

Warwick District Council Community Protection

Deployable Camera Scheme Policy



Policy owner: Martin Riley
Date: October 2023
Review: Annually
Version: 4

Contents

Plan Amendment, Revision and Ownership	3
Plan Owner and Sponsor	3
Amendments	3
Review Process	3
1 Introduction	4
2 Background	4
3 Statement of Purpose	5
4 Protection of the Individual	6
5 Changes to the Protocol	6
6 Responsibilities of the Owners of the Scheme	6
7 Management of the System	7
8 Deployment	8
9 Accountability	9
10 Public Information	9
11 Residential Property in the Surveillance Area	10
12 Complaints	11
13 Breaches of the Protocol	11
14 Control and Operation of the Cameras	11
15 Review of Footage & producing evidence	12
16 Recording Media and Recorded Material	13
17 Photographs	14
18 Dealing with Incidents	14
19 Subject Access	15
Appendix A	17
Amendment Form and Record	20
ADVICE OF CHANGE FORM: Deployable Mobile Camera Policy	20
Amendment Record	21

Plan Amendment, Revision and Ownership

Plan Owner and Sponsor

This policy is owned and maintained by:

- Policy Owner, Martin Riley - Responsible for collation, policy management and updates.

The policy is fully endorsed and authorised by:

- Policy Sponsor, Marianne Rolfe - Responsible for policy promotion and endorsement

Amendments

The amendment procedure of this policy is as follows:

- All amendments must be submitted to the policy owner using the form on page 21.

Review Process

The policy will be reviewed:

- At least annually from the implementation date on the cover
- After any deployment that requires a review of the policy

1 Introduction

- 1.1 This protocol is to control the management, operation, use and confidentiality of the Warwick District Council Deployable Camera Scheme.
- 1.2 The protocol will be subject to periodic review following consultation with interested parties to ensure that it continues to reflect the public interest and that it and the scheme meets all legislative requirements.
- 1.3 The scheme will be under the control of the Warwick District Council. Deployments can be either through monthly tasking or presented directly to the WDC CCTV Operations Team Leader.
- 1.4 All interested parties will be updated on a regular basis of camera location, general use and ensure the scheme meets its objectives.
- 1.5 This system is for **overt** use in company with appropriate CCTV signage.

2 Background

- 2.1 This scheme is to provide deployable cameras across Warwick District. Funding for each deployment will be dependent on who has made the request and the purpose for the request.
- 2.2 Equipment Pool

The scheme utilises wireless rapid deployment cameras, utilising equipment capable of high-definition video (up to 1080p). As an all-in-one video surveillance Solution, it combines infrared PTZ camera, with inbuilt video analytics for intelligent surveillance. Live and recorded footage can be accessed via 4G and Wi-Fi allowing users to connect via a laptop. The date and time are stamped on the images. The SD card can be overwritten and will automatically clear after 31 days.
- 2.3 Overall responsibility for the scheme rests with Warwick District Council.

2.4 All recorded material and copyright thereof are owned by Warwick District Council, securely stored and are subject to an audit trail.

3 Statement of Purpose

3.1 To provide a safe and secure environment for the benefit of those who might live or work in or visit Warwick District. The system will not be used for covert purposes or to invade the privacy of any individual in residential, or other private premises, buildings, or land. Privacy blocks will be utilised where required. This will be Considered during the Privacy assessment, by the CCTV Operations Team Leader.

3.2 The scheme will only be used for the following purposes:

- Harm reduction - death, injury, loss, fear, and distress
- To prevent, and detect crime, anti-social behaviour and disorder.
- To reduce threat, harm, and risk
- To reduce the fear of crime and reassure the public.
- To identify, apprehend and prosecute offenders in relation to crime, anti-social behaviour, disorder, fly tipping, littering, nuisance, and any form of harassment.
- To provide Warwickshire Police, Warwick District Council, Warwickshire County Council, Fire and Rescue Services and Probation Service with evidence upon which to take criminal and civil actions in the Courts.

3.3 The scheme will be operated within the law and only for the purposes for which it is intended, or which are subsequently agreed in accordance with the Deployment Protocol. It recognises the privacy of the individual, and the need to ensure the security and integrity of operational procedures, in line with the relevant legislation and guidance such as the Surveillance Camera Commissioner 12 Guiding Principles, the CCTV Code of Practice, Human Rights, UK General Data Protection Regulation (UK GDPR) and Freedom of Information / Environmental Information Regulations (FOIA/EIR).

- 3.4 The camera system may be deployed at any location within the geographical area of the Warwick District.
- 3.5 The scheme will be developed to enable other Safer Communities partners to potentially request use of the cameras, which will be subject to reimbursement of associated deployment costs. The extension of the scheme will be subject to approval of the Head of Safer Communities, Leisure, and Environment (SCLE), where an expedited change is required.

4 Protection of the Individual

- 4.1 The system will be operated in accordance with the relevant legislation for the protection of civil liberties and in particular the Data Protection Act 2018/UK GDPR, the Human Rights Act 2004 (HR), the Freedom of Information Act 2000 / Environmental Information Regulations (FOIA/EIR), the Regulation of Investigatory Powers Act 2000 (RIPA), the Surveillance Cameras Commissioner and the 12 Guiding Principles and the scheme's Code of Practice.

5 Changes to the Protocol

- 5.1 A major change that would have a significant impact on the protocol or operation of the scheme will take place only after consultation with interested parties and subsequent approval by the Head of SCLE.
- 5.2 A minor change may be agreed by senior representatives with a participatory role in the operation of the scheme.

6 Responsibilities of the Owners of the Scheme

- 6.1 Warwick District Council will be responsible for the implementation of the protocol and will ensure compliance with operational guidance. Warwick District Council will also ensure compliance with requirements for accountability. The procedure where breaches of the Code occur is set out in paragraph 14 below.

- 6.2 When appropriate, Warwick District Council will consult with and provide information to the public about the operation of the scheme and about any proposed major changes to the scheme or protocol.
- 6.3 Warwick District Council will ensure that details of camera locations and deployments are shared with nominated representatives from the relevant Responsible Authorities such as:
- Warwickshire County Council
 - Warwickshire Fire and Rescue
 - Public Health, Warwickshire County Council
 - Warwickshire Police
 - Probation

7 Management of the System

- 7.1 The day-to-day management of the scheme and enforcement of the protocol requirements are the responsibility of Warwick District Council CCTV Operations Team Leader or their delegated representative at Warwick District Council.
- 7.2 All liaisons will be through the Warwick District Council CCTV Operations Team Leader or their delegated representative at Warwick District Council.
- 7.3 A CCTV security system prevents anti-social behavior and crime largely by increasing the risk of detection and prosecution of an offender. It is vital that any equipment used has the capacity to record evidence that will be acceptable for use at Court hearings. The following guidelines **must** be read and understood by all those involved in delivering the service. Where instructions are included, it is essential that they be strictly adhered to so that the evidence is not rendered inadmissible.

- Equipment

Each video recorder contains a built-in date/time generator. Each operator **must** test the accuracy at the start and end of each deployment.

- Recording Material

Recording material containing evidence required at Court become exhibits and the number of people handling them must be kept to a minimum.

Each person handling such recording material required for evidence at Court will be required to make a short statement and sign an exhibit label. Any such material will be stored securely by Warwickshire Police/Warwick District Council.

When any officer from Warwickshire Police/Warwick District Council is attending Court that person must be able to explain procedures in respect of the issuing, storage, and security of recording material.

8 Deployment

8.1 Requests from police will come from police tasking meetings, from intelligence and data analysis, and from Partnership Problem Solving meetings.

Each request will require partners to demonstrate what other interventions have already been investigated /actioned. If all other interventions/actions have been explored and proven unsuccessful, a Needs Assessment form will be required to be completed by the person requesting the deployment (Appendix A). This will be discussed by partners/colleagues as appropriate, based on supporting intelligence information. The final decision to agree or decline deployment will be made by the WDC Safer Communities and Civil Contingencies Manager, or their delegated representative, Warwick District Council CCTV Operations Team Leader and the reason for that decision will be given to partners.

8.2 A request from another WDC Service Area or from a councillor for deployment of a CCTV camera will be put forward to the Warwick District Council CCTV Operations Team Leader or their delegated representative at Warwick District Council. Each request will require a demonstration of what other interventions have already been investigated /actioned. If all other interventions / actions have been explored and proven unsuccessful a Needs Assessment form will be required to be completed by the relevant officer or councillor (Appendix A). This will be discussed by partners/colleagues as appropriate, based on supporting intelligence information. The final decision to agree or decline deployment will be made by the WDC Safer Communities and Civil Contingencies Manager or their delegated representative, CCTV Operations Team Leader and the reason for that decision will be given to the person making the request.

9 Accountability

- 9.1** The Protocol is a public document and will be made available to members of the public on request.
- 9.2** Police and any of the other responsible authorities will be informed and advised of the Protocol and be asked to operate within the spirit of this document.

10 Public Information

- 10.1** Signs clearly indicating that CCTV surveillance is in operation will be displayed at key positions on the perimeter of the camera location and at intervals within the operational area. The signs will allow people entering the area to make a reasonable approximation of the area covered by the camera. The signs will identify the owners of the scheme and include a contact telephone number as well as the purpose of the scheme to prevent or detect crime, anti-social behaviour, disorder, or other priorities. This will be conducted in accordance with current legislative requirements.

10.2 Any install will always be overt surveillance unless a RIPA Regulation of Investigatory Powers Act 2000 is authorised by the relevant Senior Responsible Officer or Police.

11 Residential Property in the Surveillance Area

11.1 The scheme will operate in a manner that is sensitive to the people living, working, and visiting in the area. Camera operators will receive training in the varying degrees of privacy afforded to public, semi-public, and private premises within a mixed commercial and residential area.

11.2 Some residents may express concerns about the use of the system in relation to private property. They will be initially responded to by email, letter, phone, or any other means of communication that explains the operation of the system and the safeguards that prevent its use in relation to private property. If the communication fails to satisfy the individual, the issue will be forwarded to the Warwick District Council Safer Communities and Civil Contingencies Manager for appropriate action.

11.3 It needs to be recognised that the siting or purpose of the camera may contravene Regulatory of Information Powers Act 2000 (RIPA). Therefore, at each location a Risk Assessment will be required to gauge the effects on individuals and check for intrusive/ non-intrusive surveillance and general/targeted surveillance. This will be conducted by the Warwick District Council CCTV Operations team leader Team Leader or their delegated representative at Warwick District Council.

11.4 A phone number is clearly sited on signage belonging to Warwick District Council for members of the public to contact.

11.5 Where cameras are deployed on property accommodating or owned by third parties their written permission will be obtained indicating that they have had the implications of the deployment explained to them including if evidence is later used against suspects.

12 Complaints

12.1 Complaints will be dealt with through the Warwick District Council Complaints Procedures.

13 Breaches of the Protocol

13.1 Breaches of the Protocol by Officers will be dealt with in accordance with the Warwick District Council's Grievance and Disciplinary Procedures.

13.2 Breaches of data or suspected breaches of data pursuant to the Data Protection Act 2018 will be handled by Warwick District Council's Incident Security Management Policy/Joint Data Breach Policy.

13.3 The agency using the system are responsible for the security of the system. Breaches of security will be investigated in the same way as Breaches of the Protocol.

13.4 When a serious breach of the Protocol or security occurs, Warwick District Council may appoint an independent person to investigate and make recommendations.

14 Control and Operation of the Cameras

14.1 Only properly and adequately trained CCTV staff will have access to the cameras.

14.2 The use of the cameras will be solely in accordance with the purpose and objectives of the scheme and will not be used for any purpose whereby the privacy of an individual would be compromised, other than when appropriate authority has been obtained.

14.3 CCTV operators will be subject to supervisory procedures by the nominated Officer in Warwick District Council (CCTV Operations Team Leader to ensure compliance with this aspect of the Protocol.

14.4 The monitoring of the cameras needs to be conducted on the equipment provided as part of the scheme. Original discs may only be removed from the Warwick District CCTV Control Room in a sealed evidence bag in custody of an authorised person, with a signed receipt being retained.

14.5 Demonstrations of the system for lawful, proper, and sufficient reason will only be carried out with the approval of the day-to-day managers of the system.

15 Review of Footage & producing evidence

15.1 Viewing requests by police will be made to the CCTV Operator on duty at the time of request, via the standard protocol. The viewings will be conducted by the CCTV Operator on duty for a reasonable review period. Any viewings of a significant time frame may be conducted by the police under the supervision of the CCTV Operator on duty.

15.2 Viewing requests by Councillors / colleagues / partners / external agencies will be made directly to the CCTV Operations Team Leader. The viewings will be conducted by the CCTV Operations Team Leader or designated operator and subject to the time frame required to be reviewed.

15.3 It is not possible for members of public to review images unless an application is submitted under the Data Protection Act 2018, Freedom of Information Act 2000 or Environmental Information Regulation (FOIA/EIR). The CCTV Operations Team leader receiving an application will consider the rights of access pursuant to DPA/FOIA/EIR and relevant data protection legislation. More information on the Warwick District Council privacy notice can be found here. - [Your information rights - Warwick District Council privacy notice - Warwick District Council \(warwickdc.gov.uk\)](#)

15.4 Footage required to be burnt to disc will be done by the CCTV Operations Team Leader or designated operator and will require the standard

evidence trail which includes a unique reference number with relevant release paperwork, details of person requesting the footage and for what reason.

16 Recording Media and Recorded Material

- 16.1** Recorded material will only be used for the purposes defined in the Protocol and access to recorded material restricted as defined. No recorded material will be made available for sale or entertainment purposes.
- 16.2** Recording equipment will be checked and tested when an officer starts a period of deployment.
- 16.3** All recording material will be kept in a lockable cabinet when not in use.
- 16.4** Each item of recording material will be clearly marked with a unique exhibit reference number in indelible ink.
- 16.5** A record will be kept for each deployable camera by the CCTV Operations Team Leader. The record will indicate the date and time each camera is downloaded, the officer carrying out the download and the outcome of the deployment.
- 16.6** Access to recordings may be obtained in connection with civil disputes by Court Order or extended to lawyers acting for defendants or victims in connection with criminal proceedings in conjunction with the Police. No other access will be allowed unless approved by the CCTV Operations Team Leader or their delegated representative at Warwick District Council for the reasons which fall within the purpose and objectives of the scheme.
- 16.7** Data will be retained in accordance with the industry standard of 31 days.

17 Photographs

- 17.1** Still photographs are not taken without justification and will remain the property of Warwick District Council. A record will be kept of the reason to produce a photograph, date, time, and details of the operator responsible for taking the photograph.

- 17.2** All still photographs will be destroyed when no longer required unless retained as evidence or for training purposes by the CCTV Operations Team Leader.

- 17.3** All the rules and procedures for the handling and storage of recording material shall apply to photographs.

18 Dealing with Incidents

- 18.1** Incidents or suspicious circumstances that fall within the purposes of the system shall be referred to the Police in accordance with agreed procedures. Any subsequent action will follow further instruction.

- 18.2** For any recording material to be used as evidence in criminal proceedings there must be evidence of continuity of handling of the recording material from the time it was first brought into use to its production in Court as evidence. Section 15 above covers logging procedures. The recording material will be always kept secure thereafter and will be recorded and dealt with in accordance with safeguarding Police procedures.

- 18.3** The recording material exhibited in Court as evidence must be the original recording. There must be no editing, either by cutting or splicing or recording from other sources. However, while the original recording material is in police possession, Warwickshire Police may take one working copy of the recording and a second copy to be used as disclosure material to the defence. Written statements will be required as supporting evidence on copying and other handling of the recording material.

19 Subject Access

- 19.1** Access to and disclosure of images and other data to third parties shall be in accordance with the requirements of the Data Protection Act.
- 19.2** Requests must be in writing and accompanied by sufficient information to enable the individual to be identified on the recording. Sufficient information must be supplied to enable the relevant recording to be located including a specific date and reasonable time window.
- 19.3** The Warwick District Council CCTV Operations Team Leader or their delegated representative at Warwick District Council will respond within 31 calendar days.
- 19.4** All employees associated with the CCTV System shall be made aware of the restrictions set out in this Protocol relating to access to, and disclosure of, recorded data to third parties.
- 19.5** Disclosure of recorded data to third parties shall only be made for the following purposes:
- To Law Enforcement Agencies where recorded data would assist in a specific criminal enquiry.
 - To Prosecution Agencies
 - To relevant legal representatives
 - To persons whose data has been recorded and retained - unless disclosure to the individual would prejudice criminal enquiry or criminal proceedings.
- 19.6** All requests for access or disclosure shall be recorded and channelled to the Warwick District Council CCTV Operations Team Leader or their delegated representative at Warwick District Council. If access or disclosure is denied, the reason shall be documented.

19.7 Where images of individuals are disclosed, the Controller shall decide whether images of third parties are held under a duty of confidence.

19.8 Where third party images are not to be disclosed, the images of individuals shall be blurred or disguised so that they are not readily identifiable.

Appendix A

Contact Information	
Name of person making request	
Councillor\MP\Business Group\Residents\Council Directorate\Housing Association\Police etc	
Reason for request	
Where is the suggested location?	
Is the installation of mobile CCTV necessary to address a pressing need, such as public safety, crime prevention, ASB or national security etc?	
Give details of what attempts have been taken to resolve the issue/s prior to making this request for CCTV	
Can CCTV realistically deliver these benefits? Can other less intrusive solutions be used?	
Is it proportionate to the problem it is designed to deal with?	
Camera Requirements	
What do you want the mobile camera/s to address / capture?	
Does the location have any WCC lighting nearby?	Yes\No
If yes has WCC confirmed, we can use their lighting column	Yes\No

and what is the lighting column number?	
Person Contacted at WCC	
Existing CCTV	
How far away is the closest WDC CCTV camera?	
What is the camera number(s)? Info can be found on WDC website	
Can the nearest camera see the proposed location?	Yes\No
Considerations	
Is this part of a major development?	Yes\No
If yes what?	
Is the location being considered for enforcement purposes?	Yes\No
If Yes please state	
Evidence to support installation	
Number of reported crimes to Police (last 12 months)	
Types of incidents reported	
Number of incidents reported to council (last 12 months)	
Types of incidents reported	
Funding & costs	Costs are detailed on next page

Who will be funding the project?	
Have the costs been agreed with whoever is funding the project?	
Conclusion reached by Warwick District Council CCTV Single Point of Contact (SPOC):	

Amendment Form and Record

ADVICE OF CHANGE FORM: Deployable Mobile Camera Policy

1. IF YOU HAVE NO AMENDMENTS TO MAKE, PLEASE TICK THE FOLLOWING BOX AND RETURN THE FORM TO THE POLICY OWNER.

NIL RETURN

2. IF YOU HAVE AMENDMENTS TO MAKE, PLEASE PROVIDE DETAILS BELOW
(Add extra sheets if necessary):

SECTION:	PAGE NUMBER	AMENDMENT:

Signature of policy holder:

Date:

Please return Advice of Change (either electronically or in hard copy) to:

Martin Riley
CCTV Operations Team Leader
Safer Communities, Leisure, and Environment
Warwick District Council
Riverside House
Milverton Hill
Royal Leamington Spa
CV32 5HZ
Direct Line: (01926) 456908
Email: Martin.Riley@warwickdc.gov.uk

Amendment Record

Amendment No	Date	Amended by (Print Name)	Remarks
1	08/09/23	Martin Riley	All mention of Emergencies team leader & supervisor removed from the document and replaced with CCTV operations Team Leader
2	08/09/23	Martin Riley	Owner of Policy, date and version updated
3	08/09.23	Martin Riley	Information added to 3.1 to reference Privacy block usage
4	08/09/23	Martin Riley	Service area reference updated to Safer Communities, Leisure & environment on all footers
5	08/09/23	Martin Riley	Contact details and phone number updated
6	08/09/23	Martin Riley	The term 'Designated Operator' added to relevant sections to reference that operators maybe asked to perform some tasks as requested by the Operations Team Leader.
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

