- The date and time, the camera location(s), or area and sufficient details that will assist us to recognise them on the footage. A passport or photo driving licence will be acceptable for such purposes and will assist to confirm their identity.
- 10.4 If sufficient information is provided to comply with the request, the Council will identify if viewing the footage is enough, or will provide the information on a disc. Full details of the request, information provided and the result of the request will be recorded.
- 10.5 Where necessary, to prevent the identification of 3rd parties, the Council will employ a specialist company to obscure other persons from any footage viewed or provided and thus prevent the personal data of other individuals from being released.
- 10.6 If the Council has already provided footage to for example the Police, who have then become the "data controller" for the information, it will not provide further copies of the same footage to an individual.
- 10.7 Where necessary, advice will be sought from the Council's legal staff in relation to any SARs received. All requests will be logged.
- 10.8 **Freedom of Information Act (FOIA)** – The ICO Code of Practice indicates that it is likely that requests for footage made under the FOIA will be exempt

under section 40, as they will cover personal information about either the individual concerned, or another person. It is therefore unlikely that this information should be disclosed. As such, these requests will be reviewed on an individual basis and advice will be taken from the Council's legal team.

11.0 **PRIVACY**

11.1 The WLBC scheme will be operated with due regard to the privacy of the individual.

11.2 Across the Borough, the occupiers of certain properties have requested that privacy settings should be applied and as a result those properties (or parts of them) appear blanked out. None of these settings should be removed without the written consent of the Environmental Protection and Community Safety Manager.

11.3 Where requests for privacy settings arise, the settings should be applied by the contracted engineer, under the supervision of the CCTV Supervisor and logged in the daily occurrence book. Where necessary a "screen shot" of the pixelated image should be provided to the occupier.

11.4 As part of any public consultation exercise for new camera locations, comments regarding privacy will be considered and privacy settings will be used as necessary. The Council's Annual CCTV report and the associated publicity also encourage comments/suggestions to be made in relation to privacy.

12.0 **HARD DRIVE / CD PROCEDURES**

12.1 **Access to CD's/ Images**

12.1.2 Usually the external source of request for CDs and/or images will be from the Police. Police requests will arise in a number of ways including:

- (a) Regular/daily requests for a review of recordings in order to trace incidents that have been reported.
- (b) Immediate action relative to 'live' incidents, e.g. immediate pursuit.
- (c) For major incidents that occur when the system may be recording continuously.
- (d) Individual Police Officer seeking to review images in the designated viewing room.

Subject to the approval of the Environmental Protection and Community Safety Manager, or his nominated deputy, the only internal sources of requests for images are likely to be from:

- (a) Senior management in various Council departments.

12.2 **Control and Distribution of CD's**

- 12.2.1 It is essential that the following procedures for the use and retention of CD's are strictly adhered to in order to preserve the facility to use them in any future proceedings:
- The Operator should register the identity, date and time of CD insert including CD reference.
 - The date and time of the ejection of the CD from the recorder must be noted in the log.
 - The operator must mark the CD for identification purposes using the agreed referencing system.
 - The CD must be placed in the specified envelope, sealed, witnessed, signed by the Controller and dated.

12.2.2 If handed to the Police or other authorised party the handover **must be noted in the log** and the details and signature of the recipient obtained. CDs that may be required by the Police are to be retained separately and securely until it is confirmed that they are not required for evidential purposes.

12.3 **Release of CD/ Images**

12.3.1 A record is to be maintained of the release of CDs to the Police or to other authorised applicants. A register is available for this purpose.

12.3.2 Once a set of images has been released to an external organisation, they will automatically become the "data controller" for that information. If discs are returned to the Council for certified disposal after usage, they will be shredded and records of any shredding will be available.

12.3.3 The Director of Leisure and Environment can (in consultation with the Borough Solicitor), under certain circumstances, authorise the release of CCTV images. Additionally, the Council currently has a Committee which can determine whether to release images of convicted persons. To ensure compliance with the General Data Protection Regulation 2018 and the Data Protection Act 2018 legal advice will be given to this Committee.

12.4 **Photographs**

12.4.1 Photographs must only be used to assist the identification of incidents, during staff training, and for demonstration purposes. Photographic material may only be provided to authorised officers for specific and relevant purposes as defined in this Code of Practice.

12.4.2 Photographs will be supplied to the Police only upon written authorised request and a record of photograph requests is maintained.

12.4.3 A file of duplicate photographs is to be maintained showing appropriate references and relevant authority.

12.5 **CD Storage**

- 12.5.1 CDs will be stored in lockable fireproof cabinets in a separate secured area with restricted and controlled access.
- 12.5.2 A log of all CD movements will be maintained.
- 12.5.3 CD disposal and shredding will be under specific controlled arrangements.

13.0 **WRITTEN REPORTS**

- 13.1 Operators may be requested to complete a Pro-forma evidence statement for the Police to complete the chain of evidence.
- 13.2 Only in exceptional circumstances and with agreement from the Contractors' management representative will a personal statement be allowed.

14.0 **SAFETY PROCEDURES**

14.1 The Control Centre Suite operates the following fire safety procedures:

- Each Tuesday morning there is a fire system check
- Any other fire detection activation requires notification of the senior Manager on site or on standby and evacuation and/or if instructed by a senior Fire Officer or Police Officer on site

14.2 **Personal Safety**

- 14.2.1 If any operator feels threatened, is concerned about their health or suspects intrusion from an unauthorised source they are instructed to operate the onsite lone-working system alarm. These are monitored independently of the Control Centre and tested every evening. Records of this testing are kept. The suite is also linked directly to the Lancashire Police communications team via "Airwave" radio.
- 14.2.2 If an operator is approached out of work in relation to their work duties they should notify the Police at the earliest available opportunity.

14.3 **Management Support**

- 14.3.1 The Control Centre Suite has management support through nominated Officers either on site or through mobile telephones.

14.4 **Support Arrangements**

- 14.4.1 The Control Centre Suite has immediate access to a telephone and e-mail facilities.

15.0 **COMPLAINTS**

15.1 Any complaints in respect of the CCTV operation are to be dealt with under the Council's existing complaints procedures. In the first instance they should be directed to the Council's Environmental Protection and Community Safety Manager or his nominated deputy, via community.safety@westlancs.gov.uk.

16.0 **ACCOUNTABILITY**

16.1 West Lancashire Community Safety Partnership will be informed as to significant changes or issues in relation to the operation of the system.

16.2 West Lancashire Borough Council monitors financial and operational activities.

16.3 An annual report, including performance information will be produced by WLBC.

17.0 **REVIEW OF CODE OF PRACTICE**

17.1 The Code of Practice shall be regularly reviewed to ensure that it still meets requirements. The review should take place at least at bi-annual intervals, or on any occasion amendments are deemed to be necessary.

18.0 **Copyright**

18.1 The copyright on all CDs and recordings rests with West Lancashire Borough Council. The express permission of the Director of Leisure and Environment or his nominee will be required prior to the release of any material to the media or any third party organisation. Any unauthorised release will be treated as a serious breach of discipline and will result in immediate dismissal.

19.0 **AUDIT**

19.1 An audit of these procedures and associated activities will be undertaken on a random basis and records of any audits will be kept.

19.2 Breaches of this code will be investigated by the Council's Audit Section immediately and urgent remedial action taken to resolve matters as appropriate.

20.0 **INDEPENDENT INSPECTION**

20.1 Independent inspection can be carried out by the Surveillance Commissioner.

21.0 **SURVEILLANCE CAMERA CODE OF PRACTICE COMPLIANCE**

21.1 In November 2015 The Surveillance Camera Commissioner launched a scheme that enables organisations complying with the Surveillance Camera Code of Practice to be independently audited providing credibility and transparency to claims of compliance. On the 14 June 2016 the Council was awarded full certification which lasts for a period of 5 years. In order to ensure

the certification is still valid, each year a desk top exercise is undertaken with the accredited body. In 2017 and 2018 the exercise was undertaken satisfactorily with the accreditation still being valid.

- 21.2 Obtaining the full 5 year certification demonstrates the Council's compliance with the Surveillance Code of Practice and evidences good practice. Certification also provides reassurance to the community that the Council's public open space CCTV scheme is managed appropriately; the information gathered from the cameras is used in an appropriate manner and in accordance with the Surveillance Code of Practice guidelines. This Code of Practice assists in the Council demonstrating compliance.

Appendix A – 12 Guiding Principles.

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
Comment – see 2.1
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
Comment – see 11.0
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
Comment – see 15.0 and 16.0
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
Comment – see 15.0 and 16.0
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
Comment – This CoP demonstrates compliance
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once its purpose has been discharged.
Comment – see 7.4.2
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
Comment – see 8.0, 9.0 and 10.0
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
Comment – see 7.5.1
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
Comment – These are in place.

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

Comment – see 17.0, annual reports are produced

11. When the use of a surveillance camera system is in pursuit of a legitimate aim and a pressing need, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.

Comment – see 2.0

12. Any information used to support a surveillance camera system which matches against a reference database for matching purposes should be accurate and kept up to date.

Comment – systems such as facial recognition software are not used.

APPENDIX B

PROCEDURE FOR SOLE OCCUPATION / MANAGEMENT CONTROL OF THE CONTROL ROOM BY POLICE

- 1.1 In the event that the Police require sole or controlled occupation of the Control Room the request must be made directly to the Council's Chief Executive or her nominee by the most senior Police Officer on the duty shift.
- 1.2 There must be a significantly important reason for this request to be made which must be confirmed in writing as soon as practicable.
- 1.3 The CE or her nominee will then personally issue instructions to the Control Room staff to advise them of the situation.
- 1.4 It is not possible to identify all the circumstances in which this request will be made but generally it would fall into the following broad categories:
 - National Security
 - Royal Protection Duties
 - Fire Arms or Suspected Fire Arm Matters
 - Major / Serious Crime
 - Other Declared Major Incidents