London Borough of Brent CCTV Strategy

Introduction

The London Borough of Brent operates 182 active CCTV cameras from its control room in the Brent Civic Centre. These cameras are used primarily for community safety, but are also used for the purposes of traffic and parking enforcement, housing estate monitoring, and environmental/fly tipping monitoring, among others. Brent also shares video feeds with external stakeholders such as Transport for London, the Metropolitan Police, and the borough of Camden to assist with their respective operations. During events at Wembley Stadium, Brent CCTV control room plays a key part in controlling access and egress for people and traffic.

The control room employs six full-time control room officers and one control room manager and is overseen by Brent's Community Safety and Emergency Planning service unit.

The London Borough of Brent has an overarching Community Safety Strategy which clearly defines the issues that partner agencies (including the Council, Metropolitan Police, London Fire Brigade, National Probation Service, Community Rehabilitation Company and Clinical Commissioning Group) have agreed to prioritise to enable partners to deliver services consistently. The Community Safety Strategy Vision is:

Making Brent a safe place to live, work and visit

Underpinning this vision are six priorities:

- Anti-Social Behaviour
- Tackling Gang Violence
- Violence against Women and Girls
- Reducing Reoffending
- Child Sexual Exploitation
- Tackling Radicalisation

These aims will be supported by the CCTV Strategy through continuing to work with our Community Safety partners in the Safer Brent Partnership to maintain enforcement activity and improve the feelings of safety of those living, working and visiting the Borough.

Vision

To enhance community safety, assist in developing the economic well being of the London Borough of Brent and encourage greater use of the town centres, estates and car parks.

Aims and Objectives

To achieve this Vision the key aims of the London Borough of Brent CCTV Strategy are:

1. Deter offenders from committing crime and disorder, including environmental crime.
2. Identify offenders and support criminal justice proceedings to help bring offenders to justice.
3. To ensure that all fixed and mobile CCTV is being used cost effectively and to its full advantage by reviewing, monitoring and continuing to investigate new and developing technology solutions, including but not limited to vehicle mounted cameras, wireless deployable cameras and Automatic Number Plate Recognition (ANPR) cameras.

4. Increase the public perception of safety.
5. Assist in traffic management
6. Support responses to the management of emergencies
7. Assist in town centre and event management

Context for the strategy

Brent last produced a CCTV strategy in 2007 and a technical review in 2013. It outlined the position of the system at the time, aims and objectives, and, in particular, proposals for the system expansion. Since then, the funding environment for CCTV has changed and focus has shifted from expansion to efficiency. The operating budget for CCTV is tightening while operating costs—notably transmission and maintenance costs—are rapidly increasing. To complicate matters, new legislation governing the use of CCTV for enforcement could drastically reduce the income generated by the service.

Key Onjectives

- We will reduce the number of fixed CCTV cameras, removing those that cannot justify their contribution to community safety
- We will increase the number of mobile deployable CCTV cameras, with a clear, transparent system in place for their deployment to areas of need.
- There will be no reduction in the total number of cameras available
- We will seek to gain efficiencies and advantages through better tendering and procurement arrangements, including the replacement of the oldest CCTV cameras
- We will develop opportunities to provide a monitoring service for the CCTV cameras of other organisations, including housing providers
- We will ensure compliance with the Surveillance Commissioner's CCTV Code of Practice
- We will explore opportunities for recruiting and training volunteer CCTV operators to complement existing staff
- We will explore the opportunities for sharing the CCTV service with another borough. By the end of the strategy period we will have a clear business case including any capital costs required for this transformation.

CCTV History and Background

Brent's CCTV service began in 1996 with the installation of four cameras along Wembley High Road to support crowd management and the prevention of disorder associated with the UEFA 1996 European Football Championship. Subsequent expansion through the later part of the 1990s followed within Wembley and also in Harlesden and Neasden and within the South Kilburn Estate.

In 2001 funding was secured from the Home Office for the capital costs of a scheme to cover parts of Kilburn High Road and further parts of the South Kilburn Estate.

With the opening of the new Wembley Stadium a further 30 cameras were installed to facilitate traffic and crowd management. From 2007-08 for four years the Council made available capital funding of £135k per annum for further expansion covering Willesden, Kingsbury and Church End. In 2009 the Council decided to use CCTV for enforcement of

Moving Traffic Offences and the network of cameras was further expanded to allow for enforcement at these sites.

Technological advancements allow the Metropolitan Police to view images directly from the police control centres at Hendon, Bow, Lambeth and New Scotland Yard. From Brent's control room, images can be sent directly to these locations, or locally to the police Integrated Borough Operations office at Wembley speeding up response times to incidents.

There are at present 182 fixed cameras in the Brent network.

Broadly speaking, Brent's cameras are in the correct locations to match demands from crime. Those that are not will be decommissioned.

Legal Context

Under section 17 of The Crime and Disorder Act 1998 the Council has a duty to exercise its various functions with regard to the likely effect on, and the need to do all it reasonably can, to prevent crime and disorder in it area.

Where this can be justified on planning grounds, the Council can require the provision of CCTV cameras by way of a condition or under a section 106 agreement, when granting planning permission for a new development.

Provision of CCTV for the purposes of traffic management and crowd safety would fall within the Council's powers under section 111 of the Local Government Act 1972 to do anything which is calculated to facilitate or is incidental to the discharge of any of its functions (with reference to its function of securing safe use of the public highway).

Any procurement of new CCTV cameras and associated maintenance services must be undertaken in compliance with the Council's Contract Standing Orders and the Public Procurement Regulations 2006 (the EU Regulations).

Article 8 in Schedule 1 to the Human Rights Act states that "everyone has the right to respect for his private and family life, his home and his correspondence". The use of CCTV could potentially constitute interference with a person's "private life". However, paragraph 2 of Article 8 permits such interference where this is in accordance with the law and is necessary in a democratic society in the interests of (inter alia) pubic safety, the prevention of crime and disorder or the protection of the rights and freedoms of others. Provision of CCTV under the powers referred to in paragraphs 5.1 to 5.4 above is clearly "in accordance with the law". The purposes for which CCTV is used as referred to in the Strategy are considered to fall within paragraph 2 of Article 8 but the Council would need to ensure that any future use can be justified as an interference with Article 8 rights.

CCTV has also been the subject of national debate following the introduction of the Protection of Freedom Act 2012 which set out a number of recommendations in relation to CCTV, including the appointment of a CCTV Regulator and publication of a Surveillance Camera Code of Practice. There have also been changes to existing legislation such as the Regulation of Investigatory Powers Act 2000 and Deregulation Act 2015 which have changed the way CCTV is used by local authorities.

Brent already has robust deployment and review processes in place to ensure that CCTV is used to the best effect for the community. However, CCTV alone is not a complete solution to any problem and is only one of the many measures used by the Community Safety Partnership to address issues being experienced by communities. The Council remains committed to ensuring that the limited CCTV resources available are used where appropriate to the best effect for the borough's residents and visitors.

When introducing the new Surveillance Camera Code of Practice to the House of Lords Minister for Criminal Information, Lord Taylor of Holbeach, said: 'The government favours the use of CCTV and automatic number plate recognition systems as a crime fighting and public protection tool. It supports the use of overt surveillance in a public place when it is in pursuit of a legitimate aim; necessary to meet a pressing need; and proportionate, effective, and compliant with any relevant legal obligations. Like the public, the government expects that where CCTV is deployed it is as effective as it can be in meeting its stated purpose and has appropriate privacy safeguards.'

The Protection of Freedoms Act 2012 set out a number of recommendations in relation to CCTV, and the subsequent Surveillance Camera Code of Practice was published in June 2013. The Surveillance Camera Code of Practice is intended to increase understanding of existing legal obligations in relation to the overt use of surveillance camera systems in public places, promote good practice and provide a single source of bespoke guidance, encouraging system operators to adopt the 12 guiding principles.

1. Use of a camera system must be for a specified purpose and necessary to meet an identified pressing need.

2. The use of a camera system must take into account its effect on the privacy of individuals, with regular reviews

3. There must be transparency, including a published contact point for access to information and complaints.

4. There must be clear responsibility and accountability for all system activities.

5. Clear rules, policies and procedures must be in place.

6. No more than the required images or information should be stored.

7. Access to retained images and information should be restricted with clearly defined rules on who can gain access and for what purpose.

8. 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.

9. Images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

10. 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.

11. Camera systems should be used in the most effective way to support public safety and law enforcement to evidential standard.

12. Any reference databases should be accurate and kept up to date.

The Surveillance Camera Code of Practice is also reflective of the existing Data Protection Act 1998 “Data Protection Principles” already adhered to by the London Borough of Brent CCTV System. These specify that personal data must be:

1. Processed fairly and lawfully.

2. Obtained for specified and lawful purposes.

3. Adequate, relevant and not excessive.

4. Accurate and up to date.

5. Not kept any longer than necessary.

6. Processed in accordance with the “data subject’s” (the individual’s) rights.

7. Securely kept.

8. Not transferred to any other country without adequate protection in situ

The London Borough of Brent CCTV service already has in place robust processes to ensure compliance with the relevant requirements set out in the Regulation of Investigatory Powers Act 2000 and Human Rights Act 1998. These are regularly inspected by the Office of the Surveillance Commissioner.

Deployment of Fixed CCTV cameras in Brent

A large proportion of the council’s CCTV provision was installed between 10 and 20 years ago, with the majority being installed as a result of Home Office funding. Whilst there is no longer a defined funding stream for CCTV, in the last five years additional cameras have been funded from various sources, including Transport for London and Regeneration projects. The cost of installing a single CCTV camera is usually £20,000 plus an additional £2,500 per annum in maintenance, electricity and transmission costs. The CCTV Service does not have an established budget to increase the current CCTV provision. Indeed, a more pressing need is to replace ageing cameras with modern stock; each camera has a recommended lifespan of around 15 years. The majority of Brent’s cameras are analogue with expensive and cumbersome transmission costs; a move towards replacing these with modern digital, HD cameras will be undertaken through the re-commissioning of Brent’s transmission circuit rentals.

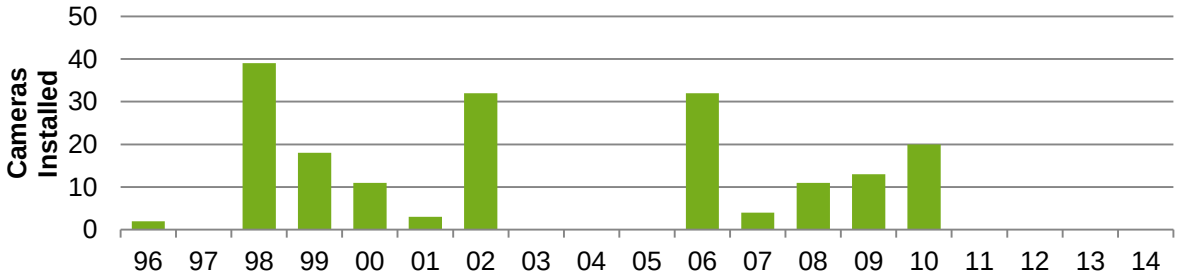


Figure 1: Brent CCTV- Year of camera installation

The most pressing requirement is ensuring the oldest cameras – which are often in the busiest locations – are adequately maintained or replaced. We are negotiating a renewal of our CCTV transmission contract which will include the replacement of 60 of our oldest, most-utilised cameras.

Requests for new deployments of CCTV cameras

The CCTV Service is regularly approached by partner agencies, internal council departments and Members to consider installing CCTV at new locations. Currently there is no budget available for the installation of new cameras and this is unlikely to change. The investment in mobile deployable technology (see below)

Deployable Mobile Cameras - Towards a more flexible CCTV service

With some cameras approaching their 20th year of operation, and others offering limited value either through poor placement, image quality or lack of proximity to crime hotspots, there is an opportunity to reduce the number of fixed cameras and replace these with mobile, deployable cameras, able to be moved into hotspot locations as part of a response to a crime or disorder trend. Modern 4G technology allows for high-resolution imagery and close operator control of mobile cameras. Without the requirement of underground cabling installation is relatively straightforward and costs are reduced.

A mobile 4G CCTV camera can be purchased for around £8,000 each as opposed to a fixed camera's £25,000 cost. While each location move has a cost of around £400, mobile cameras are unlikely to be moved more than four times a year; meanwhile the transmission costs of a fixed camera is likely to be around £400 a year per camera. Therefore there are both strong economic and tactical arguments in favour of a move to reduce the number of fixed cameras and increase the number of mobile deployable cameras. We do not anticipate reducing the total number of cameras operating in Brent, but instead will have a more flexible model of camera deployment.

Given the expense and inflexibility of fixed CCTV cameras, recently Brent has invested in seven deployable mobile cameras which can be installed at locations experiencing particular levels of crime and ASB. These cameras use 4G mobile technology to send the signal back to the control room.

Deployments are agreed through applications to the Local Joint Action Group (LJAG). This is a monthly partnership problem solving meeting which seeks to tackle location-based crime and disorder issues. Requests for CCTV have to be backed up with solid evidence demonstrating the scale of the issue and how CCTV will help resolve this, and be approved by the LJAG chair. Requests are then passed to the Mobile CCTV Committee who examine all bids and prioritise requests against current deployments.

A further 10 deployable cameras are likely to be added to the deployment roster by December 2015, taking the total available to 17. This will greatly increase the ability of the partnership to respond to incidents, and replace the ten fixed cameras due for decommissioning (see below).

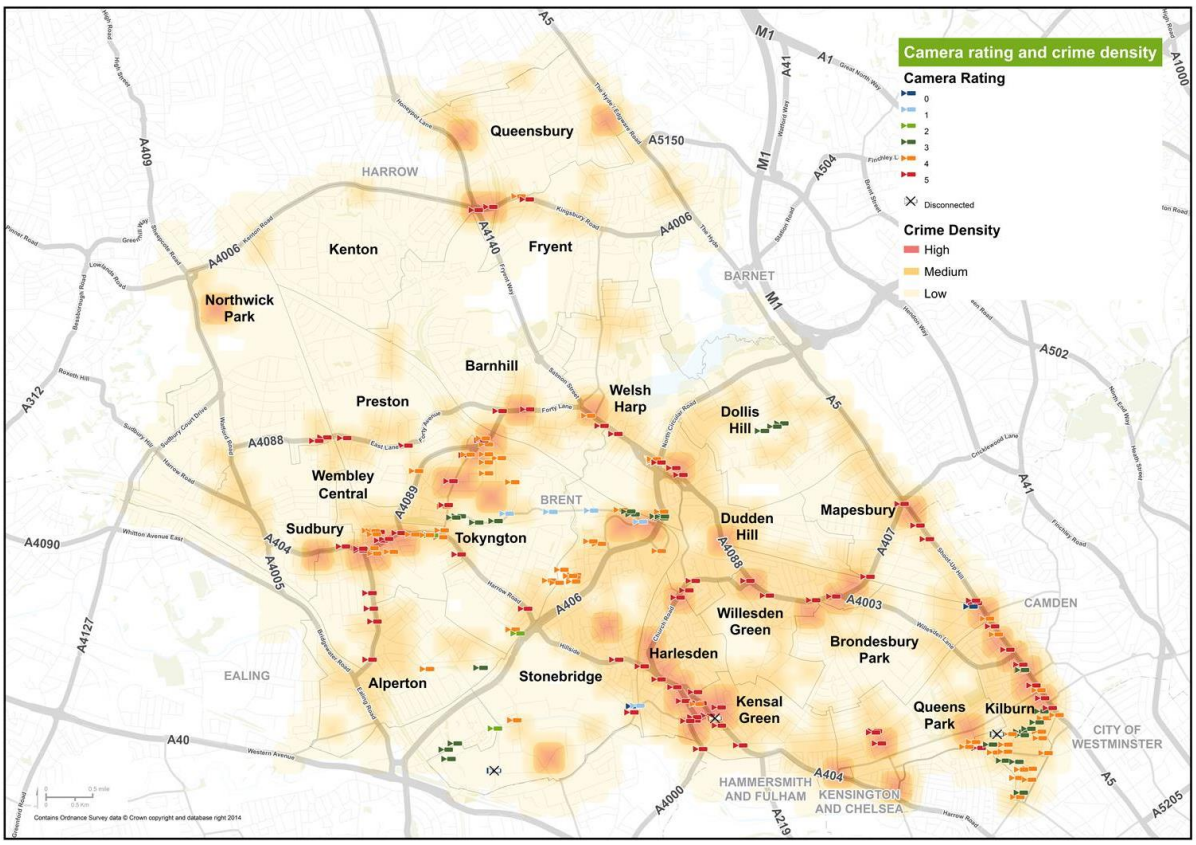
Usage and Needs Analysis

Each of Brent's 183 active cameras was reviewed in order to establish their relative "importance". A five-point scale was used to quantify this importance against a set of standard metrics. For each metric, cameras were assigned a score of 1 or 0—1 if the camera "passed" the metric and 0 if it did not. The sum of the scores for each camera provides an indication of its importance. Cameras with the highest scores are those that are most important to the borough and those with the lowest scores are those that are candidates for decommissioning.

The following points explain the metrics used to rank each of the borough's cameras:

- **Control Room Usage:** Control room officers were asked to assign each camera a rating of red (high priority—used by the CCTV team on a daily basis), amber (medium priority—used on an infrequent basis by the CCTV team, but sited in a strategic location), or green (low priority—used by the CCTV team on an *ad hoc* basis or used mainly by Wembley stadium). Cameras rated red or amber were given a score of 1; cameras rated green were given a score of 0.
- **Enforcement Usage:** Cameras that are actively used by the Parking and Traffic Enforcement team were given a score of 1, while all others were given a score of 0. It should be noted that this represents usage as of November 2014.
- **Equality:** The Equality Act, 2010 requires authorities to consider the impact of their services on the protected characteristics of age, race, ability, gender, marriage /civil partnership, sexual orientation and religion/belief. To comply with this guideline, cameras were assigned a score of 1 if they served a purpose specific to one or more of these protected groups and 0 if they did not.
- **Legitimate Aim and Pressing Need:** As described in chapter **Error! Reference source not found.**, the Surveillance Camera Code of Practice requires that each operational camera to have a demonstrable "legitimate aim and pressing need". With the assistance of the control room manager, cameras were assigned a score of 1 if they demonstrated a legitimate aim and pressing need and 0 if they did not.
- **Contribution to Community Safety:** Cameras were allocated a score of 1 if they were viewed as having a positive contribution to community safety on the basis of conversations with control room staff and analysis of crime patterns over the last three years.

The map below summarises the scores for each of Brent's cameras and maps them against the intensity of criminal activity in the borough (as reported by the Metropolitan Police Service). Generally speaking, the most important cameras are those in high-crime neighbourhoods; this suggests that these cameras contribute more significantly to community safety by monitoring criminal activities in these areas. 85% of crime is committed in 5% of the surface area of the borough; the fixed CCTV camera resources are aligned to these permanent hotspot locations.



The table below summarises the cameras that were assigned scores of 0, 1, or 2—that is, those cameras that show potential for decommissioning or relocation. These cameras are located in areas of low criminal activity or are poorly situated from the perspective of visibility.

Cameras Eligible for Decommissioning or relocation

LBB #	District	Location	Score
103	Kilburn	Christchurch Avenue	0
161*	Wembley	Drury Way/Great Central Way	1
162*	Wembley	Hannah Close/Great Central Way	1
163*	Wembley	South Way/Fourth Way	1
164*	Wembley	Gate 5/South Way	1
174	Stonebridge	Argenta Way	2
178*	Wembley	Brent House Access Traffic Barrier	2
217	Harlesden	Winchelsea Road	0
218	Harlesden	Minet Avenue/Acton Lane	1
225	Park Royal	Twyford Abbey Rd. At Rainsford Rd.	2

Note: Asterisks denote cameras used by Wembley Stadium

Five of these cameras are used by the Wembley Stadium control centre for security operations during major events. As such, it is not feasible for them to be decommissioned or relocated. However, the Borough could absolve itself from responsibility for the maintenance of these cameras by donating them to the stadium. Discussions have already commenced with Wembley Stadium about transferring these cameras alongside the Olympic Way Public Address system to their control.

It is also worth noting that there are some high-crime locations that are not covered by the CCTV system. These include Kensal Green (Kensal Green Underground station), Kensal

Town (Harrow Road and Ladbroke Grove), and Harlesden (Stonebridge Park). These identified high crime areas will be reviewed with stakeholders, such as the Police, TfL and housing providers, to assess the contribution the CCTV service can make in assisting in crime reduction. These areas will be prioritised for the deployment of mobile cameras in response to emerging crime and disorder issues.

Redundant cameras

A redundant camera is one whose viewshed (the area visible by the camera) overlaps considerably with the viewshed of one or more other cameras. Identifying these cameras presents an opportunity to increase the number of cameras to be decommissioned/ repurposed or, additionally, reduce the number of cameras to be replaced. Geographic information system tools can be used to analyze the viewshed of a camera and compare it to the cameras around it.

In order to demonstrate this concept, we have identified three sites where there are multiple cameras in close proximity, these are;

- cameras 199, 200 and 235;
- cameras 21, 232 and 17316 (TfL); and
- cameras 166 and 243.

Results of these viewshed analyses are shown in the maps below.

Figures 2 and 3 clearly shows that the TfL camera (17316) has the most superior coverage area. The visible area of Brent cameras 21 and 232 is almost completely overlapped by the TfL camera. In this instance there is the potential to decommission camera 232 without having a significant effect on the overall coverage. Camera 21, should however be kept as it is used for Bus lane enforcement, but can be replaced by a fixed camera unit. The other exhibits show similar circumstances.

In addition to the example shown here viewshed analysis could be used for a range of other applications relevant to Brent. For example:

- Optimising camera location: viewshed could be used to compare the visible area of candidate installation locations to maximise coverage/ ensure a particular location is in view
- Improving resting location: viewshed could be used to compare the visible area of a camera at varying resting locations. This could be used to maximise coverage/ ensure a particular location is in view

It should be noted that the examples shown here are conceptual. In order to effectively perform this analysis, data such as maximum effective viewing distance, dwell zones, tilt angles, building heights, blind spots (e.g. tree canopies), building heights etc. need to be available. Not all of this data was available at the time of writing, so the figures may not be indicative of real-world conditions. However, this technique has the potential to identify significant efficiency and effectiveness improvements if more recent or reliable data is made available.

Figure 2: Viewshed Analysis of Cameras 21, 232, 17316 (TfL)

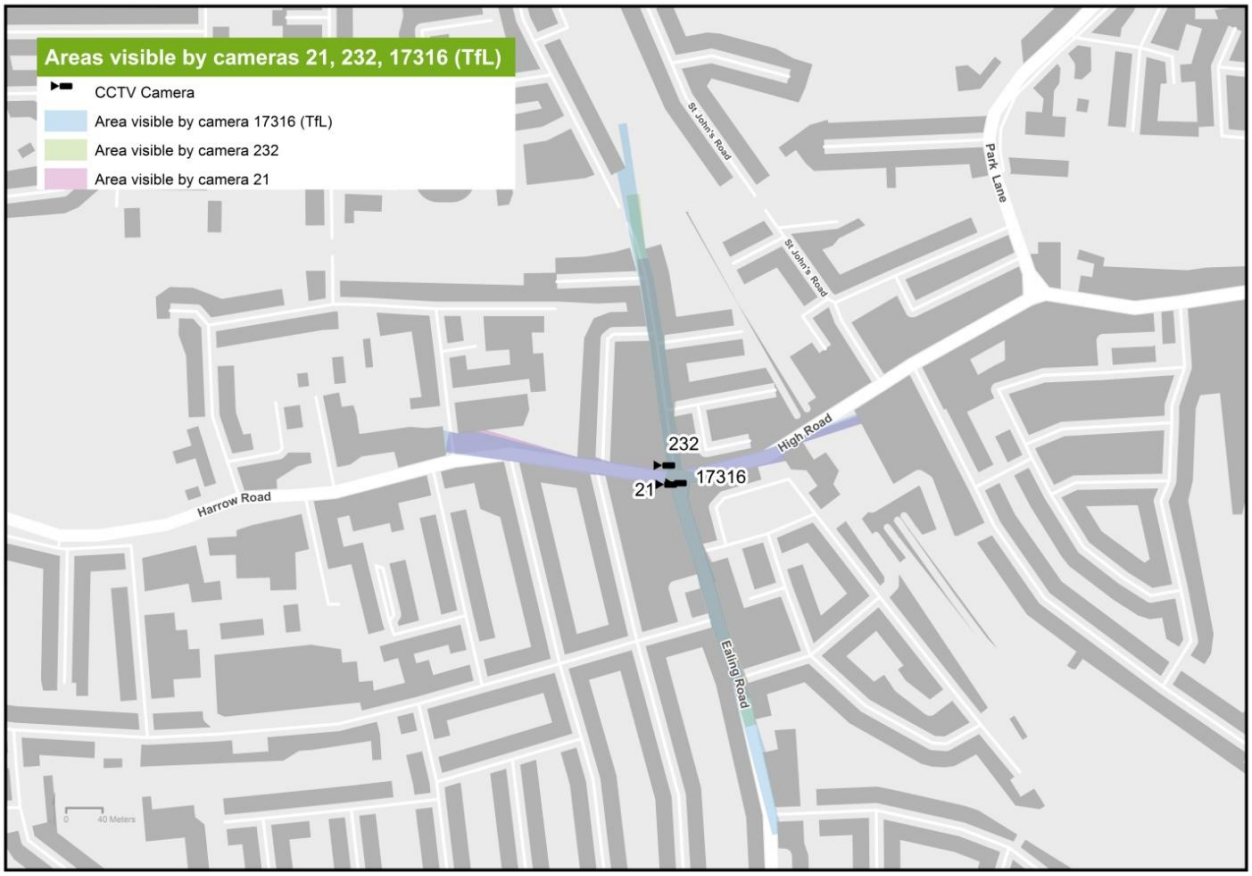
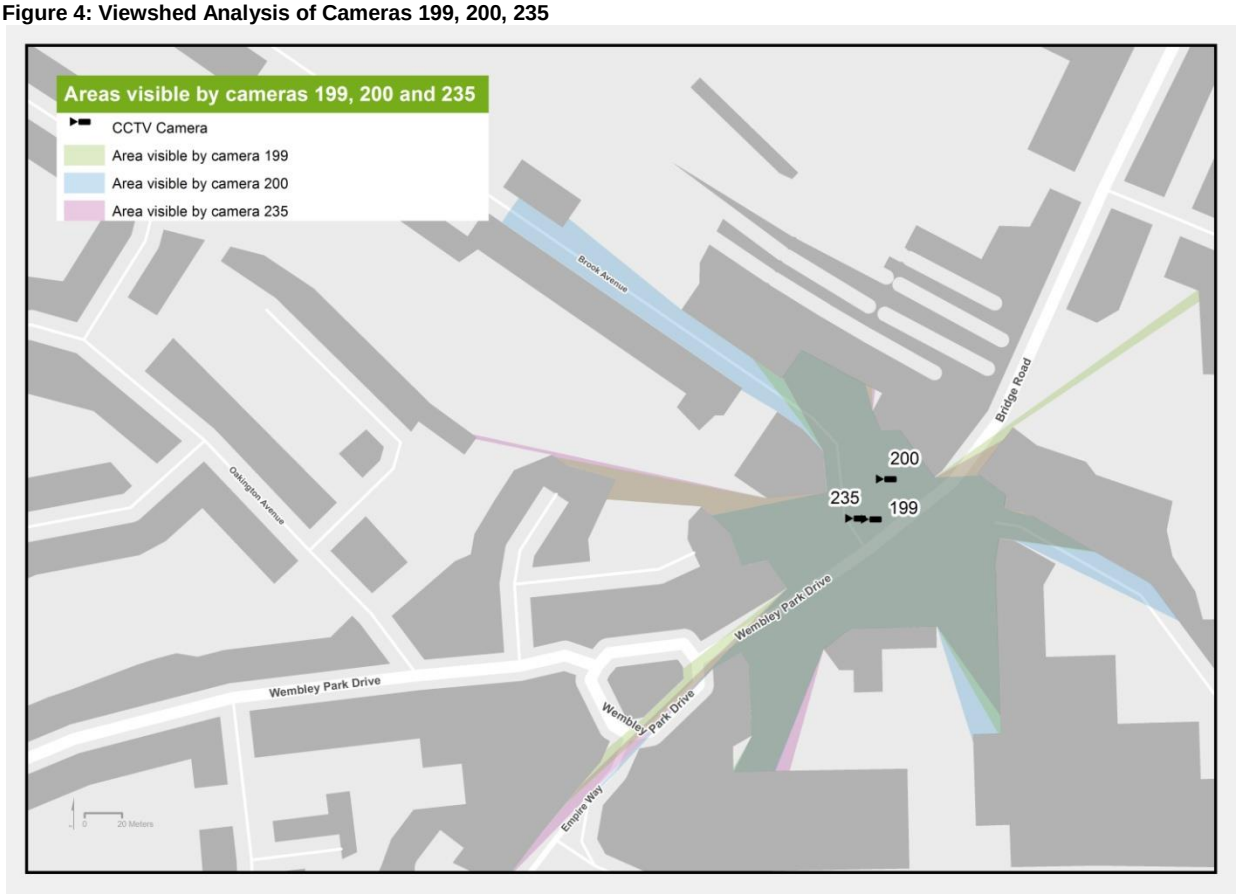


Figure 3: Viewshed Analysis of Cameras 166, 243

Figure 4: Viewshed Analysis of Cameras 199, 200, 235



Improving CCTV efficiency

A 2014 review of Brent's CCTV found potential efficiencies to support the long-term sustainability of the CCTV service. These include:

- Decommission or re-locate 10 CCTV cameras
    - Ten cameras have been identified through analysis as providing little return for the ongoing costs of transmission and maintenance. They will be offered to Wembley Stadium (where relevant) or bagged. This will save £17,500 per annum in transmission and maintenance costs.
    - The identified cameras are:

Camera number	Area	Location
103	Kilburn	Christchurch Avenue
161*	Wembley	Drury Way/Great Central Way
162*	Wembley	Hannah Close/Great Central Way
163*	Wembley	South Way/Fourth Way
164*	Wembley	Gate 5/South Way

174	Stonebridge	Argenta Way
178*	Wembley	Brent House Access Traffic Barrier
217	Harlesden	Winchelsea Road
218	Harlesden	Minet Avenue/Acton Lane
225	Park Royal	Twyford Abbey Rd. At Rainsford Rd.

Negotiate a discounted transmission contract extension and conduct a detailed study of future options

The current transmission contract is being renewed and will include a provision for the replacement of Brent's oldest cameras – see below.

Renegotiate maintenance contract and reduce preventative maintenance visits

The existing maintenance contract expires in September 2015 and renewal will place lesser emphasis on preventative maintenance.

It is proposed that we seek to roll the contracts for maintenance and transmission into a single contract from 2017. This should produce further savings through economies of scale.

Replace existing 3G cameras with new 4G rapid re-deployable cameras

Eleven 4G cameras have been purchased and will replace the existing 3G cameras; a further eight cameras will be in service by the end of 2015. These deployable cameras are much-used and support an operational response to ongoing location-based issues.

Align Operator Shifts to Demand

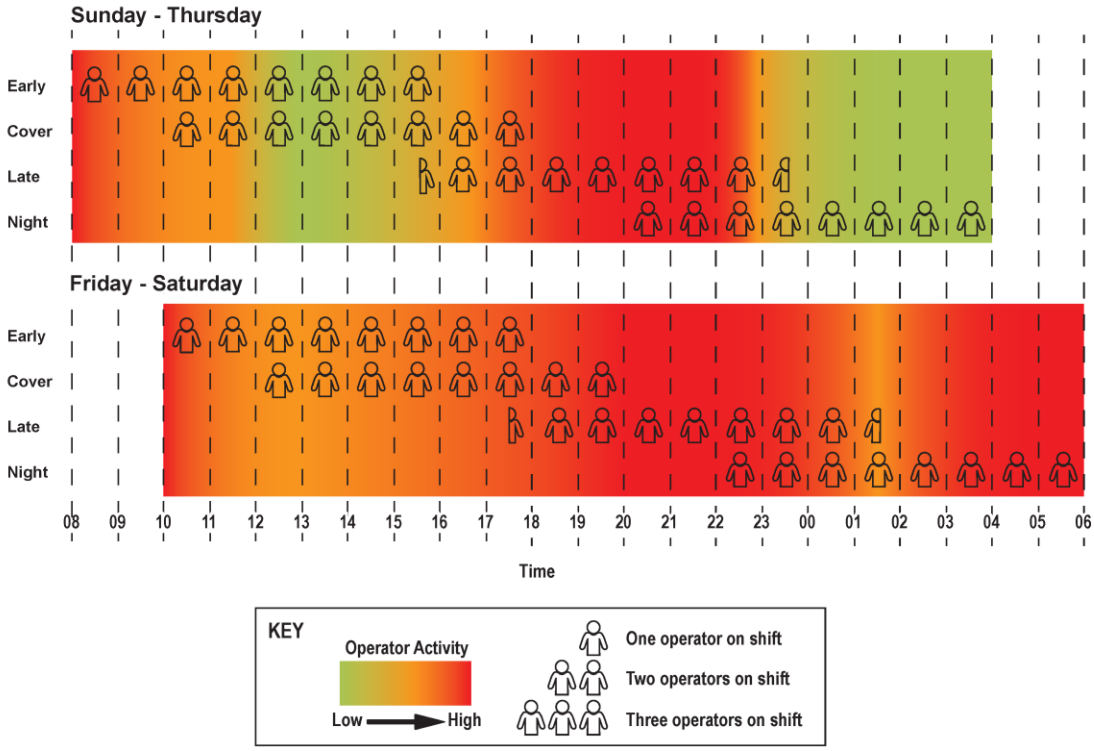
The CCTV control room is staffed by six control room officers, one senior control room officer, and one control room manager. Control room officers are currently assigned one of four shifts:

- Early (8:00–16:00 Sunday–Thursday; 10:00–18:00 Friday–Saturday)
- Cover (10:00–18:00 Sunday–Thursday; 12:00–20:00 Friday–Saturday)
- Late (15:45–23:45 Sunday–Thursday; 17:45–1:45 Friday–Saturday)
- Night (20:00–4:00 Sunday–Thursday; 22:00–6:00 Friday–Saturday)

This leaves the control room unmanned for four hours each day except Friday morning (six hours) and Sunday morning (two hours). Although not ideal this was a direct result of a consultation with the Police as part of a previous cost cutting exercise.

To assess the degree to which the control room's busiest hours are covered by staff, control room officers were asked to rate their activity over the course of a typical day. Activity level was assigned a value between one and five, where one described low intensity periods (when control room officers could, for example, catch up on paperwork) and five described extremely high-intensity periods (when control room officers are responding to multiple incidents simultaneously). These ratings are combined in Figure and shown against current shift patterns.

Figure 5: Control Room Officer Shift and Activity Patterns


Sunday - Thursday
Early
Cover
Late
Night
Friday - Saturday
Early
Cover
Late
Night
08 09 10 11 12 13 14 15 16 17 18 19 20 21 22 23 00 01 02 03 04 05 06
Time
KEY
Operator Activity
Low
High
One operator on shift
Two operators on shift
Three operators on shift

At some points during the day, shifts are poorly matched to reported activity levels. In particular, the two-hour period between the end of the cover shift and the start of the night shift leaves a single control room officer during one of the busiest times of day. Conversely, two shifts overlap during low-activity periods in the early afternoon. As a result of this analysis, shift patterns have been changed to increase staffing levels at peak times. However this would also be an opportunity for volunteer operators (see below) to complement staffing.

Control room officers also reported difficulties meeting police demand during the early morning hours on weekends. Some nightclubs close well into the morning, after which police typically begin responding to incidences of anti-social behaviour and criminal activity. This occasionally causes control room officers to have to work past the scheduled 6 a.m. end of the night shift.

Increasing the capacity through the recruitment and training of volunteer CCTV operators (see below) at these peak times will be explored through the period of the strategy.

Formalise and redesign processes

Suggestions made to operator processes have been undertaken and are currently being trialled.

We will develop a standardised operating model and improved internal documentation to provide a more consistent and efficient delivery of services.

The layout of the control room has been identified as being unsuitable for operations. Given the forthcoming move of parking CCTV to unmanned operations, it is proposed to reconfigure the rooms in this area (control room, BECC, digital post room, parking CCTV office) in order to create a more efficient control room. The BECC currently occupies a significant area and could be sacrificed for a stronger control room, with BECC duties being given to a standard meeting room, as happens in many other local authorities.

Upgrade to Digital HD Cameras

Retendering of the transmission contract in 2016 will seek to incorporate the provision of 66 new digital HD cameras to replace the oldest stock. By including the provision of cameras in the contract for transmission services at each renewal, the entire camera stock can be upgraded and replaced over a six-year period.

Estate Monitoring

A Housing Provider has signed the first estate monitoring contract and further work to identify opportunities is being undertaken. Income from estate monitoring will be offset against capital expenditure.

Improving Communications

We will endeavour to update the CCTV pages on the Brent website to ensure residents are aware of our CCTV network and our strategy, and the processes by which deployments are made.

Involving Active Citizens

There is great public interest in CCTV in Brent, with demand for CCTV as a response to crime issues high from members of the public and explorations of citizen-run CCTV systems being undertaken by citizen groups. While this is legally challenging to be included within Brent's network, we will seek to build on the enthusiasm for CCTV by instigating an element of volunteer support, whereby residents can undergo training in order to become volunteer CCTV operators, providing additional capacity for paid staff at peak times.

Future Options

Throughout the duration of this strategy we will explore the opportunity to share the CCTV service with another borough or another provider. The London Boroughs of Enfield, Barnet and Waltham Forest have an agreement to use a single control room at Edmonton and this is an option we will explore in the longer term. Similarly Ealing are likely to construct purpose-built accommodation for their CCTV and out-of-hours service and this may also provide an opportunity for Brent to share services.

Bringing services together in this fashion requires a capital investment which is not available at the present time, but a clear agreement of the possibilities open to us would enable a bid for capital expenditure to be made. Sharing services would create efficiencies and provide an opportunity for significant savings, as well as potentially freeing up space within the Civic Centre.

Vehicle-mounted CCTV

CCTV enforcement – parking

CCTV was used to enforce parking, bus lane and moving traffic restrictions in Brent, and supplemented the traditional method of enforcement by CEOs. Footage captured by fixed cameras was used to issue PCNs in locations where CEOs had previously found it difficult to enforce. Camera enforcement signs were displayed in these areas to alert motorists to active CCTV, and encourage compliance with local restrictions.

Compared to 2013/14, the issuance of PCNs for bus lane contraventions doubled in 2014/15; and moving traffic contraventions increased by 14%. This in part reflects the overcoming initial teething issues caused by moving to a new enforcement suite in Brent Civic Centre in July 2013; and the introduction of efficient unattended camera systems. Unattended camera systems ensure that enforcement is concentrated on a specific restriction for the duration of the camera's operational hours. This means that the Council are now able to apply a zero tolerance enforcement regime to bring about compliance with bus lane and moving traffic requirements.

CCTV PCN issuance for parking contraventions remained broadly unchanged from the previous year.

The Council continues to use CCTV enforcement for a number of purposes. New operational guidance introduced by central Government in April 2015 has restricted the use of CCTV for enforcing parking (as opposed to moving traffic) offences. These changes mean that in most

circumstances a parking PCN may only be issued by fixing it to the offending vehicle or handing it to the person who appears to be in charge of the vehicle.

Since CCTV parking enforcement relies on serving the PCN by post, it may no longer be used except in specified circumstances. These are:

- if the CEO has been prevented (for example by force, threats of force, obstruction or violence) from serving the PCN;
- if the CEO had started to issue the PCN but did not have enough time to finish or serve it before the vehicle was driven away, and the CEO would otherwise have to write off or cancel the PCN;
- where the contravention has been detected on the basis of evidence from an "approved device".

An "approved device" is a camera and associated recording equipment which has been approved by the Secretary of State for Transport. PCNs for parking contraventions may not be served by post on the basis of evidence from an approved device other than when vehicles are parked on:

- a bus lane;
- a bus stop clearway or bus stand clearway;
- a Keep Clear zig-zag area outside schools; or
- a red route.

Certain contraventions (such as double parking, footway parking and parking in areas where stopping is prohibited) are difficult to enforce by CEOs on foot because the driver often remains close to the car and can move the vehicle if a CEO is seen approaching. Because CCTV may no longer be used to enforce against these contraventions, the Council has increased the level of on-street enforcement by redeploying some CEOs who were previously used to issue camera-based PCNs.

CCTV enforcement - moving traffic contraventions

In order to support the Council's policy of encouraging sustainable form of transport, the Parking service provides stringent enforcement of bus lanes in order to secure faster journey times for bus users.

In addition, the Council has adopted powers available under the the Traffic Management Act 2004 to undertake civil enforcement of a number of moving traffic offences. Yellow Box Junctions, prohibited turns, and no-entry signs are all examples of moving traffic violations actively enforced by the service. Such restrictions are in place to ease congestion on the borough's roads, and improve road safety.

CCTV enforcement is co-ordinated from an enforcement suite in Brent Civic Centre.

Mobile CCTV

The Council has retained the use of mobile CCTV for school Keep Clear markings. During the rest of the day the vehicles are used for enforcement at bus stops and for intelligence gathering.

Growth in unattended cameras

The installation of 10 unattended cameras is a workstream within the One Council Parking programme. £975k worth of savings are expected for 2015/16.

Thirteen cameras have been ordered. Ten of these have been provided through the One Council Parking programme; the other three have been funded from Section 106 agreements at specific locations. Works to progress installation of all 13 cameras are being managed as a single project. Details of the installation progress of these cameras – and their purposes – can be found below.

Location:			Power	Camera Install		Signage	Go Live			
Location:	Junction With:	Contravention:	Power install complete?	Camera install complete?	Camera config complete?	Signage Ok?	2 weeks monitoring complete?	Camera live	Go Live date	Comments/Update
High Road, Wembley	Lancelot Road	Banned right turn from High Road, Wembley into Lancelot Road	Yes	Yes	No	Yes	Yes	No		Low level of contraventions captured, final adjustments made - results to be confirmed 21/08/2015, live PCN to commence once Client has approved Test PCN.
Chamberlayne Road	Bolton Gardens	Banned right turn from Bolton Gardens into Chamberlayne Road	Yes	Yes	No	Yes	Yes	No		Final review due 17/08/2015. Issue with remote connection to unit; aiming for unit to be re-installed 21/08/2015. Signage considered compliant but repeater sign due to be installed as good practice
High Street	Wendover Road	Banned Right turn from High Street into Wendover Road	Yes	Yes	Yes	No	Yes	No		Unit configured. Outstanding signage issue with missing 'banned right turn' sign (being followed up by Transportation); and a broken repeater sign on the traffic light (Transportation have escalated to TfL)
Glacier Way		Mandatory left turn onto Glacier Way	Yes	Yes	Yes	Yes	Yes	Yes	20/07/2015	Live enforcement - 760 cases uploaded 20/07/2015 - 18/08/2015, 30 days - average 25 cases per day. £21.9k already paid
CHALKHILL ROAD	into Blackbird Hill.	Compulsory Left-turn	Yes	Yes	No	Yes	No	No		Camera installed 16/08/2015; Awaiting feedback on 1st review of config.
Un-named link road	linking Birse Cres. & Neasden Lane underpass	No Entry except buses	Yes	Yes	Yes	Yes	Yes	Yes	13/08/2015	Low level of contraventions captured; situation to be kept under review. Potential contingency sites to be identified
CHURCH ROAD	High Road, Willesden and Neasden Lane.	Buses and Cycles Only	Yes	Yes	Yes	Yes	No	No	24/08/2015	Client has approved "test" PCN. Warning Notice period to end 23/08/2015, Live PCN to be issued from 24/08/2015
St Johns Road (Wembley)	into High Street, Wembley (the A404)	Banned Right Turn	No	No	No	Yes	No	No		Snagging issue with power install. Contractor advised, pending confirmation of power install completion. 2 weeks warning
Kings Drive	Forty Lane	Banned right turn	Yes	Yes	No	Yes	Yes	No		Camera installed 16/08/2015; 1st config review due 19/08/2015; Clips to be pushed to review W/C 24/08/2015
Abbey Road	Twyford Abbey Road	Bus Gate	No	No	No	Yes	No	No		Power supply fault affecting the column on Abbey road. Contractor expected to remedy by 23/08. 2 weeks warning notice commenced 07/08. Camera is a nightime install

Adherence to CCTV Codes and Standards

CCTV systems are subject to legislation that aims to protect the public's privacy from undue monitoring and surveillance. This includes the Data Protection Act (1998), the Regulation of Investigatory Powers Act (2000) and the Protection of Freedoms Act (2012). It is important for organizations operating CCTV to be compliant with the provisions of these laws to protect themselves from legal action and to uphold the privacy of the residents and businesses that they monitor. To this end, there are three major publications of best practices to guide regulatory compliance:

- The Home Office **Surveillance Camera Code of Practice** (June 2013) provides guidance on the appropriate use of CCTV per the requirements of the Protection of Freedoms Act (2012). This legislation stipulates that local authorities must have regard to the code in the when operating their CCTV systems.

- **In the picture: A data protection code of practice for surveillance cameras and personal information** is published by the Information Commissioner's Office (October 2014) pursuant to the Data Protection Act (1998) and updated to reflect later regulatory developments. This code is consistent with the Home Office code, but has a more significant focus on the protection of personal data. It also has a broader scope than the Home Office code: it must be adhered to by both private and public sector CCTV systems.
- **British Standard 7958:2009** (CCTV Management and Operation Code of Practice) is a voluntary standard published by the British Standards Institute—a non-governmental body. It provides guidance based on the provisions of the Data Protection Act (1998), Human Rights Act (1998), and Freedom of Information Act (2000). A new version of the code will come into effect in 2015.

The Surveillance Camera Code of Practice

This document provides 12 guiding principles against which CCTV authorities should align their operations. These principles emphasise that all CCTV systems must operate towards a "legitimate aim" due to a demonstrable "pressing need". Furthermore, each CCTV operation must be governed by clear rules and regulations that aim to limit privacy impacts while also providing for clear responsibility and accountability for the system. Finally, there is emphasis on the need for regular review of CCTV systems in order to ensure continued compliance with the principles.

Brent's CCTV operations require the actions below to take place to ensure compliance with this code:

- Principles 2 and 10 outline the need for annual reviews (including camera-by-camera privacy impact assessments) as well as audit mechanisms to ensure that legal requirements are met. The mechanisms to complete these audits and reviews are currently being developed.
- Principle 3 highlights the importance of transparency for a CCTV system and specifically speaks to the need for a formal complaints process and availability of system information. The CCTV pages on the Brent website have been rewritten and will be further developed.
- Principle 5 covers the area of clear and precise procedural rules to govern the management and operation of the system. A new procedural manual is currently being written.

In the Picture

This code is complementary to the Home Office code and is based on the principles of the Data Protection Act (1998). Generally speaking, these principles focus on maintaining the privacy of individuals through the effective management of surveillance systems. Since the ICO code is complementary to the Home Office code, major areas of deficiencies are similar. Other major components for review include:

- The sharing of information with external stakeholders (e.g. MPS, traffic enforcement) requires explicit arrangements regarding the responsibility of each agency with regards to data privacy and security;

- The siting of surveillance cameras such that the amount of space that is not relevant to the purpose of the system is minimised (this can be accomplished through the viewshed analysis described above).

- The security of wireless data transmission (e.g. microwave and 3G) against unwanted interception; and
- The adequacy of obvious signage that:
  - notifies the public that they are under CCTV surveillance; and
  - provides contact information for the control room.

Action Plan

OBJECTIVE	KEY ACTIVITY	PROGRESS MILESTONES	SUCCESS CRITERIA
We will reduce the number of fixed CCTV cameras, removing those that cannot justify their contribution to community safety	Analyse camera usage of all 183 fixed cameras Prepare list of decommissioning Organise decommissioning and bagging of redundant cameras	Produce "league table" of camera usefulness Agree decommissioning process Inform relevant stakeholders of decommissioning Agree process for physically decommissioning and bagging camera, including contracting provider	All cameras deemed to be not contributing to community safety decommissioned
We will increase the number of mobile deployable CCTV cameras, with a clear, transparent system in place for their deployment to areas of need.	Procure 10x 4G mobile cameras Agree deployment prioritisation process	Procurement of additional cameras Cameras deployed in hotspot areas Evaluation criteria agreed and in place	
We will seek to gain efficiencies and advantages through better tendering and procurement arrangements, including the replacement of the oldest CCTV cameras	Procure new CCTV maintenance contract Procure new CCTV transmission contract to include replacement of the oldest cameras		
We will develop opportunities to	Agree contracts for		

provide a monitoring service for the CCTV cameras of other organisations, including housing providers	the monitoring of external providers' cameras		
We will ensure compliance with the Surveillance Commissioner's CCTV Code of Practice	Develop programme of work to ensure compliance		
We will explore opportunities for recruiting and training volunteer CCTV operators to complement existing staff	Agree recruitment and training programme through the volunteering hub		