

# **A Code of Practice (CoP) for South Oxfordshire and Vale of White Horse District Councils' Public Space CCTV Scheme**

## **INTRODUCTION**

This code of practice is intended to set out standards and procedures for the management, operation and use of the town centre closed-circuit television (CCTV) schemes under the control of South Oxfordshire and Vale of White Horse District Councils.

This code of practice reflects the councils' consideration of the 'Surveillance Code of Practice' published by the Home Office in January 2022 and 'In the picture: A data protection code of practice' produced by the Information Commissioner's Office (ICO) in 2018.

This code is also supported by an operational handbook which is adhered to by all authorised personnel operating the CCTV system. A copy of the handbook is held in the control room.

The councils' scheme operates across six market towns in South Oxfordshire and the Vale of White Horse. There are 86 cameras in total, monitored from a control room within Abingdon Police Station, by staff employed by the district councils.

Whilst this code of practice has been produced in relation to the town centre public space CCTV schemes, it is important to note that there are some additional surveillance cameras used by the district councils to help support community safety and protect the environment (the list below is not exhaustive and individual council services may manage their own cameras for other purposes - e.g. property security):

- The Community Safety team manages the installation of temporary covert guard cameras on behalf of the South and Vale Community

Safety Partnership (CSP). The aim of this service is to help victims of crime and vulnerable people feel safe in their own homes. Guard cameras are installed in accordance with data protection, only cover private property and are reviewed periodically to ensure they are still required.

- The Environmental Protection team manages the installation of temporary covert cameras to detect and prevent the crime of fly tipping across the two districts. Signage is placed at these fly tipping hotspot locations informing the public that covert surveillance is potentially taking place. This means the process is excluded from the requirements of the Regulation of Investigatory Powers Act 2000 (RIPA) as the surveillance is overt. These camera locations are periodically reviewed to ensure they are still required.

The Waste team has the option to use Body Worn CCTV to help officers when dealing with environmental enforcement action. It can be used to instantly record incidents, act as a visible deterrent to verbal and physical abuse towards officers, provide evidence to support internal or other investigations and strengthen accountability and transparency.

## **PRINCIPLE ONE**

***‘Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.’***

### **1.1 Aims of our CCTV scheme**

- a) to contribute to the reduction of crime and fear of crime
- b) to provide a safer environment for the community across all areas covered by the scheme
- c) to manage demand on services through working together
- d) to protect vulnerable people
- e) to target and manage harm and risk

### **1.2 Purposes**

- a) to help prevent, detect and reduce crime, disorder and anti-social behaviour
- b) to help reduce the fear of crime by providing reassurance for all those who work, trade and visit South Oxfordshire and the Vale of White Horse

- c) to help safeguard vulnerable people
- d) to provide evidence to assist in criminal and civil cases
- e) to assist statutory agencies (e.g. police) to deploy their resources effectively
- f) to assist in the management of the public areas covered by the scheme and support the local authority's enforcement and regulatory functions
- g) to assist in civil emergencies and countering terrorism

Our cameras are permanently sited and have pre-set positions when not being controlled by authorised personnel. The need for and use of cameras and their pre-set positions are reviewed annually in association with Thames Valley Police (TVP) and other relevant stakeholders.

**1.3** The district councils are only able to accept requests to add new CCTV cameras to their town centre schemes from the relevant town council(s) and/or the police. This should be done as part of our annual review of our CCTV camera pre-set positions which is carried out in consultation with our police and town council partners.

Due to the significant public cost of adding new cameras to our CCTV schemes (both in terms of the initial capital costs and also the on-going running costs) and to ensure compliance with our CoP, any new camera would need to focus on public, non-residential town centre space where there is a high footfall and evidence of a significant pressing need, in accordance with the national Surveillance Camera Code of Practice. We would also need to be able to satisfy the test that a new CCTV camera would be the most appropriate and effective solution to the identified need.

If the police or a town council would like to submit a request to add an additional CCTV camera to one of our town centre schemes outside of the annual review process, they will need to do so in writing to [communitysafety@southandvale.gov.uk](mailto:communitysafety@southandvale.gov.uk).

## PRINCIPLE TWO

***'The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.'***

**2.1** The system continuously records all camera inputs at a minimum rate of 12.5 images per second. The images are retained for a nominal period of 31 days. The digital video recorders (DVR) automatically overwrite the existing

image data with new data which maintains a rolling first in first out retention process.

**2.2** When cameras are commissioned, a data protection impact assessment is completed. Where necessary, privacy measures are employed e.g. to avoid the view into a residential property.

**2.3** Should any request for directed surveillance authority (DSA) be made or it is believed that the circumstances may require DSA authorisation, the necessary authority must be authenticated, and the supervisor notified as soon as possible.

## PRINCIPLE THREE

***‘There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.’***

**3.1** Where cameras have been commissioned, signage is displayed to indicate the data controller of the system and appropriate contact details. Further information about our CCTV schemes is available on both district councils’ websites:

<https://www.whitehorsedc.gov.uk/vale-of-white-horse-district-council/community-help-and-safety/cctv/>

and

<https://www.southoxon.gov.uk/south-oxfordshire-district-council/community-help-and-safety/cctv/>

**3.2** We produce biannual CCTV performance reports which are created from statistical evidence recorded by operators when using the cameras to monitor incidents. Each event is recorded as a ‘record of occurrence’ and captures information for a particular event e.g. camera used, type of incident, place, time etc.

**3.3** A copy of this code of practice and the latest reports can be downloaded directly from the district councils’ websites. The websites also include the relevant contact details for the CCTV control room.

## PRINCIPLE FOUR

***‘There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.’***

**4.1** The system is managed and controlled as shown below:

Role	Responsible
Owner	South Oxfordshire and Vale of White Horse District Councils
Manager	South Oxfordshire and Vale of White Horse District Councils or nominated representative on behalf of owners

Operators have a clear guide to work to in the form of our operational handbook.

N.B. We use a contractor to deal with day to day maintenance and repair of equipment.

**4.2** When newly appointed, operators attend a course to earn the Security Industry Authority (SIA) CCTV operators' qualification. To work alone they must acquire the SIA licence and undergo a comprehensive induction period, where they work alongside other operators and become familiar with basic procedures, our code of practice and operational handbook. Operators also undertake various training events as required by their employer.

**4.3** A record of events is kept by the operator on duty. Each event involving camera usage is recorded as a separate 'record of occurrence' log. Details of all visual material that is requested for evidential purposes is recorded on a central data base before it leaves the control room. Master copies of the material are held securely and then confidentially destroyed after six years.

## PRINCIPLE FIVE

***'Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.'***

**5.1** Rules, policies and codes of practice are laid out in this document and the accompanying operational handbook. All operators are expected to have sound knowledge of their content before lone working.

**5.2** There is a declaration of expected behaviours for all visitors to the control room, situated at the entrance. Visitors must sign a register to show agreement to these conditions before entering the control room itself. There are also individual notices displayed around the control room as reminders of these conditions e.g. not to record footage on handheld mobile devices.

## PRINCIPLE SIX

***‘No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.’***

**6.1** Images are stored on our servers for a nominal period of 31 days. Master copy of images on a secure external drive and associated paper documents are kept for six years and then securely destroyed via a confidential waste disposal collection.

**6.2** When cameras are not being controlled by an operator, they are in a resting or pre-set position. This view is aimed to capture activity in possible ‘hot-spots’ and has been agreed with TVP. Each camera view is reviewed on a yearly basis. N.B. Some cameras have more than one pre-set position as they may be moved to support nighttime economy.

## PRINCIPLE SEVEN

***‘Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.’***

**7.1** Even though the CCTV control room is situated within the police station, because it is run by the local councils, access to the control room is restricted via a coded keypad entry system.

**7.2** Unauthorised personnel must sign a visitors’ book, thus agreeing to the conditions of entry and attendance displayed at the entrance. Entry is strictly at the discretion of the supervisor and/or operator on duty. All visitors are always supervised.

**7.3** Viewing of recorded material is logged using the ‘viewing log’ and acknowledged and signed by the individual carrying out the viewing. All viewing is overseen by an operator.

**7.4** Release of data is only via a designated path backed up by designated request forms, through the DEMS (digital evidence management system)

**7.5** Members of the public and other organisations such as insurance companies and solicitors can request footage either in writing or verbally. If an individual is requesting footage of themselves, this would be managed as a subject access request. Requests from third parties can be considered under an exemption from the Data protection act 2018. Release of such footage will

be judged on a case-by-case basis, and will be handled in accordance with the councils' corporate approach to subject access and exemption requests.

## PRINCIPLE EIGHT

***'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.'***

**8.1** Operators receive in house induction and on-going training to enable optimal use of the system. As outlined under Principle Four, all operators must have an SIA licence and are vetted through TVP.

## PRINCIPLE NINE

***'Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.'***

**9.1** As outlined under Principle Seven, we have clear procedures for accessing and using CCTV data. Any images captured are only accessible to authorised personnel and shared with those who have a legitimate interest e.g. police, other council departments.

## PRINCIPLE TEN

***'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.'***

**10.1** A yearly review of pre-set camera positions is undertaken in consultation with TVP and other relevant stakeholders. Periodically, we carry out an in-depth review of camera usage to determine an ongoing need for cameras in any given location. Data acquired from camera monitoring is published in a biannual report on the district councils' websites.

## PRINCIPLE ELEVEN

***'When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.'***

**11.1** Where requested, footage or stills are released to police officers with a witness statement. Operators would also make themselves available for a court appearance if requested.

**11.2** Our operators can export images and information from our CCTV system when requested and can export images and without interrupting the operation of the system. We provide the exported images and information in a format which can be readily accessed and replayed.

**11.3** Requests from council colleagues, other organisations e.g. solicitors or insurance companies or members of the public are also considered. However, there must be an identifiable purpose and benefit indicated in any request made. Any release of material to another party is at the discretion of the data manager or their designated representative.

**11.4** Servers' times are checked once per operator shift to ensure accurate timings.

## **PRINCIPLE TWELVE**

***'Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.'***

**12.1** Only data relevant to a specific request is released. Each request is given its own unique reference number and details are recorded electronically in a central database. All information, hard copy or electronic, is retained for six years after which time it is permanently deleted or securely destroyed.

**12.2** Master copies of all footage and stills are kept for six years and again, securely destroyed.

## **DATA PROTECTION ACT**

The scheme is registered with the Information Commissioner, under registration numbers Z6629204 for South Oxfordshire District Council and 6666984 for Vale of The White Horse District Council. The scheme will be managed in accordance with The Data Protection Act 2018 and the Articles of the UK General Data Protection Regulation (UKGDPR). The Act encompasses seven data protection principles, as summarised below:

1. The processing of personal data must be lawful, fair and transparent.
2. Personal data must not be processed in a manner that is incompatible with the purpose for which it is collected.
3. Personal data must be adequate, relevant and not excessive in relation to the purpose for which it is processed.
4. Personal must be accurate and where necessary, kept up to date.



5. Personal data must be kept no longer than is necessary for the purpose for which it is processed.
6. Personal data must be processed in a manner that ensures appropriate security of personal data, using appropriate technical or organisational measures.
7. We take responsibility for the personal data we manage and have measures in place to demonstrate our compliance.

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