



PRODUCT CERTIFICATION ASSESSMENT REPORT

BS7958:2015 Code of Practice for the management and operation of CCTV

Client Name: Slough Borough Council
Address: Regulatory Services,
Old Town Hall (Claycots School),
Bath Road,
Slough. SL1 3UQ

Companies House Reg: Not applicable
Client Ref: BERK063
Assessment Phase: Certification Audit
Date(s) of assessment: 14th August, 2019

	<u>Name</u>	<u>Position</u>
Assessment Team:	Stephen Grieve	Lead Auditor
Client Representatives:	Peter Webster	CCTV & Careline Centre Manager

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

An Electronic copy of this report has been left with the client

Signed

SSAIB Lead Auditor

Print Name: Stephen Grieve
Date: 16th August 2019



Assessment Objectives

To demonstrate conformance with the requirements of:

- BS7958:2015 for the management and operation of CCTV

Scope of Assessment

This assessment was carried out with reference to the following:

- Code of Practice for the management and operation of CCTV BS7958:2015.

The scope of the assessment was as stated and conducted at the CCTV & Careline Centre, Old Town Hall, Claycots School, Bath Road, Slough SL1 3UQ

Limitations

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

Recommendation / outcome: Certification is recommended following acceptance of this assessment report by the SSAIB reviewer.



Introduction

This report presents the findings of a Certification Audit against the requirements of BS7958:2015 Code of Practice for the management and operation of CCTV, which was conducted in relation to Slough Borough Council, Regulatory Services, CCTV & Careline Centre, Old Town Hall, Claycots School, Bath Road, Slough SL1 3UQ

Summary of the Audit

The level of control and conformance against this Code of Practice was evidenced to be of a good standard, with no Non-Conformances raised and a total of 3 Opportunities for Improvement (OFI's) identified.

BS7958:2015

Principles and management of the CCTV scheme

A CCTV camera system is installed within areas of the borough where crime and disorder and community safety priorities exist. Working closely with Thames Valley Police and other partners, the Control Centre operates 24/7 x 365 delivering a full range of community focused services, including the operation of more than 280 fixed installation CCTV sites and 6 high quality re-deployable wireless cameras, which are utilised in response to changing crime priorities. The locations of the cameras are published on the Council website at <http://www.slough.gov.uk/crime-prevention-and-emergencies/cctv.aspx> where a wide range of other information in relation to the system is also published. Much of this information is soon to be replaced with updated publications, pending a successful outcome to this certification audit. The CCTV Operators also use and manage the Slough Town Against Crime (STAC) retail and Pub Watch radio systems.

The CCTV system underwent a major refurbishment and upgrade programme in 2012. The Centre boasts a state of the art digital video monitoring and recording system capable of producing high quality video evidence for the identification of suspects and the prosecution of offenders. The Centre also monitors remote alarm systems, out of hours key holding, Lone Worker and emergency contact services. The effectiveness and functionality of the system is checked twice daily by CCTV Operators.

The CCTV scheme is registered with the Information Commissioners Office (Z6795420), expiring on 19th June 2020 and is operated for a defined purpose which includes 'crime prevention and prosecution of offenders'. Recorded images are kept for 31 days before being erased automatically. The scheme makes no of audio recordings, facial recognition or video analytics. While there are currently ANPR cameras installed at a site on Slough High Street, for controlling rising bollards and as part of a prohibition on vehicle access, these are shortly to be replaced by a 'virtual bus gate' and the ANPR system decommissioned however, the overview cameras will be retained. Appropriate signage for the scheme is installed on all camera poles and at the borough boundary (**see OFI 01**).

The scheme is managed through a documented 'Code of Practice' and separate Policy & Guidance Manual, both of which were updated in January 2019 and include all of the recommendations in Clause 4.2.1 (a)-(d). Access to recorded images is documented within both documents and records relating to disclosures made are currently retained for a period of 12 months (**see OFI 02**).

An annual Policy and Scheme Review was conducted on 17th January 2019 and Action Plan developed in response to issues identified. A separate Annual Evaluation Audit, covering the year to 31st March 2019, was conducted by an independent consultant and this also serves as the Annual Report for the scheme, fully meeting the recommendations of Clauses 4.3.6 and 4.3.7. These confirmed that no complaints in relation to the CCTV scheme have been received by the Council during that period. The complaints process follows a corporate approach for all complaints, compliments and comments, available on-line.

Personnel

The Control Centre is staffed on a 24/7 basis by a total of four teams, each comprising two CCTV Operators, who all work on a roster system that provides for four shifts 'on' and four shifts 'off'. A CCTV Co-ordinator and a CCTV & Careline Manager undertake the supervisory and management roles and all personnel are employees of the Council. Security Screening has been completed for all Control Centre staff by the Council HR Department, conforming to the recommendations of BS7858 and with separate clearances to the Enhanced Children and Adults DBS (Disclosure and Baring Service) and further Police vetting in order to be able to access and operate the Airwave Radio System.

All CCTV Operators have successfully completed separate training and qualification in BTEC Control Room Operations and TAVCOM Control Room Procedures. No licensable activity as defined by the Private Security Industry Act is currently being undertaken by any of the Control Centre staff, albeit they have historically held SIA licences in the CCTV sector. Any new staff are subject to a corporate induction, followed by a 5-day CCTV & Careline Induction Training Plan. A CCTV Training Needs Analysis (TNA) forms part of the annual Appraisal process and covers 5 separate categories, each of which is subject to a score to determine the extent of any training that may be required.

CCTV Control Centre

The Control Centre is a secure facility within the Old Town Hall, which now functions as Claycots School, with access strictly controlled by means of an electronic fob, intercom, internal CCTV and 'air lock' doors. External security shutters are fitted to all windows, along with reflective foil on the glass. All visitors to the Control Centre are required to sign a Visitor/Contractors Log, while staff entry is recorded using an electronic log-in system.

The ergonomics of the CCTV Control Centre are of a high standard and include an appropriate layout for two operator workstations, a review desk and a co-ordinators desk. A fully functioning air conditioning system and adjustable lighting was operating during the audit. A Health & Safety Audit was conducted in November 2018 and included the annual on-line Display Screen Equipment (DSE) Assessments for all CCTV Operators. Welfare facilities are located within the secure area of the Control Centre.

Incident handling

Fully documented procedures for CCTV Operators are contained in the CCTV Procedures Manual. Associated forms and records are well maintained, comprehensive and up to date.

Incidents handling is managed by use of the Veracity (formerly iComply) VTAS Pro logging system (v8.4.4). On creating a new incident log the system allocates a Unique Reference Number (URN) and the type of incident and a range of sub-categories are then selected by the operator from drop down menus. The system automatically logs which cameras have been utilised and this is how analytical data is subsequently extracted to compile the annual Evaluation Audit. Footage is saved to a bank of 13 Tecton Networked Video Recorders (NVR), all of which are stored in a secure cabinet that is itself located in a basement secure server room which is supported by a UPS and emergency generator.

Privacy and disclosure issues

The CCTV camera installations are all historical locations and no privacy zones have been configured into the system. A CCTV Privacy Policy has been implemented and all CCTV Operators have been fully briefed during their induction on their obligations for respecting privacy and the consequences of any illegal activities. They are all required to abide by a Code of Conduct.



The CCTV Manager has recently completed the Data Protection Impact Assessment (DPIA) template published by the Surveillance Camera Commissioner for the scheme and a copy of this was reviewed during the audit (**see OFI 03**).

There are detailed procedures documented in the Code of Practice and separate Procedures Manual over the disclosure of data and these are supported by the use of a DVD Tracking Sheet, which includes a DPA Notice; Witness Statement; Digital Evidence Log Sheet and Working Copy DVD. The Council retains the Master Copy of any recording pending their receipt of disposal instructions. At the time of the audit there were 15 disclosure packs awaiting collection by the Police and these shall be retained for a maximum period of 12 months if for any reason their collection is delayed. Thereafter the working copy is securely destroyed and the Tracking Sheet retained in a separate file.

The 2018/19 Evaluation Audit/Annual Report confirmed that there had been 2077 incidents recorded by CTV Operators over the year, with 1149 reviews conducted by the Police and a total of 487 evidential DVD's disclosed to them. In addition, during the same period there had been a total of 385 requests for disclosure received from Third Parties, including Solicitors and Insurers, as a result of which 32 DVD's had been issued. There had been no Subject Access Requests received and no authorisations received under the Regulation of Investigatory Powers Act (RIPA).

Recorded material management

The CCTV system functions over a Virgin point-to-point fibre network and is maintained by an external contractor. The network monitoring system polls the entire network and auto-locks are installed on all ports. The Council is currently seeking confirmation from its supplier of the existing network security standard.

The quality of images viewed during the audit were all of a high standard for both daytime and night time recordings. An NTP clock is utilised to maintain the time accuracy of the system.

Documentation

Accurate and full records are maintained by staff at the Control Centre. Following successful completion of this audit the CCTV & Careline Manager intends publishing a wide range of material on the Council website relating to the CCTV system. This will include an updated Camera location map; Surveillance Camera Self-Assessment; DPIA, CCV Code of Practice; CCTV Policy; CCTV Scheme leaflet and the Annual Review.

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

Not applicable – Certification Audit

BS7958:2015

Non-conformances identified

Ref	Clause	Issue	Agreed close out date
N/A			

Opportunities for Improvement

Ref	Clause	Issue
N/A		



Issues raised from the current audit:

BS7958:2015

Non Conformance 0
 Opportunities for Improvement 3

Elements of the standard assessed		BS 7958:2015
Principles and management of the CCTV scheme	✓	4.1, 4.2, 4.3, 4.4
Personnel	✓	5.1, 5.2, 5.3
CCTV Control Centre	✓	6.1, 6.2, 6.3
Incident Handling	✓	7.1, 7.2, 7.3, 7.4, 7.5
Privacy and disclosure issues	✓	8.1, 8.2, 8.3, 8.4
Recorded material management	✓	9.1, 9.2, 9.3, 9.4.2, 9.5
Documentation	✓	10.1, 10.2, 10.3

Documentation reviewed

- ICO Registration Z6795420
- Slough Borough Council Code of Practice for CCTV – dated January 2019
- Slough Borough Council CCTV Policy & Guidance Manual – dated January 2019
- CCTV Privacy Policy
- Minutes from 2019 Annual CCTV Review Meeting – dated 17/1/19
- CCTV Evaluation Report for 1st April 2018 - 31st March 2019
- Privacy Impact Assessment – May 2016
- Data Protection Impact Assessment – August 2019
- CCTV Control Centre Visitors Register
- Health & Safety Audit – November 2018
- CCTV & Careline Induction Training Plan
- CCTV Training Needs Analysis

BS7958:2015

Non-conformances identified

Ref	Clause	Issue	Agreed close out date
N/A			

Opportunities for Improvement

Ref	Clause	Issue
01	4.1.3	The Council may wish to consider introducing an annual audit of signage to ensure that it remains present and visible at all current locations.
02	4.3.3	The Council should note that the retention period for records of all requests and authorisations for disclosure is a minimum of two years.
03	8.1	The Council should now update the DPIA to include the re-deployable cameras and those installations not already listed.



Next Assessment

Date of next assessment: 12 months
Assessment phase: Surveillance

Client Details

Confirm the number of employees

Are any changes planned to the scope? If yes, give details.

Are any additional actions required by SSAIB Head Office?