NSG Security Consultants

COMPLIANCE AUDIT OF CCTV
(CLOSED CIRCUIT TELEVISION) CONTROL ROOM OPERATIONS AT EASTLEIGH BOROUGH COUNCIL

Eastleigh Borough Council
Civic Offices
Leigh Road
Eastleigh
Hampshire
SO50 9YN

May / June 2008

Prepared by
Nick Saunders, Partner & Principal Consultant
NSG Security Consultants
COPYRIGHT

Copyright © 2008 NSG Security Consultants

All Rights Reserved.
No part of this publication may be reprinted or reproduced or utilised in any form or by any
electronic, mechanical or other means, known now or hereafter invented, including
photocopying and recording, or in any information storage or retrieval system, without
permission in writing from
NSG Security Consultants.

Warning: the doing of an unauthorised act in relation to copyright work may result in both civil
claim for damages and criminal prosecution.
1.0 Introduction

1.1 NSG Security Consultants have been commissioned by Mr Dennis Chandler, Town Centre Manager, Eastleigh Borough Council, Eastleigh to undertake a Compliance Audit of the CCTV (Closed Circuit Television) operations at Eastleigh Borough Council.

2.0 Scope of the Compliance Audit

2.1 The Compliance Audit has involved:

- an assessment of the CCTV Operation’s Code of Practice and Operations Procedures Manual at the NSG Security Consultants Offices in Cheshire; and
- a visit to the CCTV Control Room in Eastleigh on 22 May 2008 when consultants observed control room operations, consulted with operators and representatives of the scheme’s management and reviewed records held in the control room

3.0 Why Undertake a Compliance Audit?

3.1 The United Kingdom has come along way since the first town centre CCTV surveillance system went ‘live’ in 1984 in Bournemouth. In fact today some believe that the United Kingdom leads the world in the use of CCTV technology to undertake surveillance of the public realm. The following are some of the ‘statistics’ regularly referred to:

- The United Kingdom has a quarter of the world’s CCTV cameras installed
- There are 14.2 million CCTV cameras in the United Kingdom
- A member of the public is likely to be caught on camera 300 times a day

3.2 When CCTV originally appeared it was unregulated and many saw the technology as a valuable deterrent to criminal activity, but as its use has become widespread so concerns over civil liberties and invasions of privacy have in some quarters arisen. As a consequence a mass of legislation starting with revisions to the Data Protection Act in 1998 has been introduced. Despite the legislation some independent organisations, most notably the comparatively recently established CameraWatch claim that up to 90% of CCTV systems may be operated ‘illegally’.

3.3 Whilst the latest Information Commissioner’s report on public attitudes towards public CCTV surveillance shows that public support remains high, the report also shows that there are increasing concerns and expectations on the part of the public, particularly with regards to ensuring that public space CCTV systems are operated in the best interest of those using the public realm.

3.4 The purpose of undertaking a compliance audit is to ensure that the system is being operated in such a way as to meet the original objectives and rationale behind it’s installation, and that no individual or groups of individuals are being put at risk or prejudice. A key feature of the original Information Commissioner’s CCTV Code of Practice was the recommendation that systems should be audited annually to ensure that they are being properly used, and that the findings of the audit should be published to provide public reassurance.

3.5 Furthermore, and contrary to popular belief there is no automatic right to undertake public space CCTV surveillance, it must be justified and regular auditing of system operation helps to continue to provide justification.
3.6 However, it should be noted that a compliance audit is not an assessment of the effectiveness of a public space CCTV system, it is nevertheless an important assessment of whether or not the system is being operated in accordance with current legislation, British Standards and other best practice requirements.

4.0 Undertaking a Compliance Audit

4.1 A compliance audit needs to take account of all relevant legislation, British Standards and other considered best practice, including but not necessarily restricted to the following:

* Data Protection Act 1984 and 1998
* Human Rights Act 1998
* Police and Criminal Evidence Act 1984, subsequent revisions and Codes of Practice
* Freedom of Information Act 2000
* Criminal Procedures and Investigations Act 1996
* Fifth Report of the House of Lords Select Committee on Science and Technology, 'Digital Images as Evidence'
* Home Office Scientific Development Branch (HOSDB) Digital Imaging Procedures and other HOSDB guidance and best practice (where digital recording is employed)
* Guidance published by the BSI (British Standard 7958:2005 CCTV Management and Operation. Code of Practice) and Office of the Information Commissioner, including the new Code of Practice on the use of CCTV
* The joint Home Office and ACPO (Association of Chief Police Officers) National CCTV Strategy
* Security Industry Act 2001 and the Licensing of PSS (Public Space Surveillance) CCTV operators if the operators are contracted personnel

4.2 In essence there are two separate but linked elements to a compliance audit of a public space CCTV surveillance operation:

ensuring that the system is operated in accordance with the existing Operations Manual and Code of Practice; and

ensuring the existing documentation used, complies fully with regards to legislative, British Standard and other best practice requirements

5.0 A Review of the use of the Eastleigh Borough Council Public Space CCTV Surveillance System in 2007 – 08

5.1 Statistics regarding incidents observed by the CCTV Operators using the Eastleigh Borough Council’s Public Space CCTV Surveillance System for the 12 month period April 2007 to March 2008 were provided to consultants.

5.2 In summary:

- A total of 2020 incidents were recorded
- 770 incidents were not categorised
- The Eastleigh Police Attended 1489 of the incidents recorded
- 597 recorded incidents resulted in the detention of 1 or more persons
6.0 An assessment of the CCTV Operation in accordance with the Current CCTV Code of Practice and the Operation Procedures Manual

6.1 The assessment of the CCTV Operation in accordance with the current CCTV Code of Practice and the Operational Procedures Manual was undertaken with regards to the following:

- Purposes of the Eastleigh Borough Council CCTV Scheme
- Signage
- Dummy Cameras
- Control Centre Management and Operation
- Control Centre – Security
- Ownership / Copyright Issues
- Use of Downloaded Images
- Cataloguing of Downloaded Discs
- Erasure of Recorded Images
- Storage of Transferred Images
- Use of Sound
- Use of and Access to Recorded Images
- Control Centre – Procedure for Dealing with Incidents Seen by Operators
- Police Use of Recorded Images
- Provision of Recorded Stills
- Eastleigh Borough Council Use of Recorded Images
- Evaluation, Monitoring and Audit of Scheme
- Photo Library
- Service and Maintenance

7.0 Summary of the Consultants Findings

7.1 The compliance audit revealed that Eastleigh Borough Council’s Public Space CCTV Surveillance Management and Operators are substantially compliant with the Code of Practice and Operational Procedures Manual governing the proper and legal use of the Public Space CCTV Surveillance System.

7.2 Non-compliance are few, minor in nature and easily corrected.
There are some minor changes required to the Code of Practice and Operational Procedures Manual in line with changes in legislation, British Standards and best practice introduced since the documents were first published.

The Eastleigh Borough Council’s Public Space CCTV Surveillance Management and Operators should be congratulated on what is one of the best run Public Space CCTV Surveillance operations reviewed by consultants in more than 12 year