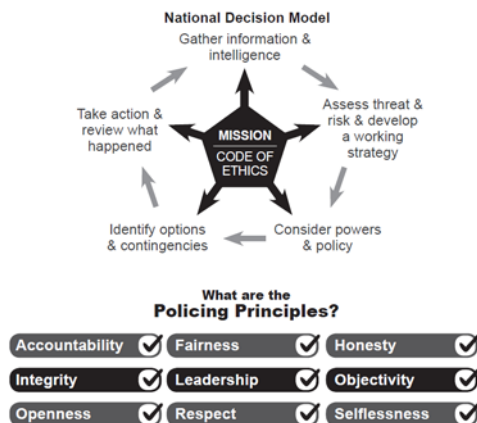




Surrey Public Space CCTV and Surveillance Camera Codes of Practice

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1. Background

- 1.1. The Surveillance Camera Code of Practice issued in 2012 relates to overt surveillance camera systems which are deployed in public spaces in England and Wales. Section 33(5) of the Protection of Freedoms Act 2012 (PoFA) provides that any chief officer of a police force in England and Wales is a relevant authority for the purposes of compliance with the provisions of the code.
- 1.2. The code is not a statutory obligation but guidance designed to safeguard public confidence in the legitimacy of CCTV systems. It sets out 12 guiding principles which cover the technical qualities and operation of systems, as well as the subsequent use, storage and security of the data collected.
- 1.3. Failure on the part of any person to act in accordance with any provision of the surveillance camera code does not of itself make that person liable to criminal or civil proceedings. The surveillance camera code is admissible in evidence in any such proceedings. A court or tribunal may, in particular, take into account a failure by a relevant authority to have regard to the surveillance camera code in determining a question in any such proceedings.
- 1.4. Surrey Police has recently undertaken a thorough review of CCTV within the county with the aim to produce a clear strategy for the future. There are challenges to achieving this, due to the fragmented nature of the current CCTV provision in the county, and the fact that Surrey Police are not the CCTV camera owners.
- 1.5. In July 2017 the governance for CCTV was centralised within the contact and deployment command.
- 1.6. The initial objective following the decision by Chief Officers to centralise the governance of CCTV, was to standardise working practices across the force in relation to CCTV viewing, and start to scope options with the local authorities around the future provision of CCTV in the county.

2. Content

- 2.1. Public space CCTV operates across the Surrey Police area and is concentrated in the more urban areas. In about two thirds of the county the CCTV systems are owned and maintained by the respective local authorities but are operated and monitored by Surrey Police in Surrey Police premises. In the remaining third of the county the CCTV systems are either owned or operated solely by the local authority or an independent third party monitoring company.
- 2.2. On the 31st July 2017 the office of the Surveillance Camera Commissioner formally wrote to all relevant authorities (including chief constables). The letter highlighted the importance of compliance with the surveillance commissioner's codes of practice, and requested relevant authorities complete a self-assessment questionnaire around compliance and general system use.
- 2.3. The self-assessment was completed in conjunction with the relevant local authorities, who as the camera owners have responsibility for compliance against a number of principles of the code of practice.
- 2.4. Although there was a general level of compliance with the 12 principles of the code of practice. The self-assessments did identify some areas for improvement, and further highlighted the issues associated with the fragmented nature of the counties CCTV provision. The below table shows areas of responsibility for compliance against the 12 principles of the code of practice.

| Principle | Reigate CCTV SURPOL | Reigate Banstead Council | Mole Valley Council | Epsom Borough Council | Guildford CCTV SURPOL | Guildford Borough Council | Farnham Town Council | Woking CCTV SURPOL | Woking Borough Council | Surrey Heath Borough Council |
|-----------|------------------------|--------------------------|---------------------|-----------------------|--------------------------|---------------------------|----------------------|-----------------------|------------------------|------------------------------|
| 1 | | YES | YES | YES | | YES | YES | | YES | YES |

| | | | | | | | | | | |
|----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| 2 | | YES | YES | YES | | YES | YES | | YES | YES |
| 3 | | YES | YES | YES | | YES | YES | | YES | YES |
| 4 | YES | YES | YES | YES | YES | YES | YES | YES | YES | YES |
| 5 | | YES | YES | YES | | YES | YES | | YES | YES |
| 6 | YES | | | | YES | | | YES | | |
| 7 | YES | YES | YES | YES | YES | YES | YES | YES | YES | YES |
| 8 | | YES | YES | YES | | YES | YES | | YES | YES |
| 9 | | YES | YES | YES | | YES | YES | | YES | YES |
| 10 | | YES | YES | YES | | YES | YES | | YES | YES |
| 11 | | YES | YES | YES | | YES | YES | | YES | YES |
| 12 | YES | | | | YES | | | YES | | |

- 2.5. Compliance with the code of practice in Runnymede, Spelthorne and Elmbridge is the sole responsibility of the borough councils or third part monitoring company. Surrey Police are not involved in the running of these systems. There is no public space CCTV system in Tandridge.
- 2.6. On 22nd September Surrey Police hosted a CCTV stakeholders summit at Mount Browne, the event was well attended, and a first opportunity to hear the views in relation to key stakeholders' positions and aspirations around the future of CCTV in the county.
- 2.7. It was clear from the summit that some CCTV stakeholders are in very different positions in relation to CCTV, and there are a number of conflicting views and priorities.
- 2.8. Options discussed at the summit and currently being scoped are around the feasibility of forming a central CCTV partnership similar to Sussex, and the possibility of some borough councils taking over the monitoring of their CCTV systems. A number of key stakeholders volunteered to be part of a working group to progress this piece of work.
- 2.9. Much of Surrey's existing CCTV camera system is becoming outdated and still uses analogue technology, as part of any future CCTV partnership work we will be exploring options around a more agile IP networked system with remote interfacing.

3. Conclusion[s]

- 3.1. Following work completed by the CCTV working group we will have a much clearer indication around the feasibility of a central CCTV partnership or borough councils taking over the monitoring of more CCTV from the police. It is anticipated that this work will be completed by the end of the financial year allowing for a clear Surrey Police CCTV strategy to be produced.
- 3.2. The office of the Surveillance Commissioner awards a charter mark to relevant authorities CCTV systems and their use, as a result of acquiring independently accredited certification of their adoption of the 12 principles of the Codes of practice. The working group will also work on trying to achieve this status for the existing systems.

4. Decision[s] Required

- 4.1. None, this paper is for information only.

5. Attachments / Background Papers

The Surveillance Camera Code of Practice 12 Guiding Principles

- 1  What's your system for?
 Do you review its use?
- 2  Have you carried out a privacy impact assessment?
 Do you publish your privacy impact assessment?
- 3  Do you have signage in place to say surveillance is taking place?
 Is there a published point of contact for people to raise queries or complaints with?
- 4  Who's responsible for your system?
 Are your staff aware of their responsibilities?
- 5  Do you have clear policies and procedures in place?
 Do your staff know what your policies and procedures are?
- 6  How long do you keep images/information?
 How do you make sure images/information is deleted once they're no longer needed?
- 7  Do you have a policy on who has access to the stored information?
 Do you have a policy on disclosure of information?
- 8  Do you follow any recognised operational or technical standards?
- 9  Do you make sure that the images captured by your system are caught securely?
 Are only authorised people given access to the images?
- 10  Do you evaluate your system regularly to make sure it's still required?
 Could there be an alternative solution to a surveillance camera system?
- 11  Can the criminal justice system use the images and information produced by your surveillance camera system?
 Do you have a policy on data storage, security and deletion?
- 12  Do you use any specialist technology such as ANPR, facial recognition, Body Worn Video (BWV) or remotely operated vehicles (Drones)?
 Do you have a policy in place to ensure that the information contained on your database is accurate and up to date?