

Tunbridge Wells Borough Council

Annual CCTV Review 2023

Date of review: May 2023

Responsible officer: Sharon Wright, CCTV Partnership Manager

Contact details of responsible officer: 01892 526121

Next review due by: May 2024



Operational Requirements

Requirement	Review of compliance	Further action required
Does the system continue to meet the purpose for which it was installed?	The system continues to meet its original lawful objectives as set out in the Code of Practice for the operation of the Closed Circuit Television System.	
Have any complaints been received about an individual camera or the whole/part of the system? If yes, what was the outcome?	No complaints were received during the review period 1st April 2022 to 31st March 2023.	
Has the location of each camera been reviewed to ensure they remain suitable?	Yes this is done on an annual basis.	Crescent Road Car Park roof top floor installing additional cameras due to ABS.
Are there any new residential/business developments within existing areas that could benefit from additional cameras/moving existing cameras?	None at the moment, there is a close working liaison between the CCTV Manager and partners'; including planning department to ensure this is considered as part of the planning process.	
Is there a comprehensive maintenance and cleaning regime in place?	A maintenance contract is in place with DSSL.	Cleaning every 6 months.
Is there appropriate and sufficient signage in place to warn people that CCTV is in use?	Signage is in place.	Maintenance contractor to install new signage as required.

Requirement	Review of compliance	Further action required
Is the Code of Practice up to date?	Yes, Updated Code of Practice was completed in May 2023.	The 2023 CCTV Code of Practice is waiting to be signed and accepted by Kent Police and Tunbridge Wells Borough. Annual reviews carried out.
Is the Code of Practice accessible to both staff and the public?	A copy of the Code of Practice is available to all staff within the CCTV control room and it is also published on the Tunbridge Wells Borough Councils website as a public document.	
Is the equipment of sufficient quality to enable images to be used as evidence in court?	All cameras/equipment have been installed to meet NSI NACOSS Gold Scheme by our CCTV Contractors.	
Are there regular function checks to ensure that all equipment is operating and recording correctly and that all images are stamped with the correct date/time?	Daily camera/recording checks are undertaken twice a day on each shift. Any identified system faults are reported for repair to the appropriate contractor.	
What precautions are in place to ensure that data will continue to be collected e.g.in the event of a failure of power to cameras?	A main building generator to combat any power failures supports the control room.	

Privacy Impact Assessments

Requirement	Review of compliance	Further action required
Where are the real time images from the cameras displayed?	Real time images are displayed within the CCTV control room. Selected images can be “relayed” through to Kent Police Force Control room.	To continue with full compliance, an annual external inspection is carried out by the SSAIB accredited to the CCTV Surveillance Camera Commissioner Office. This is to ensure total compliance.
Who has operational access and ability to control the CCTV cameras?	Operational access is restricted to the CCTV Control Room Manager, Supervisor and appointed CCTV Operators.	.
What measures are in place to control access to the area in which the recorded images are stored?	Access control measures are in place to restrict access into the control room only to authorised and trained personnel. CCTV cameras are in operation in this area.	
How are the images recorded?	Images are recorded on Bosch recorders.	
Who has access to the recorded images?	Access is restricted to the CCTV Control Room Manager, Supervisor and appointed CCTV Operators. Access as required is provided to the maintenance contractor solely for the purposes of system maintenance.	
How is access gained to the recorded images?	Approved users via system login to gain physical access to all data.	

Requirement	Review of compliance	Further action required
How long are the images retained?	31 days.	
How are the images deleted?	The system automatically over-writes all data not required for evidential purposes after 31 days.	
When the data is downloaded or copied for release, to a third party how is information recorded?	All reviewed and or released data is recorded in the review or data released logs for continuity of evidence.	
What processes are in place to ensure that data protection responsibilities are understood by persons receiving the data?	Data is normally only released to the Police or enforcement agencies. These agencies are all required to have Data Protection Policies in place. Relevant paperwork is completed and a copy retained for evidence.	

Service Standards

Requirement	Review of compliance	Further action required
Ensure that the CCTV control room is staffed 365 days a year.	During the COVID-19 pandemic, the Control Room continued operational 24/7 during this period of national lockdown. CCTV operated with single manned shifts, for the safety and protection of staff.	Government guidelines are regularly monitored for changes.
When requested, provide CCTV evidence to Police and other enforcement agencies.	There are numerous processes ensuring compliance as per the monthly CCTV Performance Indicators.	
Meet Security Industry Authority (SIA) licensing requirements for Public Space Surveillance.	All operators are SIA licensed.	
Provide and maintain a CCTV Code of Practice.	Yes updated and reviewed every year.	
Maintain the system using an external contractor who will provide emergency callout and repair services.	Service provided by DSSL	
Tunbridge Wells Borough Council carried out regular internal CCTV audit and reviews.	The last audit result concluded that the controls offered SOUND assurance, meaning the system is designed and operated effectively.	

Home Office Surveillance Camera Code of Practice

Requirement	Review of compliance	Further action required
Use of a surveillance camera must always be for a specified purpose, which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.	This is detailed in our code of practice and the system is registered with the ICO.	To continue with full compliance, an annual external inspection is carried out by the SSAIB accredited to the CCTV Surveillance Camera Commissioner Office. This is due in August 2023.
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.	<p>Privacy Impact Assessments have been completed. These are reviewed on an annual basis. If new cameras are added then a PIA is updated.</p> <p>A PIA will be completed when a new location is identified for the deployable camera.</p>	
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.	<p>The following are published on the Council's :</p> <ul style="list-style-type: none"> • CCTV Code of Practice • Annual Review • Annual CCTV Report • Privacy Impact Assessment • Surveillance Camera Code of Practice: self-assessment tool 	

Requirement	Review of compliance	Further action required
There must be clear responsibility for all surveillance camera system activities including images and information collected, held and used.	Details of responsibilities are contained within CCTV Code of Practice.	
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.	Existing system in operation for many years and operated within the CCTV Code of Practice and supplemented by a CCTV Procedure Manual for control room staff.	
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 their purposes have been discharged.	Images on system are deleted after 31 days.	
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.	This is as per the Code of Practice.	

Requirement	Review of compliance	Further action required
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.	System has been installed to meet Home Office guidelines. A maintenance contract is in place to ensure that standards continue to be maintained. Operators are trained to SIA level to ensure competency.	
Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.	Appropriate security measures are in place as detailed within the CCTV Code of Practice.	
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.	The Tunbridge Wells Borough Councils Public Space CCTV Control Room has successfully achieved the Surveillance Camera 5 year Certification for compliance in 2019.	The certificate of compliance from the Commissioner entitles Tunbridge Wells Borough Council to use the Commissioner's certification mark throughout the five-year period subject to an annual review. This is due in August 2023
When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, 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.	System has been established to meet the pressing need of the prevention and detection of crime. Procedures are in place to ensure that appropriate standards are achieved and images of evidential value are provided.	

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