

# Closed Circuit Television (CCTV) Code of Practice

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## **Introduction**

This code of practice applies to the CCTV surveillance scheme operated by us (West Suffolk Council). The scheme comprises cameras located at specific external and internal locations within the surrounding area.

The scheme allows for the control, monitoring and recording of images for the purposes of crime detection and prevention.

All cameras have been sited to capture images of identifiable individuals or information relating to individuals which are relevant to the purposes for which the scheme has been established.

In 2013, a new Surveillance Camera Code of Practice was published by the Home Office; this aims to create a more transparent, proportionate and accountable CCTV system.

To assist organisations in achieving the aims set out by the camera code of practice, the Home Office also published a Code of Practice – Steps to complying with the 12 principles. If followed correctly, these principles will protect the public, as well as uphold civil liberties.

We work to comply with these practices and have conducted a privacy impact assessment (PIA) to outline precisely what our system entails and what it is being used for. This is to allow transparency, proportionality and accountability as outlined in the Surveillance Camera Code of Practice.

To access the privacy impact assessment, visit the webpage [https://www.westsuffolk.gov.uk/community/crime\\_and\\_safety/cctv.cfm](https://www.westsuffolk.gov.uk/community/crime_and_safety/cctv.cfm)

The areas that we cover are:

- Brandon
- Bury St Edmunds
- Haverhill
- Mildenhall
- Newmarket
- Stowmarket.

## **Ownership of system**

We own and manage the system and operate cameras for ourselves, as well as Mid Suffolk District Council and Suffolk County Council.

## **Scheme objectives**

The objectives are:

- to reduce fear of crime
- to improve conditions for local residents and visitors to town centres, especially vulnerable groups, including elderly people and children
- to support businesses, increase confidence and invest in local communities, thus improving facilities and retail outlets for the community

- to dispel avoidance factors affecting town centres
- to deter crime and vandalism
- to assist in the detection of crime
- to reduce the level of crime
- to aid the efficient and effective deployment of police resources
- to achieve these aims while respecting the civil liberties of residents and visitors.

## **The purpose of public space surveillance (PSS) systems**

When CCTV systems are initially designed, each camera should have an operational requirement that specifies the purpose of that camera and the response that is expected from the operators. This information can be found within the council's privacy impact assessment.

The purpose of a CCTV system is documented in both the CCTV Code of Practice and the General Data Protection Regulation (GDPR). All PSS CCTV systems are registered with the Information Commissioner and their purpose can be broadly described under two categories:

- primary purpose
  - to assist in the prevention and detection of crime
  - to assist in the promotion of community safety and to reduce anti-social behaviour
- secondary purpose
  - to assist the client (system owner) in providing any of its prosecuting or contracted services
  - to assist in the management of the town centre – this includes monitoring safety or operationally critical activities on a particular site
  - to assist the client in the protection of assets.

## **Roles and responsibilities of a CCTV operator**

The role of a CCTV operator is one of today's most high profile security positions. CCTV operations has become one of the most important sectors of the security industry. However, the quality of information obtained is only as good as the operators that monitor the cameras. The industry has made considerable technological advances in recent years which mean that the skills of a CCTV operator are developing on a continuing basis. Higher expectations are being placed on systems and operators to help with major crimes such as murder and terrorism, with anti-social behaviour on our streets also increasing the need for greater vigilance. As a result, a CCTV operator's responsibilities have increased to deliver the quality of service and evidence that is required to provide evidential material of the highest integrity.

## **Licence to operate**

All personnel operating within the CCTV control room must be vetted to comply with Non-police personnel vetting (NPPV) Level 2 to operate the airwaves and be in possession of an Security Industry Authority (SIA) CCTV licence which authorises them to operate a CCTV camera for public space surveillance (PSS). The training standards set out for these licences are governed by the SIA which is the issuing authority of all CCTV operator's licences.

SIA website: <https://www.sia.homeoffice.gov.uk/Pages/home.aspx>

## **Location and access**

The control room is situated in West Suffolk House, Bury St Edmunds. It houses the main control equipment for the system and has its own separate access, which is protected by both access control and a camera to identify persons before entry is allowed. The actual control room will be a secure unit at all times, with further access control.

Visitors will be strictly limited. Only authorised persons with the express permission of the supervising officer will be allowed entry. A police officer will be allowed access when authority has been provided by the local police control room supervising officer. Visitor logs will record all visitors and operators entering or leaving the control room and will record the reason for the visit.

## **Deployment and use of cameras**

With the exception of a few static or fixed cameras, all cameras controlled through the CCTV control room at Bury St Edmunds are the type commonly known as pan-tilt-zoom (PTZ) cameras and controlled by the operator by use of a 'joy stick' on the control console.

- Pan – can be moved from left to right through 360 degrees.
- Tilt – can be moved up or down.
- Zoom – enables the operator to view close up images to obtain greater detail or panoramic.

When cameras are not being operated by an operator, they run through a pre-set tour, giving a 360-degree view of the area to capture anything that may be used later in evidence.

## **Siting of cameras**

When siting a camera, consideration should always be given to the camera's pre-sets, its parking position and choke points. Once agreed upon, they should not be changed except for when it becomes operationally necessary.

On a yearly basis, a privacy impact assessment (PIA) will be carried out for all cameras, to ensure compliancy with GDPR and the Surveillance Camera Commissioner (SCC) Code of Practice. If necessary, the PIA will be updated to reflect changes with cameras or technology.

The siting of cameras is subject to the approval of the council. All cameras will be prominently placed, taking into consideration all privacy issues and allowing the cameras to be within public view. No camera will be hidden.

A camera will be positioned so as to provide the best possible coverage of the area in which it is placed rather than to provide camera coverage for individual premises. It will be capable of pan, tilt and zoom in almost every case – this will provide identification of persons facially and vehicles by registration plates, in accordance with the council's system performance requirements.

Provision will be made to avoid unwarranted intrusion of privacy by the camera. Random checks will be undertaken by team leaders to ensure that public privacy is not abused. Any operator found to be doing so will be removed from the control room.

## **Incidents**

Definitions of an incident are:

- an event or hostile clash
- a public event causing trouble
- a detached event attracting general attention
- a distinct piece of action.

These might include:

- a fight
- an accident
- a crime
- a suspicious act involving a person, group or vehicle
- an emergency.

## **Police request for viewing**

The police may request, through the police officer in charge of the local police control room, that a particular area be viewed by the CCTV operator in the following circumstances:

- to assist in the event of a major incident or emergency
- to assist in the detection of crime
- to assist in an arrest and gathering of evidence so that offenders may be prosecuted in relation to criminal or public order incidents
- to provide information in relation to traffic flow within town centres
- to assist in the search for very young, old or mentally ill individuals (when duties permit).

Any request from the police will be entered in the occurrence log, together with the length of time engaged and the Regulation of Investigatory Power Act (RIPA) number.

## **Regulation of Investigatory Power Act (RIPA) 2000**

This act was introduced to protect police and intelligence services by making surveillance and similar activities conform to the principle of 'legality' under the European Convention of Human Rights.

### **Intrusive surveillance**

Defined as taking place on residential premises or inside a vehicle (where you would expect more privacy than walking in the street). For this to be undertaken, a RIPA authority is required.

### **Directed surveillance**

Defined as a covert surveillance that is undertaken in relation to a specific investigation or specific operation likely to obtain private information about a particular person. If this is likely to obtain personal information (images), a RIPA authority is required.

For any such surveillance requested by the police, the operator must first obtain a RIPA authority before proceeding and entries made in the RIPA log and occurrence log.

## **Grounds for authorisation**

The following are grounds for authorisation:

- national security
- preventing and detecting crime
- preventing disorder
- protecting public health
- in the interest of public safety.

## **Communications**

A camera monitor will be situated in the control room of the local police station. This will be capable of receiving camera images relayed by the control room operators. A telephone connection will be provided for contacting other emergency services and to make any other calls that become necessary in the running of the control room.

## **Airwaves**

The airwaves radio is owned and maintained by Suffolk Constabulary.

We are registered by the Office of Communications (OFCOM) as an approved sharer, which means we can use the equipment supplied by Suffolk Constabulary. This is a privilege, not a right, and can be removed at any time.

There is an airwave protocol between Suffolk Constabulary and West Suffolk Council which allows this arrangement.

## **Shopwatch and Pubwatch**

Shopsafe is a radio link scheme which enables users in retail premises and public houses to communicate instantly with the control room using hand-held portable radios. The radios are owned and maintained by Shopsafe and leased to retail organisations.

Shopsafe is currently operational in Bury St Edmunds, Haverhill, Mildenhall, Newmarket and Stowmarket. Shopkeepers and publicans radio through to the control room when they are using the system.

## **Body worn video (BWV)**

This code of practice applies to any BWV CCTV surveillance scheme that we operate and covers all units being deployed at any one time by our officers.

BWV CCTV surveillance allows for the control, monitoring and recording of images for the purposes of health and safety, protection of staff or assets and the potential prevention of crime and disorder.

All BWV cameras will be used to capture images (and, in some cases, audio) of identifiable individuals or information relating to individuals which are relevant to the purposes for which the scheme has been established.

In 2013, a new [Surveillance Camera Code of Practice](#) was published by the Home Office which aims to create a more transparent, proportionate and accountable CCTV system.

To assist organisations in achieving the aims set out by the Surveillance Camera Code of Practice, the Home Office also published a [Code of Practice – Steps to complying with the 12 principles](#). If followed correctly, these principles will protect the public as well as uphold civil liberties.

We work to comply with these practices and have conducted a privacy impact assessment to outline precisely what our system entails and what it is being used for. This is to allow transparency, proportionality and accountability as outlined in the Surveillance Camera Code of Practice.

To access the privacy impact assessment in relation to BWV, please visit the webpage [https://www.westsuffolk.gov.uk/community/crime\\_and\\_safety/cctv.cfm](https://www.westsuffolk.gov.uk/community/crime_and_safety/cctv.cfm)

## **Ownership of system**

We own and manage the system which was implemented to assist officers in their day to day activities.

## **Scheme objectives**

Objectives of the scheme are:

- to protect our employees
- to protect and reassure members of the public
- to deter or prevent hostile situations.

## **The purpose of public space surveillance (PSS) systems**

When CCTV systems are initially designed, each camera should have an operational requirement that specifies the purpose of that camera and the response that is expected from the operators. This information can be found within our privacy impact assessment.

The purpose of a CCTV system is documented in both the CCTV Code of Practice and the General Data Protection Regulation (GDPR). All PSS CCTV systems are registered with the Information Commissioner and their purpose can be broadly described under two categories:

- primary purpose
  - to assist in the prevention and detection of crime
  - to assist in the promotion of community safety and to reduce anti-social behaviour
- secondary purpose
  - to assist the client (system owner) in providing any of its prosecuting or contracted services
  - to assist in the management of the town centre – this includes monitoring safety or operationally critical activities on a particular site
  - to assist the client in the protection of assets.

## **Location and access**

BWV cameras are kept in a secure location. Once put on charge, BWV cameras will automatically download all footage to a secure server which can only be accessed by the CCTV control room. Footage will only be accessed by licenced SIA operators upon request by either the police or management in regard to a dispute.

The control room is situated in West Suffolk House, Bury St Edmunds and has its own separate access, which is protected by both access control and a camera to identify persons before entry is allowed. The actual control room will be a secure unit at all times, with further access control.

Visitors will be strictly limited. Only authorised persons with the express permission of the supervising officer will be allowed entry. A police officer will be allowed access when authority has been provided by the local police control room supervising officer. Visitor logs will record all visitors and operators entering or leaving the control room and will record the reason for the visit.

## **Deployment and use of cameras**

Provision will be made to avoid unwarranted intrusion of the privacy by the camera. Random checks will be undertaken by management to ensure that public privacy is not abused.

## **Incidents**

Definitions of an incident are:

- an event or hostile clash
- a public event causing trouble
- an incident causing alarm or distress to staff or public.

## **Training**

Prior to use, officers will need to undergo training in the use of the equipment, including when it is appropriate to switch the camera on, what to inform the member of public when using the camera and the rights of the member of public in accessing their data. This will also be noted in training records.

## **Police request for viewing**

The police may request access to footage if an offence has taken place and this will only be viewed in the following circumstances:

- to assist in the event of a major incident or emergency
- to assist in the detection of crime
- to assist in an arrest and gathering of evidence so that offenders may be prosecuted in relation to criminal or public order incidents.

## **Management request for viewing**

Only service managers and the Data Protection Officer (or delegated representative) can request the control room to carry out a review or download footage in relation to an



incident or parking dispute. All reviews and footage will be recorded to provide an audit trail.

The table below lists examples of when BWV should and shouldn't be activated.

<b>Activated</b>	<b>Not activated</b>
Persistent verbal abuse while an officer tries to talk to an individual during the course of their duties.	When an officer is carrying out their duties without any form of duress.
Threatening and intimidating behaviour towards an officer or member of the public.	In sensitive areas, such as private dwellings, schools and care homes. This will require the officer to provide more evidence to support its use in this situation.
When assisting in the prevention or detection of crime.	To prove an officer has visited a certain location.

## **Public information**

To allow complete transparency with the entire scheme and its operations, the following documents will be published on our CCTV webpage:

- CCTV Code of Practice
- privacy impact assessments
- self-assessment tool
- CCTV sign template
- CCTV location maps
- CCTV statistics on a quarterly basis.

## **Complaints**

Any complaints received regarding the use of CCTV that we operate will be dealt with in a timely fashion. To make a complaint, telephone 01284 763233 and ask to speak to a member of staff, or log your complaint on our website: <https://www.westsuffolk.gov.uk>