

# **A CODE OF PRACTICE FOR THE CAMBRIDGE CITY COUNCIL'S PUBLIC CCTV SCHEME**

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This Code of Practice has been the subject of extensive public consultation. Its aim is to ensure that the principles, which will govern the regulation and operation of the Cambridge CCTV system, are known to and approved by Cambridge residents.

For all enquiries about the Code of Practice, please telephone Martin Beaumont on (01223) 457390

## **CODE OF PRACTICE**

### **INTRODUCTION**

The Cambridge CCTV System has been developed in response to the growth of crime and fear of crime in the city. The sole purpose of the Cambridge CCTV System is to make the city a safer and more welcoming place at any time of the day or night, allowing all citizens and visitors, regardless of age, gender or race, the opportunity to participate fully and without fear in the life of the City.

Cambridge City Council, The Guildhall, Market Square, Cambridge, CB2 3QJ, operate the CCTV cameras, which is responsible for the fair and effective operation of all aspects of the CCTV service. A monitor screen has been installed at Police Headquarters at Hinchingsbrooke, which will allow the Council Control Room to relay pictures through to the Police.

The Code is also supported by an Operational Manual for staff operating the system. Only CCTV Staff, the Director of Environment, the Head of Specialist Services and the Police Liaison Officer have authorised routine access to the CCTV Control Centre.

The System comprises of a number of colour and monochrome cameras and is operated from a Control Centre located at the Guildhall, Market Square, Cambridge, CB2 3QJ. The images from these cameras are recorded and monitored 24 hours a day, 365 days a year. All recorded material is the property of Cambridge City Council, which retains copyright.

This Code of Practice sets out the aims of the CCTV system and how it will be used. The system will not be used for any other purpose than those set out in this document. The operation of the System will be made accountable to the citizens of Cambridge via Cambridge City Council's Strategy-Scrutiny Committee, which will monitor its performance and review its effectiveness. The day-to-day management of the system will be the responsibility of Martin Beaumont, CCTV Manager.

### **1. PURPOSE STATEMENT**

- 1.1 It is important that all those who will be affected by the Cambridge CCTV Scheme and all those charged with operating the service understand exactly why the system has been introduced and what it will and will not be used for. The key objectives of the Cambridge CCTV System are:

- . Protecting areas and premises used by the public;
- . Deterring and detecting crime;
- . Assisting in the identification of offenders leading to their arrest and successful prosecution;
- . Reducing anti-social behaviour and aggressive begging;
- . Reducing fear of crime;
- . Encouraging better use of city facilities and attractions;
- . Maintaining and enhancing the commercial viability of the city and encouraging continued investment.

## 1.2 Privacy

We respect and support the individual's entitlement to go about their lawful business and this is a primary consideration in the operation of the System. Although there is inevitably some loss of privacy when CCTV cameras are installed, cameras will not be used to monitor the progress of individuals in the ordinary course of lawful business in the areas under surveillance. Individuals will only be monitored if there is reasonable cause to suspect that an offence has been or may be about to be committed, as defined by the Operational Manual given to staff.

The Control Centre Operators must only use the cameras to view public areas and not to look into the interior of any private premises or any other area where an infringement of privacy of individuals may occur. The only exceptions to this rule are first, if an authorised operation is mounted under the Regulation of Investigatory Powers Act (see paragraph 1.6) or response to a police or other enforcement agencies' request for assistance following a crime being committed, or if an Operator, whilst operating the cameras in accordance with this Code of Practice, nevertheless happens to observe something which s/he believes indicates that a serious crime is being, or is about to be committed in a non-public area. Any event where an Operator takes a decision positively to view or continue viewing a private area must be entered into the Incident Log. The details must include location, time, date, camera number and the reason for the observation. Operators will be required to justify their actions. Any breach of this condition of employment will result in disciplinary proceedings and may lead to the dismissal of the Operator.

## 1.3 Cameras

All cameras are sited so that they are clearly visible, except for cameras as part of the Re-deployable CCTV system and in car parks, where cameras are mounted within protective domes. No hidden cameras will be used, nor will the Scheme utilise any non-functioning or 'dummy cameras'.

Publicity will be given to the system by clear signing within the monitored area. This will ensure that both the maximum deterrent value is achieved and that the public are clearly aware when they are in a monitored area. The System will not record sound in public places.

The Re-deployable CCTV cameras are designed to be deployed into other areas of the city for short periods of time. They are normally mounted on lampposts or buildings and send their images back to the CCTV Control Room via an encrypted radio signal. The use of these cameras is governed in exactly the same way as the fixed position cameras and they will be operated in accordance with this Code of Practice.

#### **1.4 Provision of Evidence**

Arrangements will be made to provide recorded images to the Police and other enforcement agencies including local authority departments. These images may be used to conduct investigations into potential criminal offences (e.g. racial harassment). Images will only be released in connection with law enforcement processes.

#### **1.5 Breaches of the Code**

Any breach of the Code of Practice is a serious matter. Officers or Control Centre staff who are in breach of the Code will be dealt with according to the disciplinary procedures of the City Council, a process that could ultimately result in their dismissal. If an employee/contractor were to misuse the images to make a profit for him/herself, the Council would take all possible steps to recover the profit made.

The responsibility for guaranteeing the security of the System will rest with the CCTV Manager, Martin Beaumont, who will in the first instance investigate all breaches or allegations of breaches of security and report findings to the Director of Environment and the Council's Internal Ombudsman who will jointly agree a response. If no agreement is reached, the matter will be referred directly to Committee.

In the event of a serious breach Cambridge City Council will request that a person with relevant professional qualifications who is independent of the Scheme undertake an investigation and make recommendations to the Council on how the breach can be remedied.

#### **1.6 Legislation**

The Cambridge CCTV Scheme has been registered with the Information Commissioner's Office and will follow the guidelines of the Data Protection Act 1998 and the principles of good practice identified by the Information Commissioner (address on last page of this document).

In addition, Cambridge City Council's CCTV system will comply with the Human Rights Act 1998, the Freedom of Information Act 2000 and the Regulation of Investigatory Powers Act 2000.

The Regulation of Investigatory Powers Act is to ensure that investigatory powers of the intelligence services, the police and other enforcement agencies are used in accordance with the Human Rights Act and Cambridge City Council will ensure that all requests for assistance from the Council's CCTV system under this Act are examined in detail to ensure that they are proportionate, legal, appropriate and necessary. Where any doubts exist, legal advice or advice from the Surveillance Commissioner's Office (address on last page of this document) will be sought before the Council agrees to undertake action under this Act.

## 1.7 Changes to the Code

Revision and change to the Code of Practice will inevitably occur during the life of the CCTV Scheme, due to evaluation of the Code and developments in the technology used in the Scheme. The Executive Councillor will approve all major changes to the Code of Practice after consideration by the Strategy Scrutiny Committee. If agreed, a new Code of Practice will be produced containing any newly agreed provisions and this New Code will replace all existing old codes which will be withdrawn from public circulation. The Director of Environment has authority to make minor amendments to the Code of Practice.

## 2. ACCOUNTABILITY

There is a need for a well-defined structure of responsibility to the public to maintain public support and confidence in the CCTV System. The Cambridge CCTV Scheme will address this issue in the following way:

- Copies of the Code of Practice as agreed following public consultation will be made available for public inspection at all Council reception points, public libraries and on the City Council's Website;
- The Council's formal complaints procedure covers complaints concerning the operation of CCTV.

## 3. EVALUATION

Cambridge City Council will be responsible for the evaluation of the Scheme, which will be conducted at regular intervals following its introduction. This evaluation will be conducted both internally (Police and City Council staff) and independently by a body appointed by the Council. The following areas will be examined as part of the evaluation process:

- Assessment of the impact on crime;
- Assessment of neighbouring areas without CCTV (Displacement);
- The views of the public;
- Operation of the Code of Practice.

The costs of the evaluation programme will be built in to the annual running costs of the Scheme and the results of the evaluation, where appropriate, will be published.

## 4. CONTROL CENTRE OPERATION AND ADMINISTRATION

### 4.1 Staff

The Control Centre will be operated on a 24-hour basis. Staff are employed by Cambridge City Council and are appointed subject to approved vetting procedures, to ensure their suitability for the work.

Cambridge City Council will ensure that all Operators are trained to a proficient level and are licensed by the Security Industry Authority before they are allowed to take up an operational position in the

Control Room. Training will include:

- Use of equipment;
- Observation techniques;
- City Council procedures and record keeping;
- Report procedures and action on incidents;
- Evidence handling;
- Actions in the event of an emergency;
- Legislation and crime prevention;
- Operational exercises.

A suitably qualified member of the CCTV staff will supervise all training at all times. The Council will also ensure that all Control Room Operators are provided with annual "Refresher Training" to ensure that the highest operating and management standards are maintained. The Council will ensure that training records are maintained for each member of staff employed in the Control Centre. The conditions of employment will require a "Confidentiality Clause" which prohibits public and private disclosure of information obtained during monitoring. This clause will be effective both during and after staff service on the scheme.

The Council also reserves the right to exclude permanently from the Control Centre, and/or require the dismissal of, any Operator who is in breach of this Code. Staff will be required to provide the Police from time to time with statements required for evidential purposes.

Health and Safety issues regarding the CCTV Control Centre, its staff and visitors are covered in detail in Parts 1 and III of these documents.

#### **4.2. Operating Efficiency**

The Control Centre Duty Operators will daily confirm the operational efficiency of the system and the link to the Police. Any defects will be reported to the CCTV Manager Martin Beaumont. They will be logged and remedial action will be taken immediately.

At all times there will be at least one person remaining in the Control Centre. All use of the cameras shall accord with the purposes and key objectives of the Scheme as developed in training and specific operating instructions to staff, and shall comply with the Code of Practice.

Images and records will be reviewed periodically, and without prior notice to staff, by the CCTV Manager to ensure that this is happening. Staff will be aware that they will be subject to this audit of their recordings and will be required to justify their interest in a member of the public or particular premises. In the event of an emergency requiring evacuation of the Control Centre, procedures will be put into operation to ensure the continued operation and security of the system.

#### **4.3 Access**

The Control Centre door has an access control system and will remain secured at all times. Routine access to the Control Centre will be limited to:

- Duty CCTV staff;
- Designated officers of the Council;
- Designated police officers;
- Police officers who have been authorised by the Police Duty Officer and by prior arrangement with the CCTV Manager or duty CCTV staff;
- Particular arrangements will apply to visitors and contractors as outlined in 4.4 and 4.5 below.

#### **4.4 Visitors**

Organised visits for viewing the operation of the system will be arranged from time to time, but these may be subject to change or termination at short notice to meet operational requirements. Operation of equipment will only be carried out by the duty staff. All other persons wishing to visit the Control Centre must make their request to the CCTV Manager or in his absence the Head of Specialist Services or the Director of Environment. Visitors may be asked to make their request in writing specifying the reasons for that request.

It is important that operations are managed with the minimum of disruption. Casual visits will not be permitted. All visitors will sign a log detailing their name, company, organisation, and their arrival and departure times. This log will be subject to regular audit and assessed to ensure compliance with the Code of Practice and operating procedures.

#### **4.5 Contractors**

Access for contractors will be necessary from time to time for the purpose of maintaining the Control Centre and its equipment. This will be limited to that strictly necessary for the work. At no time will contractors be left unattended in the Control Centre. All contractors' visits will be logged.

#### **4.6 Police**

The Police should not require access to the Control Centre unless specifically designated or authorised. Police officers attending unexpectedly shall only be admitted after the purpose of the visit has been approved by contact with the Duty Officer at the City Police Station or the CCTV Manager. Their attendance will be logged.

#### **4.7 Control Centre Operation**

There must always be at least one Operator present within the Control Centre. An Incident Log will be maintained on the basis of date and time of day throughout operation. It will give brief details of all incidents monitored and show all relevant actions taken by Operators.

A Visitor Log will be maintained in the Control Centre, which all visitors will be required to complete. The entry will show the time, duration, date and intended purpose of the visit. A Media Movement Log will be maintained.

#### **4.8 Communications and Control**

A monitor is installed in the Control Room at Police Headquarters at Hinchingsbrooke. Pictures from any of the cameras may be relayed to this monitor at the instigation of the CCTV Operator or at the request of the Duty Police Operator. The Police have no direct control of any cameras nor images relayed to their monitor. A dedicated radio and IP link with the Police Control Room is provided for communication. The link will only be used for official purposes. Emergency procedures will be used in appropriate cases to call or liase with fire, ambulance or other emergency services.

## **5. DIRECTION AND CONTROL OF THE SYSTEM**

### **5.1 Direction**

Operation of the system is the responsibility of the Director of Environment. The system is directed towards providing a safer environment for the community. The Council will use the system for:

- Day to day monitoring of the surveillance areas;
- The security of Council premises, land and street furniture;
- Monitoring premises using cameras and alarms owned by third parties under appropriate agreements.

### **5.2 Police Role**

The control of the cameras and monitoring is in the hands of the Control Centre staff only. The Police may request assistance in order to:

- Assist with the deployment of resources;
- Monitor potential public disorder or other major security situations;
- Assist in the detection of crime;
- Facilitate the apprehension and prosecution of offenders in relation to crime and public order;
- Assist with the detection of moving traffic offences where it is considered that the public safety is at risk.

Such requests will usually arise after the Police have been contacted by the Duty Operator. In these circumstances the Police Duty Operator may request the Duty Operator to take further action. In circumstances when problems are anticipated, arrangements may be made for a Police Officer to be present within the CCTV Control Centre for liaison purposes. This will normally apply for the duration of the incident and will be subject to the arrangements made by the Police Duty Officer. On each occasion a record must be made in the Incident Log.

### **5.3 Major Incidents**

Use of the CCTV System will be integrated into the Council's Emergency Planning Procedures during major civil emergencies. If required, the Chief Executive or their designated deputy will authorise the deployment of a Liaison Officer from the major civil emergencies team into the CCTV Control Centre.

The Duty Operator(s) will give assistance and technical advice as required in all matters concerning the deployment and use of the facilities within the CCTV Control Centre.

#### **5.4 Third Party Equipment**

The Council may monitor pictures from cameras installed by third parties subject to the making of the necessary formal agreements and the acceptance by third parties of this Code of Practice. Designated persons will have access to the Control Centre by prior appointment only and such visits will be strictly for the purpose of reviewing the operation of their own equipment. Attendance will be closely supervised at all times and equipment will continue to be operated by the Duty Operators. Access to images is detailed in the following section.

### **6. CONTROL OF IMAGE and RECORDING MEDIA**

#### **6.1 DVD/CD Recording**

Recorded materials may need to be submitted as evidence in criminal proceedings and therefore must be of good quality, and be accurate in content. All such material will be treated in accordance with strictly defined procedures to provide continuity of evidence and to avoid contamination of the evidence. The Control Centre system is supported by permanent digital recording for all cameras. Recorded material will not be sold or used for commercial purposes or the provision of entertainment.

The showing of recorded material to the public will only be allowed in accordance with the law; either in compliance with the needs of Police in connection with the investigation of a crime, which will be conducted in accordance with the provisions of this Code of Practice, or in any other circumstances provided by law.

In certain circumstances images may be retained or copied for training, demonstration or evidential purposes. All other routine recordings will be retained for 28 – 31 days and then erased in accordance with defined operating procedures. Details of all reviewing of images will be recorded in the Third Party Viewing Log.

The Council retains copyright of all images and would use this to restrain unauthorised use of them. This would remain the case even if the monitoring were being carried out by contractors.

#### **6.2 Control of DVD/CD Media**

All images on disc media will remain the property of the Council. Each new disc must be clearly and uniquely marked before it is brought into operation.

At each use the identification number of the disc, date, time of insertion and time of removal shall be noted in the Media Movement Log.

Except for evidential, training and demonstration purposes discs containing recordings must not be removed from the Control Centre under any circumstances. All discs will be erased prior to disposal.

### **6.3 Access to Images**

The principal external source of requests for access to images is expected to be from the Police or other enforcement agencies. The Duty Operators may deal with these requests. Other requests for access, such as for monitoring traffic flows, must be made in writing to the CCTV Manager, specifying the reasons for the request. Such reviewing must be directly supervised at all times.

Access to images by third parties will not normally be allowed except where a formal agreement is in force relating to monitoring of third party cameras. There may be circumstances in which the Council is subject to a court order to release images in connection with civil disputes. These cases are likely to be unusual, but the Council would be unable to refuse to release material in these circumstances. Access to disc containing the images or video print image evidence for lawyers acting for defendants or victims in connection with criminal proceedings will be provided under the Disclosure of Evidence Act by either the Police, Crown Prosecution Service or enforcement agency dealing with the case.

There may be a request under the Data Protection Act or the Freedom of Information Act to allow individuals to see or be informed about any data held about them. Since data is only stored for a maximum of 28 days, it is vital that such requests are made in writing to the City Council's Information Management Officer (address on the last page of this document) as quickly as possible, but in any event within 21 days to allow the relevant data to be held. The applicant will then be sent the necessary form to be filled in and returned so that their request can be met.

No other access will be allowed unless approved by the CCTV Manager for reasons, which fall within the purposes and objectives of the Scheme and in accordance with the Code of Practice.

### **6.4 Images from Third Party Cameras**

Where a formal agreement for third party monitoring is in force, routine access to images will not be allowed. Applications to review images must be made in writing to the CCTV Manager specifying the reasons for the request. Third party viewings and production of recordings will be dealt with in the same way as all other agencies.

### **6.5 Copying of Images**

Except for training, demonstration and evidential purposes images may not be copied in whole or in part.

### **6.6 Evidential DVD or CD Discs**

Discs required for evidence will be dealt with in accordance with The Police and Criminal Evidence Act 1984 (PACE). A record will be made in the Third Party Viewing Log of the production of a master discs and its release to the Police or to other authorised agencies. An authorised officer may only remove these master discs from the Control Centre to a secure store.

Discs provided to the Police or other agencies shall at no time be used for anything other than the purposes for which they were originally released.

## **6.7 Photographs**

The use of photographs for briefing camera operators should be conducted strictly in accordance with advice from the Police to avoid contamination of evidence. Unless otherwise advised by the Police, photographs:

- Should not be on display;
- Should only be retained if provided by the Police for this purpose;
- Should be seen only by individuals stipulated by the Police.

## **7. REVIEW AND EVALUATION**

### **7.1 Review**

CCTV Operations will be subject to regular review against the objectives of the Scheme. A core set of criteria has been agreed, and information will be collected at regular intervals measuring progress against them. Improvements to operating procedures will be made as soon as they are identified.

## **8. COMMENTS AND COMPLAINTS**

### **8.1 Comments**

Comments on the scheme may be addressed to the Director of Environment who has operational responsibility for the scheme.

### **8.2 Complaints**

Formal complaints about the operation of the system should be addressed to the Director of Environment (address is on the last page of this document) as soon as possible after the incident or the CCTV action causing the complaint. They will be dealt with in accordance with the City Council's formal complaints procedure.

### **8.3 Addresses**

Contact addresses are:

Simon Payne  
Director of Environment  
Cambridge City Council  
The Guildhall  
Cambridge CB2 3QJ

Paul Necus  
Head of Specialist Services  
Cambridge City Council  
Mill Road Depot  
Cambridge CB1 2AZ

Tel: 01223 457101  
Fax: 01223 457109  
E-mail: [simon.payne@cambridge.gov.uk](mailto:simon.payne@cambridge.gov.uk)

Tel: 01223 458510  
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The Divisional Commander  
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Cambridgeshire Constabulary  
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Tel: 01223 358966  
Fax: 01223 300380

Information Management Officer  
Cambridge City Council  
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Cambridge CB2 3QJ  
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Information Commissioner  
Wycliffe House  
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Wilmslow  
Cheshire SK9 5AF  
Tel: 01625 545700  
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