

OFFICIAL



Rushcliffe Borough Council

Policy and Procedure for

Public Spaces

Surveillance Systems

March 2023

The completion of this log is to satisfy the need for audit and continuity of image management as required by the Data Protection Act 2018 & any subsequent judicial proceedings

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Rushcliffe Borough Council Public Spaces Camera Surveillance Systems

1.0 Introduction

This public spaces surveillance system is operated by Rushcliffe Borough Council.

This document sets out the policy and guidelines of Rushcliffe Borough Council, hereafter referred to as 'the Council', on issues involved in the planning for, management, operations of and actual deployment of the Council's camera surveillance systems. This document includes and delivers overarching policy principles and procedures in addition to referring to separate policy for the use of body worn video surveillance cameras and surveillance cameras affixed to Council vehicles. These guidelines have been agreed and authorised by the senior responsible officer in relation to surveillance (SRO), head of legal service, the data protection officer and the Council's single point of contact (SPOC) in relation to surveillance cameras.

2.0 Definitions and guiding legislation adopted for this policy

'the Council'	Rushcliffe Borough Council
ACC	Assistant Chief Constable.
Surveillance Camera Operator	The person who is responsible for monitoring, controlling and recording video evidence produced by video surveillance systems.
Surveillance Camera Partner	Direct or indirect partners who assist in public protection throughout the borough.
Surveillance Camera Systems	Any overt surveillance system, surveillance items comprising of cameras and associated equipment for monitoring, image transmission and receiving purposes, for use in a defined security zone to which the public have unrestricted access, includes body worn video camera, Council vehicle surveillance cameras and re-deployable/mobile cameras
Control Room	Secure area within a building, or a secure building where a surveillance system is installed and monitored and where data is captured, retrieved, stored and analysed.
Data	All recorded images, including personal data the Council hold relating to individuals Note: In the context of camera surveillance systems this includes images and any other associated information linked or processed.

Data Controller	The person identified within each scheme who determines the purpose and the manner in which any stored data is to be processed or disclosed.
Data Processor	A person who processes stored data on behalf of the Data Controller
DPA/GDPR	Data Protection Act 2018 & GDPR 2016
ICO	Information Commissioners Office
POFA	Protection of Freedoms Act 2012 Section 29
Personal Data	Data which relates to a living individual who can be identified either from that data or data and other information, which is in the possession of the Data Controller, or is likely to come into such possession
RIPA	Regulation of Investigatory Powers Act 2000
SCC Code of Practice	Surveillance Camera Commissioner's Code of practice and 12 guiding principles
SPOC	Single Point of Contact for camera surveillance purposes
SRO	The Senior Responsible Officer for compliance with Protection of Freedoms Act 2012 requirements in relation to the SCC Code of Practice
Stakeholder	Any person affected directly or indirectly by the existence or activities of any organisation. This can be in the capacity of an employee, supplier or any person living or visiting within the area.

3.0 General Principles

- 3.1 The purpose of the Council's public space Surveillance Camera Systems within the borough of Rushcliffe is to maintain public and community safety and help reduce the fear and risk of crime in areas of vulnerability. The monitoring of these areas covered by the Surveillance Camera systems is considered to be proportionate and necessary for the locations in which cameras are situated. This policy document is intended as a reference document which outlines the purpose, objectives and main principles of the Surveillance Camera systems used by the Council. The Surveillance Camera systems will always be operated in order to achieve planned results in such a way as to retain the confidence of all investors, stakeholders, residents and the general public within the area of operation. This policy is based upon recommended 'best practice' and the means of compliance in accordance with the PoFA 2012, ICO Surveillance camera guidance, RIPA 2000, DPA 2018, GDPR 2016 and the SCC's code of practice and 12 guiding principles.

Arguably, camera surveillance is one of the most powerful tools to be developed in recent years to assist with the prevention and detection of crime and enhancing community safety. Surveillance systems are now a common sight in most cities, town centres, parks, recreations grounds, car parks public buildings and within retail areas. This system will be used for the provision of video recordings for evidential purposes to the police and other bodies having prosecuting powers and, in some cases, insurance companies dealing with road traffic accidents.

Common misconceptions and concerns expressed as to the intrusive nature of camera surveillance can only be addressed if Surveillance Camera Systems are accountable to the very people they aim to protect. The confidence and trust of the communities the system is designed to protect is fundamental to the success of any Surveillance Camera System. Every member of the community is effectively a 'stakeholder' in the system and has a right to be kept informed of the scheme objectives and be apprised of its successes and its failures. In the absence of any statutory regulation, other than the licensing by the SIA of individuals employed within the security industry, and compliance with the specific requirements of the Data Protection Act, the adherence to existing Codes of Practice and legislative guidance will ensure surveillance not only remains effective but also operates with the confidence and supports the communities it aims to protect.

The Council's main Surveillance Camera Systems do not carry out audio recordings, nor does the main system support facial recognition software or automatic number plate recognition software. The Council's body worn surveillance system does record audio. The surveillance systems, and procedures used in its operation, are compliant with the Surveillance Camera Commissioner's (SCC) code of practice for the operation of Surveillance Camera Systems and are compliant with the 12 guiding principles set out in the code giving due consideration to the Protection of Freedoms Act 2012.

The full extent of the Council's Surveillance System is subject to an annual review to ensure compliance with the scheme objectives and the European Convention on Human Rights, including an assessment of a continued pressing need. The Council's Surveillance Camera Systems main purpose is to assist in the prevention, investigation and detection of crime, the apprehension and prosecution of offenders, the maintenance of public order, anti-social behaviour and the reduction of vandalism.

The body worn video Surveillance Camera System may also be used to support the statutory obligations and duties of the Council and may serve to resolve complaints against enforcement officers or others where no other alternative is available.

- 3.2 Rushcliffe Borough Council support individual's right to privacy and would expect that this is a significant consideration of all department and agencies involved in a Public Space Surveillance Camera Systems. The community at large should be satisfied that there is responsible accountability, management and supervision of Surveillance Camera systems in public places. The Council's policy and Code of Practice will ensure that the Surveillance Camera Systems are operated fairly with legitimate aims, meets a pressing need, is proportional to the level of intrusion exerted and therefore act responsibly within the law. The operation of the scheme is fully compliant with the requirements of the Data Protection Act 2018, (GDPR 2016) and the Human Rights Act 1998 and all other relevant legislation. The Surveillance Camera Systems will take into account its effect on individuals and their privacy ensuring compliance with the surveillance commissioner's code of practice and 12 guiding principles is maintained. The Council carry out cameras surveillance by assumed consent in accordance with GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest. Local authorities establish their Surveillance Camera Systems under the GDPR/DPA 2018 and Section 17 Crime and Disorder Act 1998 which places an obligation on local authorities and the police to work in partnership to develop and implement a strategy for tackling crime and disorder. In addition, Section 163 of the Criminal Justice and Public Order Act 1994 creates the power for local authorities to provide surveillance camera coverage of any land within their area for the purposes of crime prevention or victim welfare.
- 3.3 Rushcliffe Borough Council fully support the use of Public Surveillance Camera Systems, but the support is conditional upon there being appropriate local consultation involving neighbouring local authorities, Police, the local community and general public during the planning phase with support and measured operational requirements of any new scheme or any alteration to existing Council owned schemes.
- 3.4 Rushcliffe Borough Council set performance criteria for the quality of the recorded images produced by surveillance systems in accordance with the surveillance BS standards, industry standards and would insist that these standards are maintained. All images recorded will be of suitable quality required by the judicial system and are of evidential quality to support the crime prosecution services (CPS).
- 3.5 No sound recording facility would be provided with any Public Surveillance Camera Systems; however, when using a body worn video camera recording devices sound recording will be carried out in accordance with the Councils body worn camera usage policy-procedure (a separate policy).
- 3.6 The Councils Data Protection Officer, legal services, senior managers (SRO) and Surveillance Camera Manager (SPOC) has responsibility for all aspects of the scheme that relate to the collection, processing and recording of personal video image data, as defined in schedule 1(1) of the Data Protection Act 2018. The senior responsible officer (SRO) and surveillance manager (SPOC) is responsible for the operational aspects of the Council public space surveillance systems; therefore,

requests for service should be directed to Rushcliffe Borough Council, Council Offices, Rushcliffe Arena Rugby Rd, West Bridgford, Nottingham NG2 7HY

4.0 Application for the introduction of additional surveillance Systems

4.1 After completion of the relevant SCC passport to control surveillance documentation and operational requirements. All applications are to be submitted on a general Rushcliffe Borough Council Data Privacy Impact Assessment (DPIA) application form (shown at Annex 'A'). A form can be provided on request from the surveillance camera manager or obtained from the Council's website/intranet. All completed applications should be returned to the surveillance camera manager. From time to time re-deployable or mobile cameras may be temporarily sited within the borough of Rushcliffe. The use of such cameras, and the data produced by virtue of their use, will always accord with the objectives of the Council's Surveillance Camera Systems and be governed by this SCC Code of Practice and the operational procedures for the Surveillance Camera Control Room. Where essential reactive rapid deployment/re-deployment of surveillance cameras are required the same operational procedures will be applied, in these circumstances associated documentation and supporting evidence may be completed retrospectively rather than in advance of deployment or installation.

5.0 Decision on deployment.

5.1 The SRO and SPOC will make the final decision on any additional Surveillance Camera System deployment or installation, and only after satisfactory completion of a Data Privacy Impact Assessment (DPIA) forms and on successful acceptance and approval of appropriate consultation. The surveillance manager will be responsible for assessing and prioritising applications for any additional Surveillance Camera Systems or redeployment of existing systems. The surveillance manager will use the following points as guidelines in reaching their decision and must always give consideration to the following to demonstrate justification in relation to proportionality.

- What is the Council's purpose for using the Surveillance Camera System and what are the issues that the system aims to address?
- Can surveillance camera technology realistically deliver these benefits?
- What are the views of those who will be under surveillance (consultation feedback)?
- Have other less privacy-intrusive solutions such as improved lighting been considered
- What are the benefits to be gained from using surveillance cameras?
- What are the privacy issues arising from this surveillance camera system?
- Has any privacy by design features been adopted to reduce privacy intrusion?
- Could any features be introduced as enhancements
- What organisations will be using the surveillance images and where is data controller responsibility under the Data Protection Act 2018
- Will the surveillance camera equipment being installed and the system of work being adopted be sustainable?
- Is there sufficient funding for the scheme?
- What future demands may arise for wider use of images and how will these be addressed
- Will the particular system/equipment being considered deliver the desired benefit now and in the future?

- Is the system established on a proper legal basis and is it operated in accordance with the law?
- Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?
- Is it justified in the circumstances?
- Is it proportionate to the problem that it is designed to deal with
- Do any of these measures discriminate against any particular sections of the community

6.0 Camera Positioning

- 6.1 Maximum deterrent value will be achieved by having cameras clearly visible and the areas of coverage will be indicated by the use of clearly mounted signage in close proximity to the cameras. Signs will also be deployed on the main access routes into each area covered by Surveillance Camera scheme/systems and also at strategic locations within the designated area.
- 6.2 The cameras will be sited as a consequence of agreement after consultation between Rushcliffe Borough Council and other public interest groups and only after full consideration has been given to completion of a Data Privacy Impact Assessment (DPIA). A crime pattern analysis should be utilised to assist in the determination of the location of a camera or group of cameras. Cameras will be prominently situated in fixed positions, in areas to which the public have unrestricted access and within public view. No camera is to be hidden or obscured and, as far as possible, all cameras should be out of risk of criminal damage.
- 6.3 Individuals or groups may appeal/object against the positioning of a specific surveillance camera. This must be done by writing to the head of legal service, at the address given in section 3.6. Appeals or objections are best made during the consultation stage before the exact camera location decision is determined.

7.0 Monitoring

- 7.1 Rushcliffe Borough Council will monitor the public space Surveillance Camera Systems in accordance with its operational requirements, not all Surveillance Camera Systems are monitored live 24/7 and therefore will respond, where possible, to information provided which requires police action. The response element to incidents will at all times be the responsibility of the local police commander, inspector or in relation to third party disclosure requests.
- 7.2 Rushcliffe Borough Council clearly cannot guarantee that all offences will be detected even when surveillance images of an incident are available. Equally the Council cannot guarantee that where an offence has occurred that surveillance images of that offence will be available. Consequently, Rushcliffe Borough Council is unable to accept liability for any loss, damage, or injury that occurs within the areas that are monitored.
- 7.3 Rushcliffe Borough Council public space Surveillance Camera Systems will not be used to obtain recorded evidence to prosecute minor offences unless accompanied by a more serious offence or unless it is of a nature which causes public danger or nuisance (this does not preclude the use of the surveillance system in connection with the Council's core business and statutory duties).

- 7.4 The use of the public space Surveillance Camera Systems to obtain recorded evidence in relation to other non-serious offences will be guided by the Local Policing Plan, Police Priorities, guidance from the Crown Prosecution Service and other public interest considerations.
- 7.5 This policy is supplemented by separate surveillance control room Procedures Manual which is stored securely within the surveillance control room, and also accessible electronically, for use by Operators. Where monitoring is directly controlled by Rushcliffe Borough Council it is accepted that the surveillance control for such operations will only use fully trained surveillance camera operators to observe camera images or recordings retrospectively.
- a. Except where used for training or demonstration there shall be no public view of the monitors. Images of areas in which individuals would have an expectation of privacy will not be made available for these purposes nor will they be viewed by non-authorized persons. Reference should also be made to section 8 which defines the image disclosure policy in more detail.
 - b. Except for wide angle or long distance shots, views into residential premises, office accommodation and other 'private' areas will be excluded from the field of vision or redacted (privacy zones). Surveillance Operators are trained to recognise the privacy implications of viewing/reviewing such areas and would only do so when a serious crime is being committed or they have reason to believe a serious crime is being committed.
- 7.6 Individuals who have concerns over any potential intrusion of their privacy may request a review of camera operations by writing to the head of legal service, in writing at the address given in section 3.6.

8.0 Recorded Material and Disclosure

- 8.1 Recorded digital material will be retained for 30 days then the material will automatically be deleted, except when directly linked to an on-going criminal investigation or on-going prosecution, where it will be retained until the judicial process in pursuant of prosecution has been satisfied.
- a. Except when using a body worn camera, this digital material because of the nature and level of intuition will only be retained for 14 days unless directly linked to an assault or on-going prosecution, where it will be retained until the judicial process in pursuant of prosecution has been satisfied.
- 8.2 All captions inserted on to camera images, such as camera location, time and date will be kept accurate by the appointed surveillance camera maintenance contractor, who is responsible to the surveillance camera manager. The source of the time information will be regularly checked to ensure compliance with GMT time and date.
- 8.3 Under normal circumstances, there will be no public access to recorded material. Any access that is granted by the Data Protection Officer / surveillance camera manager (SPOC) will be strictly controlled and supervised in accordance with Data Protection principles.

- 8.4 Members of the general public may apply to view a recording made of them (subject access request) by writing to the Council's Data Protection Officer at the address given in Section 3.6. Details will be provided outlining the information that applicants will need to provide, which will enable the images of them to be located and identified. An information sheet describing the types of images that are recorded, their purpose and the disclosure policy will also be provided. The information is also accessible on the Council's website.
- 8.5 In relation third party disclosure requests (insurance companies) a reasonable fee will be charged to cover costs for searching and copying to secure portable storage devices and securely delivering that information to its host. This activity will only be carried out when authorised and the correct documentation has been completed in accordance with legislative requirements. In complying with these policies and procedures for the release of data to third parties it is intended, as far as reasonably practicable, to safeguard the individual's rights to privacy and disclosure will be limited to the following:
- Law enforcement agencies where the images recorded would assist in a specific criminal enquiry
 - Insurance company requests
 - Prosecution agencies
 - Legal representatives
 - The media, where it is assessed by the Police that the public's assistance is needed in order to assist in the identification of victim, witness or perpetrator in relation to a criminal incident. As part of that assessment the wishes of the victim of an incident should be taken into account.
 - The people whose images have been recorded and retained (Data Subject)
 - unless disclosure to an individual would prejudice the criminal enquiries or criminal proceedings.
 - Recorded material shall be processed lawfully and fairly, and used only for the purposes defined in this Code of Practice;
 - Access to recorded material will only take place in accordance with the standards outlined in BS7958 (surveillance camera management and operations) and the Information Commissioners guidelines under the Data Protection Act, which has been given due regard within this Code of Practice.

The release or disclosure of data for commercial or entertainment purposes is specifically prohibited. Members of the police service or other prosecuting agencies having a statutory authority to investigate and / or prosecute offences may, subject to compliance with documented procedures, release details of recorded information to the media only in an effort to identify alleged offenders or potential witnesses.

- 8.6 Viewing of images, when granted to members of the public under the provisions of the Data Protection Act 2018, will take place in a separate and restricted room to ensure confidentiality. Only the person requesting access to the material and the viewing officer, or a designated member of staff, as a witness where necessary, will be present at that viewing.
- 8.7 In criminal cases, access to recorded material must adhere fully to the Police and Criminal Evidence Act 1984, Crown Prosecution and associated Codes of Practice.
Note: Release to the media of recorded information, in whatever format, which may be part of a current investigation would be covered by the Police and

Criminal Evidence Act, 1984. Any such disclosure should only be made after due consideration of the likely impact on a criminal trial. Full details of any media coverage must be recorded and brought to the attention of both the prosecutor and the defence.

- 8.8 Recorded material will on occasion be used for training or demonstration purposes, subject to the limitations set out in section 8
- 8.9 Where the recorded material relates to a criminal offence and publication via the Media including television is desirable to identify witnesses or suspects, this will require the authority of an ACC as per the Association of Chief Police Officers Media Policy.
- 8.10 It is essential that digital recordings do not pass into public circulation.
- 8.11 Media access to surveillance recorded images and prints will only be given in strictly controlled circumstances, following the guidance recommended by the Association of Chief Police Officers in their Media Advisory Group publication dated November 1995. There will be no release of surveillance images or prints where, in the opinion of the police, considerations of commercial gain or entertainment appear to outweigh those of public service.
- 8.12 The Copyright of all recorded digital images originated from this public space Surveillance Camera System remains the property Rushcliffe Borough Council.

9.0 Evaluation

- 9.1 The Surveillance Camera Operators will keep a record of all arrests and notable incidents that have been assisted by the use of the public space Surveillance Camera Systems. These details will be recorded by appropriate predefined comment on the relevant incident log.
- 9.2 The Council's surveillance manager, SRO and SPOC will produce a statistical report annually and will include the numbers of arrests and notable incidents by date and type that have been assisted by the public space Surveillance Camera System. The report should where possible also include a cost benefit analysis of the public space Surveillance Camera Systems and the number and type of complaints that have been attributed to the public space Surveillance Camera Systems, together with an analysis of the technical performance of the system.
- 9.3 Statistical analysis will be carried out on crime and incident trends and particularly on how it appears that the introduction of any public space Surveillance Camera Systems which has affected neighbouring areas.
- 9.4 Reports will be made available to the Police Authority, the relevant local authorities and to the local police / community consultative group.
- 9.5 Rushcliffe Borough Council is committed to providing an efficient and effective service for the benefit of all. As part of this aim we are constantly looking for ways to improve our service to the community. If anyone feel that the Council have in some way not delivered in that commitment, the general public are encouraged to let us know so that we can investigate and, if necessary, put things right.

If anyone wishes to make a complaint, they can enter into the Council's complaints procedure which outlines the steps of the process by completing a complaint from either on line [Online Forms - Rushcliffe Borough Council](#) at or in person or over the telephone. See [Find and contact us - Rushcliffe Borough Council](#) (<https://www.rushcliffe.gov.uk/customerservices/>)

Alternatively, anyone can write to the Council's Complaints Officer at:

Corporate Complaints Officer, Rushcliffe Borough Council, Rushcliffe Arena, Rugby Road, West Bridgford, Nottingham, NG2 7YG. Any complaints regarding the operation of the Surveillance Camera systems should be in writing to Council's complaints department for the attention of the complaint officer.

10.0 Deployment and Review

- 10.1 The deployment policy and procedures will be reviewed annually. The review will be carried out in conjunction with the existing town centre surveillance reviewed by the (SRO) senior responsible officer and Surveillance Camera manager, once completed the reviewed document will be considered by the Council's committee process for approval. A review may be considered at an earlier date, if changes in legislation or system arrangements have occurred which have an impact on this document and the procedures it follows.

11.0 Independent Visitors/Inspections

- 11.1 The objective of the system is to ensure that the policy and procedure detailed above are being fully complied with; therefore, internal audits should frequently take place, no less than every 3 years. In addition, external audit inspectors may visit, observe, comment and report on any of the practices being carried out within the scheme without prior appointment. Any other visitors wishing to observe proceeding will require a prior appointment and appropriate authorisation.

All Council Surveillance Camera systems may be subject to inspections or visits by a member of the Information Commissioner's Office or the Regulation of Investigatory Powers Commissioner. In addition, systems may also be subject to visits/inspections by political party members, Directors, or the Councils' Surveillance Camera manager. However due to highly confidential police operations that can be on-going, visits must be pre-planned, or if they are unannounced and an event is on-going which prevents an inspection, the Surveillance Camera manager must give permission for uninterrupted entry at another date within 5 working days. These visits/inspections are designed purely to ensure that the systems are being run in accordance with current legislation, this policy's guidelines and their own Codes of Practice and to offer advice for improvement where required.

12.0 Regulation of Investigatory Powers Act (RIPA)

NO RIPA observations may commence until approved in writing by the Chief Executive and head of legal services in conjunction with the Council's RIPA officer or appropriate delegated officers, as detailed within the Council RIPA policy.

In order to gain approval, written confirmation of the Police authorisation must be provided by the attending Police Officer, Police Covert Authority Bureau or by the Police Officer managing the investigatory surveillance initiative.

Confirmation of this approval **MUST** be sought from the Police Covert Authority Bureau to ensure it is current / valid.

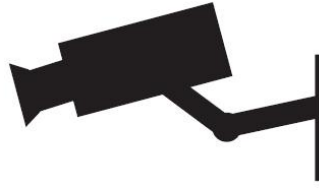
All valid operations must have written police authorisation and Rushcliffe Borough Council authorisation. Only operations with a valid police authorisation supplemented with a written authorisation from delegated officers, should be permitted to commence.

Copies of the authorisation **MUST** be kept within the control room at all times during the operation. Any issues, unauthorised extension/deviation from the original RIPA notice will immediately be report to the relevant nominated officer for consideration

Surveillance camera control room operators **MUST** ensure that authorisations are inspected prior to commencement to ensure they are valid / active. Under **NO** circumstances should surveillance camera control room Operators permit RIPA observations to commence without ensuring the above has been undertaken.

ONLY RIPA authorisations approved by appropriate nominated personal may be undertaken. Written authorisation will be provided and kept within the surveillance camera control room whilst active. Again, surveillance Operatives on duty at the time of surveillance **MUST** ensure that this authorisation is in place and active prior to permitting observations to

Appendix A Impact assessment form



RUSHCLIFFE BOROUGH COUNCIL INTERNAL DATA PRIVACY IMPACT ASSESSMENT FORM

This form should be completed by staff/Councillors/departments and stakeholders requesting the installation surveillance cameras, for example, use in park, recreation grounds, ASB situations or car parks. This does not apply to cameras on the Town Centre Security Services system. This form is to be considered and completed before full consideration to the Surveillance Camera commissioners combined ICO privacy and data protection impact assessment form is completed <https://www.gov.uk/government/publications/privacy-impact-assessments-for-surveillance-cameras>

Name of applicant:

Date:

Position within the Council:

Proposed location for camera(s):

For what purpose(s) will the surveillance be used?	
What are the problems it is intended to address?	
What are the benefits to be gained from its use?	
Can less privacy-intrusive solutions (e.g. improved lighting) achieve the same objectives?	
Do you need images of identifiable individuals, or could the scheme use other images not capable of identifying individuals?	
Will the particular equipment/system being considered deliver the desired benefits now and remain suitable in the future?	
What (if any) future demands may arise for wider use of the	

images and how will you address these?	
What are the views of those individuals (if any) who will be under surveillance?	
What could you do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed?	
Is appropriate signage informing individuals of the camera in place (if required)?	
Proposed time period for installation and duration of the surveillance	
This Section to be completed by senior surveillance officer	
Is the proposed system in accordance with the law? (Primarily the Data Protection Act and Human Rights Act)	
Is it necessary to address a pressing need, such as public safety or crime prevention?	
Is it justified in the circumstances?	
Is it proportionate to the problem that it is designed to deal with?	
What date did consultation take place and with whom.	
Approved by Director of Legal Services	
Date	

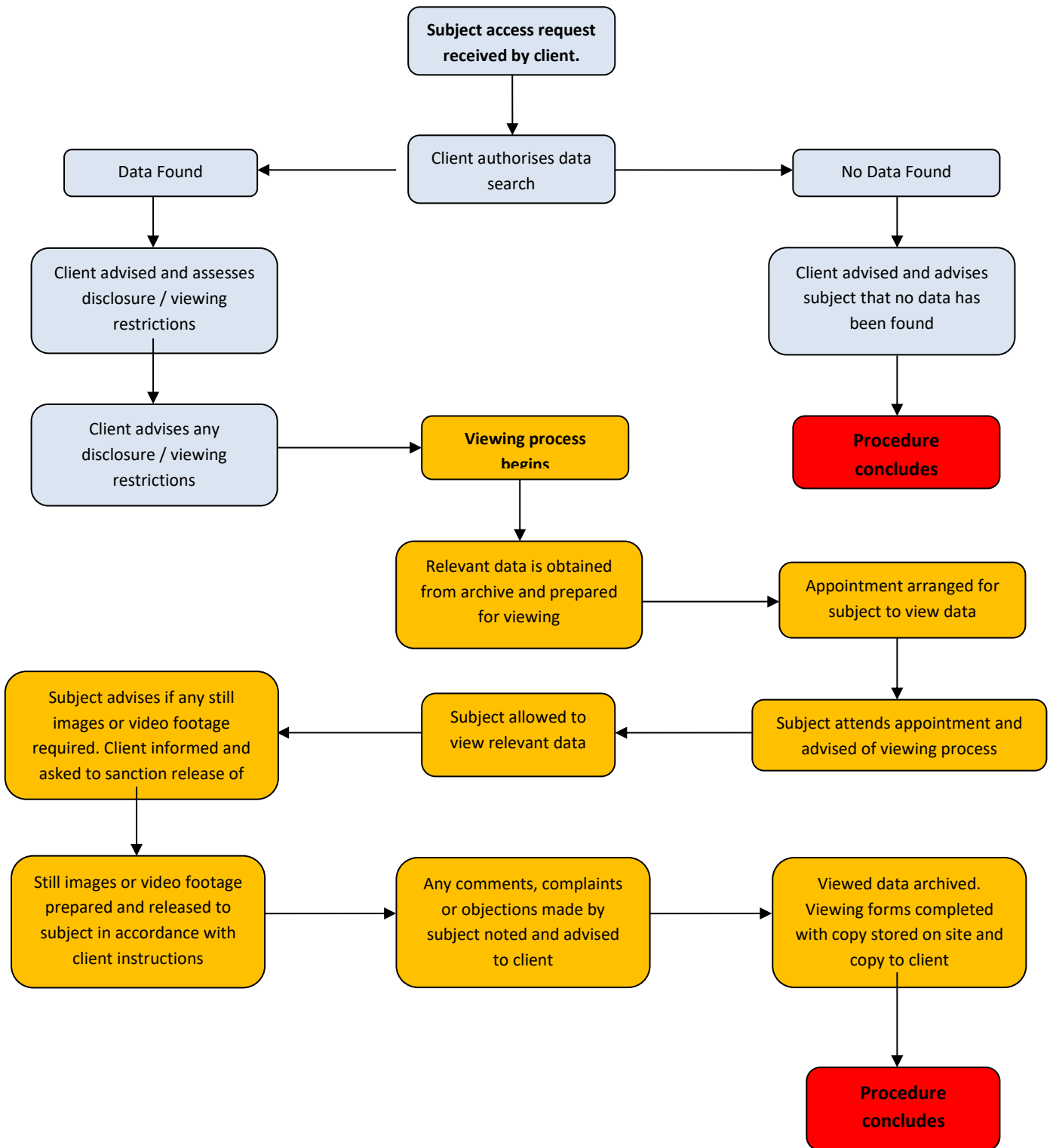
Appendix B The data protection principles.

The data protection principles

1. Personal data shall be processed fairly and transparently which is consistently reviewed to ensure these standards remain in check.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

This is not a full explanation of the principles. More detailed information can be found on the Information Commissioner's website at www.ico.gov.uk.

Appendix C Viewing process.



The completion of this log is to satisfy the need for audit and continuity of image management as required by the Data Protection Act 2018 & any subsequent judicial proceedings

How to apply for access to information held on Council Surveillance Systems

Data Protection Act 2018 (including the General Data Regulations Act 2016)

These notes explain how you can find out what information, if any, has been obtained or retained by the use of public spaces surveillance system deployed by Rushcliffe Borough Council.

Your Rights

Subject to certain exemptions, you have a right to be told whether personal data is held about you. You also have a right to a copy of that information in a permanent form except where the supply of such a copy is not possible or would involve disproportionate effort, or if you agree otherwise. Rushcliffe Borough Council will only give information if it is satisfied as to your identity. If release of the information will disclose information relating to other individual(s) who can be identified from that information, Rushcliffe Borough Council is not obliged to comply with an access request unless

- The other individual has consented to disclosure of information, or
- It is reasonable in all the circumstances to comply with the request without the consent of the other individual(s).

The Council's Rights

Rushcliffe Borough Council may deny access to information where the Act allows. The main exemptions in relation to data obtained or retained from the use of a surveillance system are where the information may be held for:

- Prevention and detection of crime
- Apprehension and prosecution of offenders

and giving you the information may be likely to prejudice these purposes.

The Application Form

ALL sections of the form must be completed. Failure to do so may delay your application

Section 1 Asks you to give information about yourself that will help the Council to confirm your identity. The Council has a duty to ensure that information it holds is secure and it must be satisfied that you are who you say you are.

Section 2 Asks you to provide evidence of your identity by producing TWO official documents (which between them clearly show your name, date of birth and current address) together with a recent full face photograph of you.

Section 3 Asks you to confirm whether you will accept just viewing the information, or if you want a copy of the information.

Section 4 You must sign the declaration.

When you have completed and checked this form, take or send it together with the required TWO identification documents and photograph to:

The Surveillance Manager, Rushcliffe Borough Council, Council Offices, Rushcliffe Arena Rugby Rd, West Bridgford, Nottingham NG2 7HY marked "Private and Confidential"

Section 1 - About yourself							
Title (tick box as appropriate)	Mr		Mrs		Miss		Ms
Other Title (e.g. Dr, Rev., etc.)							
Surname / Family name							
First names							
Maiden name / former names							
Gender (tick box)	Male		Female				
Height							
Date of Birth							
Place of birth							
Your present address (to which we will reply)							
Post Code							
Telephone number							
Email address							
If you have lived at the above address for less than 3 years, please give previous addresses for the period:							
Previous address (1)							
Dates of Occupancy	From		To				
Previous address (2)							

Section 2 - Proof of identity

To help establish your identity your application must be accompanied by **TWO** official documents that between them clearly show your name, date of birth and current address. For example, a birth/adoption certificate, driving licence, medical card, passport or other official document that shows your name and address. You must also enclose a recent full face photograph of yourself.

FAILURE TO PROVIDE THE REQUIRED PROOF OF IDENTITY MAY DELAY YOUR APPLICATION.

Section 3 – Supply of information

You have a right, subject to certain exceptions, to receive a copy of the information in a permanent form. Do you wish to:

(a) View the information only	Yes		No	
(b) View the information and receive a permanent copy	Yes		No	
If (b) how would you like to receive the information?	Collect		Secure email	

Dates of Occupancy	From		To	

Section 4 - Declaration

Declaration (to be signed by the applicant)

The information that I have supplied in this application is correct and I am the person to whom it relates.

Signed by		Date	
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Warning - A person who impersonates or attempts to impersonate another person may be guilty of an offence.

Privacy Notice

To find out how the Council collect, store and retain your personal information please visit our Privacy Notice: [Privacy Policy - Rushcliffe Borough Council](#)

Section 5 - Help us to find the information

If the information you have requested refers to a specific offence or incident, please complete this section.

Please complete a separate box in respect of different categories/incidents/involvement. Continue on a separate sheet, in the same way, if necessary.

If the information you require relates to a vehicle, property or other type of information please complete the relevant section.

Were you: (tick box below)

A person reporting an offence or incident	<input type="checkbox"/>	
A witness to an offence or incident	<input type="checkbox"/>	
A victim of an offence	<input type="checkbox"/>	
A person accused or convicted of an offence	<input type="checkbox"/>	
Other (please explain)		

Date of incident	
------------------	--

Time of incident	
------------------	--

Details of incident	
---------------------	--

Check List

Before returning this form please check:

- Have you completed ALL sections of the form?
- Have you enclosed TWO identification documents?
- Have you included a FULL face photograph?
- Have signed and dated the form?

Further Information

These notes are only a guide. The law is set out in the Data Protection Act 2018.

Further information and advice may be obtained from:

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Telephone: 01625 454 745.

Please note that this application for access to information must be made direct to **Rushcliffe Borough Council** and **NOT** to the Information Commissioner.

Official Use Only

Application checked and legible
 Identity documents checked
 Document details

Date documents returned

Disclosure authorised

Date The Council authorised to disclose data

Checked and completed by

Location

Date

Appendix E Viewing Record Form

Record of Review				
Time:				
Date:				
Operator:				
Persons Present:				
Requester	Rank / Title	No. / First Name	Surname	Station / Office / Dept.
Contact No./s:			Signature:	
Review generated:	In person <input type="checkbox"/>	Telephone <input type="checkbox"/>	Request Form <input type="checkbox"/>	Other <input type="checkbox"/>
Reason for review:				
Incident details or review requirements <small>Continue overleaf if necessary</small>				
Incident location				
Cameras viewed				
Viewed images FROM:	Time <small>[as displayed on image]</small>		Date <small>[as displayed on image]</small>	
Viewed images TO:	Time <small>[as displayed on image]</small>		Date <small>[as displayed on image]</small>	
ACTIONS				
Review only	No action required <input type="checkbox"/>		Any comments:	
EXPORT required	<i>Insert export , storage & handover details below</i>			
Archived MASTER	Secure on HDD <input type="checkbox"/>	CD/ DVD-R <input type="checkbox"/>	Other: <input type="checkbox"/>	
Archived FROM:	Time <small>[as displayed on image]</small>		Date <small>[as displayed on image]</small>	
Archived TO:	Time <small>[as displayed on image]</small>		Date <small>[as displayed on image]</small>	
EXHIBIT Ref. No:			Seal No:	
Storage: Control Room <input type="checkbox"/> Handed to Requester <input type="checkbox"/> or Other:				
Signature of Receiver			Time	Date
Operator Statement	Yes <input type="checkbox"/> No <input type="checkbox"/>		Time	Date

Incident Ref No.

RUSHCLIFFE BOROUGH COUNCIL

OPERATORS SIGNATURE (exporting)

The completion of this log is to satisfy the need for audit and continuity of image management as required by the Data Protection Act 2018 & any subsequent judicial proceedings

Appendix G Surveillance camera overt signs displayed on site



Appendix H Re-deployable surveillance camera system request form

RE-DEPLOYABLE SURVEILLANCE CAMERA SYSTEM

REQUEST FORM FOR DEPLOYMENT

Reference No

(for Office Use only)

To: Rushcliffe Borough Council
Nottinghamshire Police
Community Safety Officer

Name of Applicant: Organisation Represented: Applicants work Address:

Telephone Number: Mobile Telephone Number:

e-mail address:

I request deployment of the Surveillance equipment as follows: -

Start Date End Date

Total Duration: days

Does this request relate to the activities of any named individual or individuals? YES/NO

If the answer to the above question is “YES” the please give full details at Clause 3 on the next page and ensure that RIPA (Regulation of Investigatory Powers Act 2000) authorisation is requested as appropriate.

1.0 Location Descriptions. Would the applicant please fully describe the area to be monitored and NOT the suggested camera location?

Camera on _____ Drive/Road/Street leading onto _____ Road
(Lamppost number _____)

2.0 The Nature of the Problem. Please describe as fully as possible the nature of the problem to be monitored, i.e. the likely number of persons to be involved, the nature of the complaint, when the conduct complained of tends to occur etc?

3.0 What does the installation of surveillance camera system aim to achieve, how will the data be used and what benefits will it bring?

4.0 Have other less intrusive measures been taken (improved lighting etc). What were the results of these?

5.0 Is installation of a camera a proportional step in dealing with the issues?

6.0 What privacy issues may arise from the project and how would these be addressed?

7.0 Justification for the Deployment. Please refer to Section 6 of the procedure and, where you have not already done so, please address the criteria raised.

Approved Y/N (reason why if not approved)

Signed:

Print Name:

Organisation:

Date:.....

Appendix I Site Surveys And Deployment Risk Assessment

REDEPLOYABLE SURVEILLANCE SYSTEM

SITE SURVEYS AND DEPLOYMENT RISK ASSESSMENT

Reference No:

(for Office Use only)

Location:

Site Visit by

And

Date or Dates of Visits:

We hereby certify that we visited the above location on the date or dates stated and our findings are recorded below: -

Signed:

Print Name:

Organisation:

Signed

Print Name:

Organisation

Type of Location (tick all that apply):

Residential		Highway		Retail		Industrial	
Public Space		Urban General		Rural General		Farm Premises	
Playground		Swimming Pool		Old Persons Grouped Home		Pedestrian Underpass	

Availability of Camera Mounting Positions and Power Supplies:

Building external mount		Lighting Column		Tripod Mount in building		Vehicle	
-------------------------	--	-----------------	--	--------------------------	--	---------	--

Full description of location, e.g. building address or lighting column number with sufficient detail for the Highways Agency staff to fit the camera in the correct position

Has permission been obtained to mount the camera? YES/NO

If "YES" who gave that permission:

Name:

Organisation:

Address:

Who will be installing the camera?

Name:

Organisation:

Address:

If other than a lighting Pole is a power supply available?

YES/NO

If "NO" has battery requirement been fully considered?

YES/NO

If "YES" fully describe the source of supply

Has permission been obtained to obtained the supply?

YES/NO

If "NO" what action is being taken to obtain permission?

If "YES" who gave that permission?

Name:

Organisation:

Address:

Consultations (tick as appropriate)

Please note that strict confidentiality must be applied to all consultations. Notes of meetings or other conversations should be recorded separately and filed under confidential cover.

Sector Police Inspector	
Councillors	
Community Safety Officer	
Community Groups	
Witnesses	
Complainants	

Monitoring of Images

Who will monitor the images received from the camera or cameras (referred to as “the Operator” hereafter)?

Name:

Organisation

Where will the Operator be located?

Will he be able to readily contact the Police?

YES/NO

Will there be more than one Operator?

YES/NO

Surveillance Signs

Are there any surveillance signs already in the area?	YES/NO
---	--------

If "YES" are they sufficient for the purpose?	YES/NO
---	--------

Are additional signs needed?	YES/NO
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Who will install any additional signs needed? Name: Organisation Address
