
CERTIFICATION ASSESSMENT REPORT

Surveillance Camera Code of Practice (June 2013), issued pursuant to
Section 30 of the Protection of Freedoms Act 2012

Applicant: London Borough of Brent
Community Protection

Address: Regeneration & Environmental Services,
Brent Civic Centre,
Engineers Way,
Wembley,
London HA9 0FJ

Companies House Reg: n/a
Client Ref: LOND362

Assessment Phase: Initial Assessment

Date(s) of assessment: 31st January, 2017

	<u>Name</u>	<u>Position</u>
Assessment Team:	Stephen Grieve	Scheme Manager
Client Representatives:	Alvin Wakeman	Control Room Manager

If this report is to be shown to a third party, then the whole report must be shown including details of any non-conformances.
The contents of this report and notes taken will be treated as confidential by SSAIB and by UKAS who may review this information.

An Electronic copy of this report has been provided to the client

Signed: 
Print Name: Stephen Grieve, SSAIB Lead Assessor
Date: 31st January, 2017

Assessment Objectives

To demonstrate conformance with the requirements of the Surveillance Camera Code of Practice, (June 2013).

Scope of Assessment

This initial assessment was carried out with reference to the Surveillance Camera Code of Practice (June 2013) and follows an earlier Desktop Review, conducted on 12th January, 2016. The scope of the assessment was as stated and conducted at the London Borough of Brent, Community Protection, Regeneration & Environmental Services, Brent Civic Centre, Engineers Way, Wembley, London HA9 0FJ.

Limitations

This assessment was based on a sampling process and therefore we cannot guarantee that all system non-conformances have been identified. The client should recognise possible departures from conformance with the standard and also their own requirements and address these through their internal auditing and corrective and preventive action processes.

Recommendation / outcome: Certification by the Surveillance Camera Commissioner is recommended pending acceptance of this report by their reviewer.

Summary of Assessment

The assessment confirmed that the London Borough of Brent owns, manages and operates a CCTV surveillance camera scheme in accordance with the recommendations of the Surveillance Camera Code of Practice (June 2013).

The assessment follows an earlier Desktop Review that was conducted on 12th January 2016 and this report should be read in conjunction with that earlier report. No non-conformances were raised during that Desktop Review and similarly none have been raised at this assessment. All of the four Opportunities for Improvement raised during the Desktop Review have been adequately addressed, while a further six have now been raised from this assessment. These findings are reported in further detail below.

The CCTV surveillance camera scheme operated by Brent Council is subject to detailed policies, procedures and guidance that are set out in a key document entitled '**Code of Practice to regulate the operation of the Closed Circuit Camera Surveillance System Managed by Brent Council and Partners**' and dated November 2015. This document is available to read and download at a dedicated Council webpage at <https://www.brent.gov.uk/your-community/crime-and-community-safety/cctv-in-brent/> along with a related CCTV Strategy, a map of deployable CCTV locations by Ward, and an interactive map of the Borough.

The Organisation

The London Borough of Brent is a 'relevant authority' within the meaning of Section 33 of the Protection of Freedoms Act 2012 and operates a CCTV surveillance camera scheme as defined by Section 29 of the Act. The Council is responsible for the control, management, administration and security of the scheme.

The Council is the Data Controller for the scheme and is duly registered with the Information Commissioner's Office under registration number Z5621554, which expires on 30th August 2017.

A large proportion of the Council's CCTV provision was installed between ten to twenty years ago, with the majority being installed as a result of funding made available from the Home Office. While there is no longer a defined funding stream available for CCTV, in the previous five years additional cameras have been funded from a variety of sources, including Transport for London and Regeneration projects.

The current scheme comprises a total of 203 public space surveillance cameras across two separate CCTV systems, namely, 182 standard PTZ cameras at fixed locations across the Borough and 21 re-deployable PTZ cameras. All of these cameras are monitored on a 24/7 basis from the dedicated CCTV Room located within Brent Civic Centre. The Council operates a policy of achieving greater flexibility and value for money by replacing fixed cameras with re-deployable types, without reducing the overall total number available to the scheme.

The development or use of surveillance camera systems (Principles 1 – 4):

Principle 1

The surveillance camera scheme in use by the Council has been established on the basis of powers granted under Section 17 of the Crime and Disorder Act 1998, by which 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 its area. This reflects the purpose of the scheme as defined in the ICO registration as *'Crime prevention and the prosecution of offenders including the use of CCTV'* and is relevant for the 1st Principle of the Data Protection Act, as further defined in paragraph 5(d) to Schedule 2. No extension to the original stated purpose of the scheme has occurred.

The 'Code of Practice' (CoP) and a separate Operators Procedures Manual (OPM) both reflect the same purpose and provide an accurate description of the Council's management and use of both CCTV systems. The CoP is a strategic document, which helps to govern the management of the CCTV elements of the Control Room and facilities of the fixed and re-deployable CCTV systems. Combined with the OPM, Metropolitan Police Operational Procedures, etc. the CoP sets out to ensure the most effective use of CCTV to prevent crime and identify perpetrators of crime.

Use of the re-deployable CCTV system is agreed through application to a Local Joint Action Group, a monthly partnership problem solving meeting which seeks to tackle location-based crime and disorder issues.

Principle 2

Brent Council has yet to complete a Privacy Impact Assessment (PIA) that covers these fixed and re-deployable CCTV systems, however, they are utilising the 'Level 1 and Level 2' template now increasingly being adopted by CCTV Managers across the London Boroughs. In addition to providing (at Level 1) a response to a range of questions under the Data Protection Act, Human Rights Act and Surveillance Camera Code of Practice the PIA also provides (at Level 2) a definition of camera types being utilised; a location assessment; and a listing of specific cameras where additional mitigation has been required to ensure that privacy is maintained in line with the requirements of Article 8 of ECHR (**see Opportunity for Improvement 01**).

The CCTV systems, including the re-deployable cameras, make no use of audio recording, facial recognition or other biometric recognition systems.

Principle 3

The Council provides a webpage dedicated to information on its use of CCTV at <https://www.brent.gov.uk/your-community/crime-and-community-safety/cctv-in-brent/> including a downloadable copy of the CoP, a separate CCTV Strategy and various locations maps for both the fixed and deployable systems, supported by an interactive map for confirming the location of each of the fixed cameras. The webpage also provides a dedicated email address for CCTV enquiries as well as a generic postal address and telephone number. It is Council policy not to provide separate addresses or telephone numbers for the various functional departments in order to best manage customer service. The webpage also makes clear that recorded images are retained for a period of 31 days and that unless there is a requirement to keep them they will then be erased.

The webpage also provides separate links to request to view CCTV images and similarly provides further links to more detailed information on the Data Protection Act and Freedom of Information Act. A further link also provides access to a separate webpage for making a complaint against any Council services, including CCTV. No complaints in relation to the CCTV scheme have been recorded in the past twelve months (**see Opportunity for Improvement 02**).

In 2015 the current CTV scheme was subject to an independent review by the Scrutiny CCTV Task Group, which consisted of three elected members of the Council and two 'lay persons'. As part of their review the Task Group held four themed discussion groups, which reflected the key areas of the review, which included public perceptions of CCTV and its effectiveness. Local residents groups were invited to attend along with officers and partners. As part of the discussion groups several members of the UK CCTV User Group also attended and added their expert knowledge.

Principle 4

Accountability for the scheme is clearly described in the separate CoP and OPM. The CCTV Strategy document explains that secondary monitoring of both systems is available to the Metropolitan Police Control Centres at Hendon, Bow, Lambeth and New Scotland Yard and similarly at the Integrated Borough Operations office at Wembley.

The Council has designated the Control Room Manager as having responsibility for the day-to-day running of these systems as well as the management and discipline of the Control Room.

The use or processing of images and information (Principles 5 – 12):

Principle 5

Clear policies and procedures are set out in the separate and previously referenced CoP and OPM. They also provide detailed guidance and instruction over the use of the CCTV systems and include an accurate summary of relevant legislation and the obligations of the Council.

The Council has employed seven members of staff to provide all of the CCTV Control Room function for the scheme, under the direct supervision of the Control Room Manager. All these employees were subject to security screening and police vetting when initially employed by the Council. All members of the team have been trained to the BTEC Level 2 Award in Public Space Surveillance and while two have been granted CCTV Public Space Surveillance licenses issued by the Security Industry Authority these were obtained on a personal basis as the Council is under no obligation to do so as currently no 'licensable activity', as defined by the Private Security Industry Act 2001, is being undertaken. The Council has identified the possibility of generating income if it were to monitor the CCTV systems of external customers and will give that initiative further consideration in due course (**see Opportunity for Improvement 03**).

Principle 6

The Council has set a minimum retention period of 31 days for all images recorded by both systems, with an automatic delete then over-writing the hard drive. Any images requested by the Police are then held in an electronic 'Evidence Locker' for a further 90 days pending their collection, otherwise they are also then deleted by the Control Room Manager.

The original recording of any images copied to the Police for Court proceedings are similarly retained for no more than two years in case of any requirement for their production, following which they are also then deleted. During the assessment the file contents of the 'Evidence Locker' were examined to confirm the robustness of this approach.

Principle 7

Access to retained images is strictly controlled by the Control Room Manager and in his absence the CCTV Control Room staff.

The disclosure of images to the Police utilises a Brent Council/Metropolitan Police form 656 (QK) and records the name and signature of the issuing and receiving officers. The images released to the Police are provided on a copy DVD, with the original recording retained by the Council as previously described. Each copy DVD released to Police is sequentially numbered and recorded in a Register maintained for that purpose in the Control Room. In the past twelve months a total of 1800 copy images have been released to the Metropolitan Police.

The management of authorisations for Directed Surveillance under the terms of the Regulation of Investigatory Powers Act (RIPA) is well documented and takes account of a recent Inspection by the Office of the Surveillance Commissioner. A total of 15 authorisations have been received by the Council in the past twelve months

Separate requests for images either as a result of Subject Access Requests (SAR) or other Third Party such as Insurers or Solicitors is processed through completion of a request form that is downloaded from the Council's CCTV webpage, where guidance is provided. Approximately 1800 such requests have been received by the Council in the previous twelve months, however, these are not currently recorded separately to similar requests received from the Police (**see Opportunity for Improvement 04**).

Principle 8

The Council is familiar with relevant British Standards relating to the Management and Operation of CCTV and has taken a decision meantime to pursue certification against Surveillance Camera Code of Practice in preference to BS7958:2015, primarily due to the additional costs that would be incurred.

The surveillance systems are installed and maintained in conformance with other relevant Standards through the ADT/Tyco contractor.

Principle 9

As previously described, the integrity of information and images relating to the CCTV scheme is fully documented in the separate CoP and OPM for the fixed and re-deployable systems used by the Council.

The CCTV Control Room is a secure environment within Brent Civic Centre, with access through electronic door locks. Spot monitors and wall monitors are appropriately sited within the Control Room Centre for viewing by Operators. The CCTV fixed camera system operates over a mix of private and BT fibre-optic networks. The majority of the system is analogue, however, plans exist to replace these with modern, digital, HD cameras through the re-commissioning of Brent's transmission circuit rentals. The re-deployable camera system operates with 4G mobile technology and encrypted transmission.

The assessment confirmed that the use and processing of images and information from both systems is fully consistent with the stated purpose of the scheme.

Principle 10

The Council previously developed a CCTV Strategy in 2007 and undertook a technical review of the system in 2013 which outlined the position of the system at the time, its aims and objectives, and, in particular, proposals for the system expansion.

In 2014 the Council commissioned an external study by IBI Group which comprised three key objectives; to critically review CCTV operations with an eye to efficiency and effectiveness; suggest methods of bolstering present service provision; and identify transformational changes to service delivery to sustain ongoing operations. The study undertook a Usage and Needs analysis to establish the relative importance of each fixed camera installation against a set of standard metrics, which included any pressing need and contribution to community safety, on the basis of crime pattern analysis over the previous three years. The recommendations of the study were structured around two major themes; stabilising and formalising the CCTV service (efficiencies); and developing a new business delivery model (transformations). These were subsequently incorporated into an Action Plan that remains in progress through the Control Room Manager.

In 2015 a Scrutiny CCTV Task Group published a further report in which over twenty recommendations were made for the future development of the Council's CCTV Strategy. Take together with the previous IBI Group study and recommendations, these various reviews led to the development of an updated CCTV Strategy in 2016.

Since April 2016 the Council has developed in-house the capability to record data on the use of CCTV through a GPS mapping system and as a result of which it will soon have analysis available on the effectiveness of both systems (**see Opportunities for Improvement 05 and 06**).

Principle 11

The CCTV scheme operated by the Council currently provides images and information that is of evidential value to the criminal justice system. All recordings utilise a Veracity NVR Digital Recording System at 12.5 frames p/second and images viewed during this assessment, including night time recordings under street lighting conditions, were of a good quality. All images downloaded to DVD include the exact date and time of the recording.

The times recorded on the CCTV systems are timed from a Veracity Timenet, Network Time Protocol (NTP) clock with a Global Positioning System (GPS) and therefore are accurate at the time of recording.

Principle 12

No ANPR or facial recognition systems form part of either system operated by the Council and no other reference databases are utilised in their management or operation of the scheme.

Issues from the previous assessment were reviewed with the following conclusion:

Non Conformance	0
Opportunities for improvement	4 (all adequately addressed)

Issues raised from current assessment

Non Conformance	0
Opportunities for improvement	6
Good Practice	0

Non-conformances identified

Ref	Clause	Issue	Agreed close out date
N/A			

Opportunities for Improvement

Ref	Clause	Issue
01	Principle 2	The Council is encouraged to complete the PIA for the CCTV surveillance systems within the next 12 months and then publish this on its website.
02	Principle 3	The Council should note the requirement over the publication on an annual basis of statistical information about the number and nature of any complaints received and consider including this on the CCTV webpage.
03	Principle 5	When considering future options for providing CCTV Monitoring Services to any external customers the Council should bear in mind its obligations by undertaking licensable activity, under Sections 3 and 5 of the Private Security Industry Act 2001.
04	Principle 7	The Council may wish to consider keeping a separate record of the number of requests for CCTV images received from the Police, Subject Access or other Third Party and analyse this each quarter.
05	Principle 3 & 10	The council should note the requirement to regularly review its CCTV systems and utilise the data now available on the GIS mapping system to analyse the effectiveness of the scheme, including camera locations and operator usage against recorded crime patterns. It may also wish to consider publishing a summary of previous and future reviews.
06	10	The Council may wish to consider publishing the outcome of this and future SCC Code of Practice assessment reports, specifically any Opportunities for Improvement and Good Practice.

Good Practice

Ref	Clause	Issue
N/A		

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