

CCTV Control and Operational Procedures

Introduction and Aim:

A Closed Circuit Television (CCTV) system is in operation at Swindon Borough Council, which comprises of a number of cameras installed in strategic locations. The operational capabilities of the cameras are varied; some are PTZ (pan, tilt and zoom), while others are static cameras presenting fixed images.

Monitoring and control facilities are located within the Plus one building, Civic Campus, recording facilities are only located within CCTV monitoring rooms.

The 'owner' and 'data controller' of the system is Swindon Borough Council and for the purposes of the General Data Protection Regulation the 'Data Controller' is Swindon Borough Council Information Governance manager. The 'System Manager' with day- to-day responsibility for the data is the Swindon Borough Council Security Manager.

Data will be processed in accordance with the principles of the General Data Protection Regulation which in summary are, but not limited to:

- All personal data will be obtained and processed fairly and lawfully.
- Personal data will be held only for the purposes specified.
- Personal data will be used only for the purposes, and disclosed only to the people, shown within this policy.
- Only personal data will be held which are adequate, relevant and not excessive in relation to the purpose for which the data are held.
- Steps will be taken to ensure that personal data is accurate and where necessary, kept up to date.
- Personal data will be held for no longer than is necessary.
- Individuals will be allowed access to information held about them and, where appropriate, permitted to correct or erase it.
- Procedures will be implemented to put in place security measures to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of, information.

The purpose of this procedure is to state the intention of the owners and the managers, as far as is reasonably practicable, to support the objectives of Swindon Borough Council CCTV System. The purpose and reason for implementing the CCTV system is as defined in the Strategy document and a supporting tool to achieve the objectives of Swindon Borough Council.

CCTV Control and Operational Procedure:

1. Purpose

The overall purpose of CCTV schemes is to help in the reduction of, and investigation of crime, to protect Swindon Borough Council staff and residents of Swindon Borough from criminal activities. The purposes are in accordance with the following rationale:

- That the use of Swindon Borough Councils Closed Circuit Television (CCTV) adheres to the principles of the General Data Protection Regulation, Human Rights Act 1998, Regulation Investigatory Powers Act 2000 and other relevant legislation
- That the CCTV system is not abused or misused

- That the CCTV is correctly and efficiently installed and operated
- That the CCTV is only accessible to authorised individuals
- To assist in the prevention and detection of crime against both persons and property.
- To facilitate the identification, apprehension and prosecution of offenders in relation to crime.
- To ensure the security of property belonging to Swindon Borough council employees and Swindon Borough Council residents.

Scope:

The Procedure Applies to all employees/residents of Swindon Borough council and for whatever purpose is present.

Ownership and Operation of CCTV:

Swindon Borough Council is the 'data controller' for all CCTV systems operating on its premises. Swindon Borough Council is responsible for all cameras, monitors and data collection and retention processes.

Data Protection Regulation:

Swindon Borough Council's Information Governance Manager & Security Manager will identify and include all its schemes within the notification, as is required under the terms of the General Data Protection Regulation.

All schemes will operate in accordance with the guidelines set out in the 'CCTV Code of Practice' published by the Information Commissioners Office. In order to conform to this Code of Practice, the following guidelines must be adhered to:

- I. Swindon Borough Council security Services operating such schemes, will be responsible for overseeing that monitoring of all images are in accordance with this policy and that suitable operation, back up, retention, destruction and maintenance of all storage media is conducted in accordance with the written operational procedures manual kept within the site control room.
- II. Cameras will not be hidden from view and appropriate steps must be taken, e.g. by signing and displaying posters, to inform the public of the presence of the system and its ownership at all times.
- III. To ensure privacy, images from the system are viewed by trained and authorised staff.
- IV. Images from the cameras are appropriately recorded inline with operational procedures.

Directed Surveillance

Directed surveillance can be undertaken with the consent of the proper authorities and in accordance with the Law, The regulation of investigatory Powers Act 2000 regulates the use of directed surveillance of this type and is subject to a strict code of practice.

Swindon Borough Council should satisfy itself that there are grounds for suspecting criminal activity or equivalent malpractice and that notifying individuals about the monitoring would prejudice its prevention or detection.

Directed surveillance should be strictly targeted at obtaining evidence within a set timeframe and should not continue after the investigation is complete. Cameras should not be placed in areas which you would reasonably expect to be private (e.g. toilets).

It should only be considered in exceptional circumstances, any member of staff wishing to use directed CCTV surveillance should consult the Security Manager and the Information Governance Manager. Both the Security Manager and Information Governance manager can authorise the use of directed surveillance, following the protocols within the Regulated Investigatory Powers Act.

Management of CCTV Schemes:

No part of the CCTV system should be initiated, installed, moved or replaced without prior approval by the Security Manager, to approve such schemes; it must also comply with the General Data Protection Regulation.

All schemes are required to meet all the following standards and must be formally approved (as above) prior to installation;

- I. Establish who the person(s) legally responsible for the proposed scheme within Swindon Borough council department.
- II. Assess the appropriateness of the reasons for, using CCTV or similar surveillance equipment.
- III. Document this assessment process and the reasons for the installation of the scheme.
- IV. Establish and document in accordance with current legislation the purpose of the scheme. (pia forms)
- V. Ensure the notification lodged with the Office of the Information Commissioner covers the purposes for which this equipment will be used.

This must be done jointly by the Security Manager and the Information Governance Manager.

All CCTV equipment should be purchased and installed in conjunction with the Service Procurement Department.

Digital CCTV:

All digital CCTV systems installed must have the storage capacity to hold a minimum of 31-day footage where possible. It may be considered appropriate to retain data for a longer period, a full risk assessment must be taken before making a decision for a longer retention period.

If police require access to CCTV footage an area should be made available for viewing. This area is designated as the Security Control Room at Plus One on the Civic Campus. Trained & Licenced members of staff only to be present to view footage, and downloading to support investigation of incidents.

Recording:

Systems are supported by the hard drive recording facilities which will function as appropriate. In addition incidents can be recorded in real time when necessary.

In the event of the recorded footage being required for evidence, it will be retained for a period recommended by the information commissioner's guidelines.

All footage that has been retained to record information remains confidential and copyright at all times and remains the property of Swindon Borough Council

Positioning of Camera and Signs:

The location of the equipment must be carefully considered, the following points must be taken into consideration before installing either a new CCTV camera or a full CCTV system.

- Equipment should be situated so they can monitor the area that is intended to be monitored.
- Equipment should be situated so they can only monitor the predefined purpose.
- Cameras cannot be positioned in areas where it would be considered private e.g. toilet, changing room, private office. (There maybe exceptions to this in cases of suspicion of serious crime whereby there is police involvement).
- If the CCTV area borders private property every effort should be made to ensure the private area cannot be viewed.
- Signs that CCTV cameras operating shall be displayed at the perimeter of the area covered by the scheme and at other key points.
- The signs shall inform the public that cameras are in operation and allow people entering the area to make a reasonable approximation of the area covered by the scheme

Signs should identify the Swindon Borough Council and give an official address.

Any system implemented must be periodically reviewed to maintain its effectiveness and to ensure blind spots are eliminated where possible; more importantly areas covered remain a priority and that any new emerging hot spots are taken into consideration.

Health and Safety policies should assist in this process.

Administration and Procedure:

A log will be maintained with the control room/viewing area and kept secure. Brief details of incidents will be noted together with any consequential action taken.

It is recognised that the images obtained are sensitive and subject to General Data Protection Regulation.

All DVDs, digital images and copies will be handled in accordance with working procedures, which are designed to ensure the integrity of the system.

A DVD log will be kept on-site for the purposes of recording the use of DVDs, their use and retention for evidential purposes.

Other than authorised staff investigating untoward incidents, digital images will only be viewed at the request of the police or through subject access procedures. Copies of DVDs will only be made for the purposes of crime detection, evidence for prosecutions or where required by law.

All recorded data that is requested to be released, will be approved with full completion and approval of the footage release form.

Camera Control:

On each occasion an incident is recorded, a report setting out the time, date and detail of the incident will be submitted by the relevant CCTV operator to the Security Manager. The cameras can be zoomed in and out and pan and tilted according to the information commissioner's guidelines and the SIA training the operators have gone through.

Adjustment and alteration to siting or use of cameras should be made by staff that has the appropriate authority. Data protection principles should be considered during this process.

DVD handling procedures are in place to ensure the integrity of the image information held.

The Control Room/Viewing Area:

Images captured by the systems will be monitored on-site, in the Security Control Room. Unauthorised personnel or visitors should not be able to see the monitors.

Access to view monitors or DVD and digital images activity will only be granted to persons with a legitimate reason or those who have followed the subject access procedures.

Identity and authorisation will have been presented and validated to the responsible officer. Visitors will be required to complete and sign an access log.

Details recorded will include name, department or organisation, the person who granted the access, time of entry and exit, and the DVD or digital image referenced and extracts viewed.

The viewing of footage by non-security related personnel is only permitted at the discretion of the Security Manager, Information Governance Manager- with the following considerations:

- If they are investigating an untoward incident.
- In the case of a missing person.
- To identify persons relating to an incident
- This viewing area is identified in the server room at the rear of the control room in a secure area.

Areas which would normally result in permission for access to the viewing area being refused include:

- Where a person wishing to view has no connection with the incident or has no management role relating to the incident.
- Where viewing is purely salacious.
- Where the performance of a member of staff not relating to crime, fraud or the investigation of untoward incidents is involved.
- For occurrences that relate to damage to private property for which Swindon Borough Council has no responsibility.

Access to view the monitors, within the security control room whether to operate the equipment or to view the images is restricted to staff with that responsibility, training & licence.

The daily log book shall record staff on duty each shift, and the names of any person groups that have been authorised by the individual with day to day responsibility for the scheme to have access to the control room and/or view the monitors.

Responsible operator shall be present during the operation of the monitors. If monitors are to be left unattended, the area in which they are kept shall be secured against unauthorised entry.

Arrangements for the control room shall include the following requirements to ensure that the control room is secure at all times:

- Routines and procedure and any other facilities necessary to ensure that the control room is protected from unauthorised access.
- Records are kept of all access to the control room including operation and duty, recording details of the individual concerned, and times of arrival and departure.
- Operation times and numbers of staff on shift are clearly defined and complied with.
- Access to the control room is restricted to operating staff and their managers according to prearranged shifts and on production of valid identification.
- Technical repairs and cleaning and similar activities should be carried out in controlled circumstances.

Public access to or the demonstration of monitors shall not be allowed except for lawful, proper and sufficient reason

Any officer outside of direct responsibility to the operation of the control room who requests to view recorded images for any other purpose than that for which the scheme was designated must be directed to the Security Manager. If this occurs out of normal working hours, access to view should politely be denied.

Disposal of images:

At the end of their useful life, all DVDs will have their images magnetically erased and disposed of as confidential waste and spot checked for erasure prior to being destroyed or disposed of. Confidential waste should be shredded or placed in the appropriate bag for disposal and the appropriate serves to collect the confidential waste.

Quality of Images:

It is important the images produced by the equipment are as clear as possible in order that they are effective for the purpose(s) for which they are intended. Upon installation, an initial check should be undertaken to ensure that the equipment performs properly.

The medium on which the images have been recorded should not be used when it has become apparent that the quality of images has deteriorated.

If the system records features such as the location of the camera and/or the date and time reference, these should be accurate.

When installing cameras, consideration must be given to the physical conditions in which the cameras are located e.g. infrared equipment may need to be installed in poorly lit areas.

Cameras should be properly maintained and serviced to ensure that clear images are recorded.

They should be protected from vandalism in order to ensure that they remain in working order. If a camera is damaged, follow reporting procedures to ensure the camera is fixed within a specific time.

The quality of the maintenance work should be monitored and checked before being permanently sited to eradicate obstacles which may affect its view.

Breaches of the Policy:

Swindon Borough Council reserves the right to take disciplinary action against any employee who breaches this policy in accordance with the Disciplinary procedures. As a major purpose of these schemes is assisting to safeguard the health and safety of staff, and residents, it should be noted that intentional or reckless interference with any part of the monitoring equipment, including cameras/monitors/back up media, may be a criminal offence and will be regarded as a serious breach of the Policy. Where a serious breach occurs, Swindon Borough Council must appoint a Senior Manager independent of the operation of the scheme to investigate the breach with advice from the Security Management.

Complaints Procedure:

Complaints regarding the operation of Swindon Borough Councils CCTV system must be progressed through the Information Governance team or through the jadu online form.

Monitoring Compliance:

Compliance is monitored in the following ways:

Information Governance Manager will conduct a review of the CCTV system to ensure that it meets the data protection requirements on a bi annual basis and report findings to the Security Manager.

The Security Manager and Information Governance Manager will, together, on an annual basis, conduct a site inspection of the CCTV signage, camera locations and an inspection of the DVD log to ensure compliance with the policy and General Data Protection Regulation. The results will be assessed by the head of Business Support & Resilience.

Forms used in Control Room:



CCTV AUDIT SHEET
2023.doc



CCTV Fault Report
Sheet.doc



CCTV VISITORS LOG
BOOK.doc