

London Borough of Brent CCTV Strategy

October 2015

1 Executive Summary

1.1. This strategy outlines the future plans for Brent's CCTV service for the period 2015-2018. The main features of this strategy are to:

- Support community safety priorities and working in partnership to reduce crime and anti-social behaviour
- Increase the number of operational mobile 4G CCTV cameras whilst removing redundant cameras from the network, hence increasing the efficiency of the network
- Ensure compliance with the Surveillance Commissioner's code of practice
- Explore opportunities for sharing CCTV with another borough to reduce costs.

This strategy only covers the Brent Community Safety CCTV network, which includes cameras used for crime reduction and detection, waste enforcement and moving traffic offences. Systems within council buildings and those run by other organisations are not included within the scope of this strategy.

2 Introduction

- 2.1 The London Borough of Brent operates 182 active CCTV cameras from its control room in the Brent Civic Centre. These cameras are used primarily for community safety, but are also used for the purposes of traffic and parking enforcement, housing estate monitoring, and environmental/fly tipping monitoring, amongst others. Brent also shares video feeds with external stakeholders such as Transport for London, the Metropolitan Police, and the borough of Camden to assist with their respective operations. During events at Wembley Stadium, Brent CCTV control room plays a key part in controlling access and egress for people and traffic.
- 2.2 The control room employs seven full-time control room officers and one control room manager and is overseen by Brent's Community Safety and Public Protection service unit.
- 2.3 The London Borough of Brent has an overarching Community Safety Strategy which clearly defines the issues that partner agencies (including the Council, Metropolitan Police, London Fire Brigade, National Probation Service, Community Rehabilitation Company and Clinical Commissioning Group) have agreed to prioritise to enable partners to deliver services consistently. The Community Safety Strategy Vision is:

Making Brent a safe place to live, work and visit

- 2.4 Underpinning this vision are six priorities:
- Anti-Social Behaviour
 - Tackling Gang Violence
 - Violence against Women and Girls
 - Reducing Reoffending
 - Child Sexual Exploitation
 - Tackling Radicalisation
- 2.5 These aims will be supported by the CCTV Strategy through continuing to work with our Community Safety partners in the Safer Brent Partnership to maintain enforcement activity and improve the feelings of safety of those living, working and visiting the Borough.

3 Vision

- 3.1 To enhance community safety, assist in developing the economic well being of the London Borough of Brent and encourage greater use of the town centres, estates and car parks.

4 Aims and Objectives

4.1 To achieve this Vision the key aims of the London Borough of Brent CCTV Strategy are:

- Deter offenders from committing crime and disorder, including environmental crime.
- Identify offenders and support criminal justice proceedings to help bring offenders to justice.
- Ensure that all fixed and mobile CCTV is being used cost effectively and to its full advantage by reviewing, monitoring and continuing to investigate new and developing technology solutions, including but not limited to vehicle mounted cameras, wireless deployable cameras and Automatic Number Plate Recognition (ANPR) cameras.
- Increase the public perception of safety.
- Assist in traffic management
- Support responses to the management of emergencies
- Assist in town centre and event management

5 Context for the strategy

- 5.1 Brent last produced a CCTV strategy in 2007 and a technical review in 2013. It outlined the position of the system at the time, aims and objectives, and, in particular, proposals for the system expansion. Since then, the funding environment for CCTV has changed and focus has shifted from expansion to efficiency. The operating budget for CCTV is tightening while operating costs—notably transmission and maintenance costs—are rapidly increasing. To complicate matters, new legislation governing the use of CCTV for parking enforcement could drastically reduce the income generated by the service.

6 Key Objectives

- 6.1 We will reduce the number of fixed CCTV cameras, removing those that cannot justify their contribution to community safety
- 6.2 We will increase the number of mobile deployable CCTV cameras, with a clear, transparent system in place for their deployment to areas of need.
- 6.3 There will be no reduction in the total number of cameras available
- 6.4 We will seek to gain efficiencies and advantages through better tendering and procurement arrangements, including the replacement of the oldest CCTV cameras
- 6.5 We will develop opportunities to provide a monitoring service for the CCTV cameras of other organisations, including housing providers
- 6.6 We will never use dummy or fake cameras as part of our network.
- 6.6 We will ensure compliance with the Surveillance Commissioner's CCTV Code of Practice
- 6.7 We will explore opportunities for recruiting and training volunteer CCTV operators to complement existing staff
- 6.8 We will explore the opportunities for sharing the CCTV service with another borough.

7 CCTV History and Background

- 7.1 Brent's CCTV service began in 1996 with the installation of four cameras along Wembley High Road to support crowd management and the prevention of disorder associated with the UEFA 1996 European Football Championship. Subsequent expansion through the later part of the 1990s followed within Wembley and also in Harlesden and Neasden and within the South Kilburn Estate.
- 7.2 In 2001 funding was secured from the Home Office for the capital costs of a scheme to cover parts of Kilburn High Road and further parts of the South Kilburn Estate.
- 7.3 With the opening of the new Wembley Stadium a further 30 cameras were installed to facilitate traffic and crowd management. From 2007-08 for four years the Council made available capital funding of £135k per annum for further expansion covering Willesden, Kingsbury and Church End. In 2009 the Council decided to use CCTV for enforcement of Moving Traffic Offences and the network of cameras was further expanded to allow for enforcement at these sites.
- 7.4 Technological advancements allow the Metropolitan Police to view images directly from the police control centres at Hendon, Bow, Lambeth and New Scotland Yard. From Brent's control room, images can be sent directly to these locations, or locally to the police Integrated Borough Operations office at Wembley speeding up response times to incidents.
- 7.5 The VIIDO (Visual Images, Identifications and Detections Office) unit of the Metropolitan Police, specialising in use of video footage, have access to Brent's digital recording system to enhance greater police use of recorded evidence
- 7.6 There are at present 182 fixed cameras in the Brent network.
- 7.7 Brent's cameras are in the correct locations to match demands from crime. Those that are not will be decommissioned.

8 Legal Context

- 8.1 Under section 17 of The Crime and Disorder Act 1998 the Council has a duty to exercise its various functions with regard to the likely effect on, and the need to do all it reasonably can, to prevent crime and disorder in its area.
- 8.2 Where this can be justified on planning grounds, the Council can require the provision of CCTV cameras by way of a condition or under a section 106 agreement, when granting planning permission for a new development.
- 8.3 Provision of CCTV for the purposes of traffic management and crowd safety would fall within the Council's powers under section 111 of the Local Government Act 1972 to do anything which is calculated to facilitate or is incidental to the discharge of any of its functions (with reference to its function of securing safe use of the public highway).
- 8.4 Any procurement of new CCTV cameras and associated maintenance services must be undertaken in compliance with the Council's Contract Standing Orders and the Public Procurement Regulations 2006 (the EU Regulations).

Article 8 in Schedule 1 to the Human Rights Act states that "everyone has the right to respect for his private and family life, his home and his correspondence". The use of CCTV could potentially constitute interference with a person's "private life". However, paragraph 2 of Article 8 permits such interference where this is in accordance with the law and is necessary in a democratic society in the interests of (inter alia) public safety, the prevention of crime and disorder or the protection of the rights and freedoms of others. Provision of CCTV under the powers referred to 4 above is clearly "in accordance with the law". The purposes for which CCTV is used as referred to in the Strategy are considered to fall within paragraph 2 of Article 8 but the Council would need to ensure that any future use can be justified as an interference with Article 8 rights.

- 8.5 CCTV has also been the subject of national debate following the introduction of the Protection of Freedom Act 2012 which set out a number of recommendations in relation to CCTV, including the appointment of a CCTV Regulator and publication of a Surveillance Camera Code of Practice. There have also been changes to existing legislation such as the Regulation of Investigatory Powers Act 2000 and Deregulation Act 2015 which have changed the way CCTV is used by local authorities.
- 8.6 Brent already has robust deployment and review processes in place to ensure that CCTV is used to the best effect for the community. However, CCTV alone is not a complete solution to any problem and is only one of the many measures used by the Community Safety Partnership to address issues being experienced by communities. The Council remains committed to ensuring that the limited CCTV resources available are used where appropriate to the best effect for the borough's residents and visitors.
- 8.7 When introducing the new Surveillance Camera Code of Practice to the House of Lords Minister for Criminal Information, Lord Taylor of Holbeach, said: 'The government favours the use of CCTV and automatic number plate recognition systems as a crime fighting and public protection tool. It supports the use of overt surveillance in a public place when it is in pursuit of a legitimate aim; necessary to

meet a pressing need; and proportionate, effective, and compliant with any relevant legal obligations. Like the public, the government expects that where CCTV is deployed it is as effective as it can be in meeting its stated purpose and has appropriate privacy safeguards.'

8.8 The Protection of Freedoms Act 2012 set out a number of recommendations in relation to CCTV, and the subsequent Surveillance Camera Code of Practice was published in June 2013. The Surveillance Camera Code of Practice is intended to increase understanding of existing legal obligations in relation to the overt use of surveillance camera systems in public places, promote good practice and provide a single source of bespoke guidance, encouraging system operators to adopt the 12 guiding principles:

- Use of a camera system must be for a specified purpose and necessary to meet an identified pressing need.
- The use of a camera system must take into account its effect on the privacy of individuals, with regular reviews
- There must be transparency, including a published contact point for access to information and complaints.
- There must be clear responsibility and accountability for all system activities.
- Clear rules, policies and procedures must be in place.
- No more than the required images or information should be stored.
- Access to retained images and information should be restricted with clearly defined rules on who can gain access and for what purpose.
- 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.
- Images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- 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.
- Camera systems should be used in the most effective way to support public safety and law enforcement to evidential standard.
- Any reference databases should be accurate and kept up to date.

8.9 The Surveillance Camera Code of Practice is also reflective of the existing Data Protection Act 1998 "Data Protection Principles" already adhered to by the London Borough of Brent CCTV System. These specify that personal data must be:

- Processed fairly and lawfully.
- Obtained for specified and lawful purposes.
- Adequate, relevant and not excessive.
- Accurate and up to date.
- Not kept any longer than necessary.
- Processed in accordance with the "data subject's" (the individual's) rights.
- Securely kept.

- Not transferred to any other country without adequate protection in situ

8.10 The London Borough of Brent CCTV service already has in place robust processes to ensure compliance with the relevant requirements set out in the Regulation of Investigatory Powers Act 2000 and Human Rights Act 1998. These are regularly inspected by the Office of the Surveillance Commissioner.

9 Deployment of Fixed CCTV cameras in Brent

- 9.1 A large proportion of the council's CCTV provision was installed between 10 and 20 years ago, with the majority being installed as a result of Home Office funding. Whilst there is no longer a defined funding stream for CCTV, in the last five years additional cameras have been funded from various sources, including Transport for London and Regeneration projects. The cost of installing a single CCTV camera is usually £20,000 plus an additional £2,500 per annum in maintenance, electricity and transmission costs. The CCTV Service does not have an established budget to increase the current CCTV provision. Indeed, a more pressing need is to replace ageing cameras with modern stock; each camera has a recommended lifespan of around 15 years. The majority of Brent's cameras are analogue with expensive and cumbersome transmission costs; a move towards replacing these with modern digital, HD cameras will be undertaken through the re-commissioning of Brent's transmission circuit rentals.

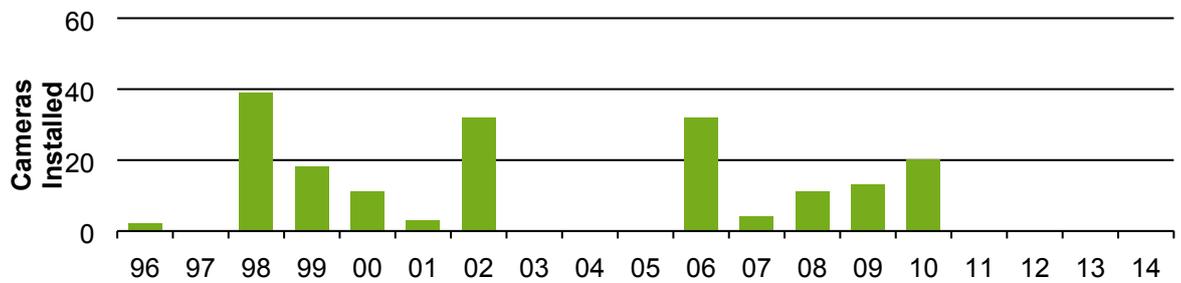


Figure 1: Brent CCTV- Year of camera installation

- 9.2 The most pressing requirement is ensuring the oldest cameras – which are often in the busiest locations – are adequately maintained or replaced. We are negotiating a renewal of our CCTV transmission contract which will include the replacement of 60 of our oldest, most-utilised cameras.

Requests for new deployments of CCTV cameras

- 9.3 The CCTV Service is regularly approached by partner agencies, internal council departments and Members to consider installing CCTV at new locations. Currently there is no budget available for the installation of new cameras and this is unlikely to change. The investment in mobile deployable technology will give the flexibility to provide cameras at locations suffering from particular crime and disorder issues as part of a problem-oriented approach. More details can be seen in Section 10.

10 Deployable Mobile Cameras - Towards a more flexible CCTV service

- 10.1 With some cameras approaching their 20th year of operation, and others offering limited value either through poor placement, image quality or lack of proximity to crime hotspots, there is an opportunity to reduce the number of fixed cameras and replace these with mobile, deployable cameras, able to be moved into hotspot locations as part of a response to a crime or disorder trend. Modern 4G technology allows for high-resolution imagery and close operator control of mobile cameras. Without the requirement of underground cabling installation is relatively straightforward and costs are reduced.
- 10.2 A mobile 4G CCTV camera can be purchased for around £8,000 each as opposed to a fixed camera's £25,000 cost. While each location move has a cost of around £400, mobile cameras are unlikely to be moved more than four times a year; meanwhile the transmission costs of a fixed camera is likely to be around £400 a year per camera. Therefore there are both strong economic and tactical arguments in favour of a move to reduce the number of fixed cameras and increase the number of mobile deployable cameras. We do not anticipate reducing the total number of cameras operating in Brent, but instead will have a more flexible model of camera deployment.
- 10.3 Given the expense and inflexibility of fixed CCTV cameras, recently Brent has invested in seven deployable mobile cameras which can be installed at locations experiencing particular levels of crime and ASB. These cameras use 4G mobile technology to send the signal back to the control room.
- 10.4 Deployments are agreed through applications to the Local Joint Action Group (LJAG). This is a monthly partnership problem solving meeting which seeks to tackle location-based crime and disorder issues. Requests for CCTV have to be backed up with solid evidence demonstrating the scale of the issue and how CCTV will help resolve this, and be approved by the LJAG chair. All requests must include evidence of public consultation with those who are likely to be surveilled; this could include residents whose homes are in the viewing area of the camera or businesses operating in that zone. Requests are then passed to the Mobile CCTV Committee who examine all bids and prioritise requests against current deployments. If the request is approved, the bidder should work with local residents and resident's groups to decide the exact location of the camera.
- 10.5 A further 10 deployable cameras are likely to be added to the deployment roster by December 2015, taking the total available to 21. This will greatly increase the ability of the partnership to respond to incidents, and replace the thirty fixed cameras due for decommissioning.
- 10.6 When deployments are agreed, the new locations will be publicised on the Brent's website and will be communicated to key stakeholders, including local councillors in affected wards, police teams and residents groups where appropriate. These groups will also be informed when cameras are removed.

11 Identifying opportunities for decommissioning cameras

11.1 The Surveillance Commissioner has made clear in point 1 of the CCTV Code of Practice that:

“Use of a camera system must be for a specified purpose and necessary to meet an identified pressing need.”

11.2 With this in mind, and to help identify possible efficiencies through the decommissioning of unnecessary cameras (each camera has a cost per annum in transmission and maintenance costs; this differs depending on camera type and transmission method, with cameras on Brent’s private network being substantially cheaper), an analysis of incidents recorded by each camera between March and September 2015 took place.

11.3 This revealed 30 cameras that had either: recorded zero incidents in the period and are therefore prime candidates for decommissioning; had been installed for a purpose which was no longer relevant; had views which were no longer operational; or could be transferred to another organisation. These are:

Camera no.	Ward	Location	Transmission and maintenance costs
3	Harlesden	High Street Harlesden Opposite Crownhill Road	£732
72	Tokyngton	River Brent	£540
91	Welsh Harp	Bridge PTZ	£956
92	Welsh Harp	Pedestrian bridge Gt Central Way	£956
93	Welsh Harp	Pedestrian bridge Gt Central Way	£956
99	Stonebridge	Bodium Way	£1208
100	Park Royal	Twyford Abbey Road	£1208
102	Brondesbury Park	Kilburn High Road/Christchurch Avenue	£750
103	Brondesbury Park	Kilburn High Road/Christchurch Avenue	£750
120	Kilburn	Cambridge/Princess Road	£534
131	Kilburn	Stuart Road	£534
133	Dollis Hill	Comber Close	£725

134	Dollis Hill	Comber Close 2 Play area (Bourne Close)	£725
135	Dollis Hill	Ainsworth Close	£725
161	Stonebridge	Drury Way	£560
174	Tokynghon	Argenta Way	£1062
212	Wembley Central	Brent House roof	£560
213	Wembley Central	Olympic Way*	£560
214	Wembley Central	Olympic Way*	£560
215	Wembley Central	Olympic Way*	£560
216	Wembley Central	Olympic Way*	£560
217	Harlesden	Acton Lane/Winchelsea Road	£1049
218	Harlesden	Minet Avenue	£1431
225	Stonebridge	Rainsford Road	£2504
235	Preston	Bridge Road	£560
243	Tokynghon	Wembley Hill Road/Royal Route	£560
249	Kensal Green	o/s 158 High Street	£540
251	Stonebridge	Rainsford Road	£540
252	Harlesden	Buckingham Road	£540
257	Harlesden	Craven Park	£540

*will be transferred to Wembley Park

- 11.4 Decommissioning these cameras will save £23,985 per annum in transmission and maintenance costs, with minimal impact on public safety, as well as providing a large supply of spare parts to keep other cameras running while reducing maintenance costs.
- 11.5 There are a further 41 cameras with fewer than five incidents recorded in that time period (for comparison, the busiest five cameras have 517 incidents between them). These will be examined as part of the second tranche of decommissioning.
- 11.6 Decommissioning of the initial 30 cameras will take place once consultation has taken place with relevant parties. Although a camera may not have a community safety role, there may be specific circumstances which prevent its decommissioning of which we are currently unaware.
- 11.7 We will seek to decommission all cameras which do not have a justifiable presence, while maintaining our camera provision through the deployment of mobile 4G cameras.

12 Improving CCTV efficiency

- 12.1 A 2014 review of Brent's CCTV found potential efficiencies to support the long-term sustainability of the CCTV service. These include:

Decommission or re-locate redundant cameras

- 12.2 As per the commentary above, all cameras that do not have a justifiable existence will be taken out of service.

Negotiate a discounted transmission contract extension and conduct a detailed study of future options

- 12.3 The current transmission contract is being renewed and will include a provision for the replacement of Brent's oldest cameras – see below.

Renegotiate maintenance contract and reduce preventative maintenance visits

- 12.4 The existing maintenance contract expires in September 2015 and renewal will place lesser emphasis on preventative maintenance.

- 12.5 It is proposed that we seek to roll the contracts for maintenance and transmission into a single contract from 2017. This should produce further savings through economies of scale.

Replace existing 3G cameras with new 4G rapid re-deployable cameras

- 12.6 Eleven 4G cameras have been purchased and will replace the existing 3G cameras; a further eight cameras will be in service by the end of 2015. These deployable cameras are much-used and support an operational response to ongoing location-based issues.

Align Operator Shifts to Demand

- 12.7 The CCTV control room is staffed by six control room officers, one senior control room officer, and one control room manager. Shifts have been arranged so that the maximum capacity occurs at periods of the highest demand.

- 12.8 This leaves the control room unstaffed for four hours each day except Friday morning (six hours) and Sunday morning (two hours). Although not ideal this was a direct result of a consultation with the Police as part of a previous cost cutting exercise.

- 12.9 At some points during the day, shifts are poorly matched to reported activity levels. In particular, the two-hour period between the end of the cover shift and the start of the night shift leaves a single control room officer during one of the busiest times of day. Conversely, two shifts overlap during low-activity periods in the early afternoon. As a result of this analysis, shift patterns have been changed to increase

staffing levels at peak times. However this would also be an opportunity for volunteer operators (see below) to complement staffing.

- 12.10 Control room officers also reported difficulties meeting police demand during the early morning hours on weekends. Some nightclubs close well into the morning, after which police typically begin responding to incidences of anti-social behaviour and criminal activity. This occasionally causes control room officers to have to work past the scheduled 6 a.m. end of the night shift.
- 12.11 Increasing the capacity through the recruitment and training of volunteer CCTV operators (see below) at these peak times will be explored through the period of the strategy.

Formalise and redesign processes

- 12.12 Suggestions made to operator processes have been undertaken and are currently being trialled.
- 12.13 We will develop a standardised operating model and improved internal documentation to provide a more consistent and efficient delivery of services.
- 12.14 The layout of the control room has been identified as being unsuitable for operations. Given the forthcoming move of parking CCTV to unmanned operations, it is proposed to reconfigure the rooms in this area (control room, BECC, digital post room, parking CCTV office) in order to create a more efficient control room. The BECC currently occupies a significant area and could be sacrificed for a stronger control room, with BECC duties being given to a standard meeting room, as happens in many other local authorities.

Upgrade to Digital HD Cameras

- 12.15 Retendering of the transmission contract in 2016 will seek to incorporate the provision of 66 new digital HD cameras to replace the oldest stock. By including the provision of cameras in the contract for transmission services at each renewal, the entire camera stock can be upgraded and replaced over a six-year period.

Estate Monitoring

- 12.16 A Housing Provider has signed the first estate monitoring contract and further work to identify opportunities is being undertaken. Income from estate monitoring will be offset against capital expenditure.

Improving Communications

- 12.17 We will endeavour to update the CCTV pages on the Brent website to ensure residents are aware of our CCTV network and our strategy, and the processes by which deployments are made. Linking the decision making process around CCTV deployment to Community Action Groups will allow for greater transparency and more citizen-led utilisation of CCTV.

Involving Active Citizens

- 12.18 There is great public interest in CCTV in Brent, with demand for CCTV as a response to crime issues high from members of the public and explorations of citizen-run CCTV systems being undertaken by citizen groups. While this is legally challenging to be included within Brent's network, we will seek to build on the enthusiasm for CCTV by instigating an element of volunteer support, whereby residents can undergo training in order to become volunteer CCTV operators, providing additional capacity for paid staff at peak times.

Future Options

- 12.19 Throughout the duration of this strategy we will explore the opportunity to share the CCTV service with another borough or another provider. The London Boroughs of Enfield and Harrow have an agreement to use a single control room at Edmonton and this is an option we will explore in the longer term. Similarly Ealing are likely to construct purpose-built accommodation for their CCTV and out-of-hours service and this may also provide an opportunity for Brent to share services.
- 12.20 Bringing services together in this fashion requires a capital investment which is not available at the present time, but a clear agreement of the possibilities open to us would enable a bid for capital expenditure to be made. Sharing services would create efficiencies and provide an opportunity for significant savings, as well as potentially freeing up space within the Civic Centre.

13 Vehicle-mounted CCTV

- 13.1 The Public Realm Service also deploys CCTV to counter fly-tipping and other environmental crimes. The service deploys four CCTV cars to undertake patrols and static surveillance of fly-tip hotspots. These cars are marked so offer the additional advantage of creating a visible deterrent at these sites and as they move around the borough.
- 13.2 The service also uses covert (hidden camera) and overt (Brent Control Room) CCTV surveillance operations to support their work to identify and prosecute those guilty of fly-tipping.

14 CCTV enforcement – parking

- 14.1 CCTV was used to enforce parking, bus lane and moving traffic restrictions in Brent, and supplemented the traditional method of enforcement by CEOs. Footage captured by fixed cameras was used to issue PCNs in locations where CEOs had previously found it difficult to enforce. Camera enforcement signs were displayed in these areas to alert motorists to active CCTV, and encourage compliance with local restrictions.
- 14.2 Compared to 2013/14, the issuance of PCNs for bus lane contraventions doubled in 2014/15; and moving traffic contraventions increased by 14%. This in part reflects the overcoming initial teething issues caused by moving to a new enforcement suite in Brent Civic Centre in July 2013; and the introduction of efficient unattended camera systems. Unattended camera systems ensure that enforcement is concentrated on a specific restriction for the duration of the camera's operational hours. This means that the Council are now able to apply a zero tolerance enforcement regime to bring about compliance with bus lane and moving traffic requirements.
- 14.3 CCTV PCN issuance for parking contraventions remained broadly unchanged from the previous year.
- 14.4 The Council continues to use CCTV enforcement for a number of purposes. New operational guidance introduced by central Government in April 2015 has restricted the use of CCTV for enforcing parking (as opposed to moving traffic) offences. These changes mean that in most circumstances a parking PCN may only be issued by fixing it to the offending vehicle or handing it to the person who appears to be in charge of the vehicle.
- 14.5 Since CCTV parking enforcement relies on serving the PCN by post, it may no longer be used except in specified circumstances. These are:
- 14.6 if the CEO has been prevented (for example by force, threats of force, obstruction or violence) from serving the PCN;
- 14.7 if the CEO had started to issue the PCN but did not have enough time to finish or serve it before the vehicle was driven away, and the CEO would otherwise have to write off or cancel the PCN;
- 14.8 Where the contravention has been detected on the basis of evidence from an "approved device".
- 14.9 An "approved device" is a camera and associated recording equipment which has been approved by the Secretary of State for Transport. PCNs for parking contraventions may not be served by post on the basis of evidence from an approved device other than when vehicles are parked on:
- a bus lane;
 - a bus stop clearway or bus stand clearway;
 - a Keep Clear zig-zag area outside schools; or
 - a red route.

- 14.10 Certain contraventions (such as double parking, footway parking and parking in areas where stopping is prohibited) are difficult to enforce by CEOs on foot because the driver often remains close to the car and can move the vehicle if a CEO is seen approaching. Because CCTV may no longer be used to enforce against these contraventions, the Council has increased the level of on-street enforcement by redeploying some CEOs who were previously used to issue camera-based PCNs.

CCTV enforcement - moving traffic contraventions

- 14.11 In order to support the Council's policy of encouraging sustainable form of transport, the Parking service provides stringent enforcement of bus lanes in order to secure faster journey times for bus users.
- 14.12 In addition, the Council has adopted powers available under the the Traffic Management Act 2004 to undertake civil enforcement of a number of moving traffic offences. Yellow Box Junctions, prohibited turns, and no-entry signs are all examples of moving traffic violations actively enforced by the service. Such restrictions are in place to ease congestion on the borough's roads, and improve road safety.
- 14.13 CCTV enforcement is co-ordinated from an enforcement suite in Brent Civic Centre.

Mobile CCTV

- 14.14 The Council has retained the use of mobile CCTV for school Keep Clear markings. During the rest of the day the vehicles are used for enforcement at bus stops and for intelligence gathering.

Growth in unattended cameras

- 14.15 The installation of 10 unattended cameras is a workstream within the One Council Parking programme. £975k worth of savings are expected for 2015/16.
- 14.16 Thirteen cameras have been ordered. Ten of these have been provided through the One Council Parking programme; the other three have been funded from Section 106 agreements at specific locations. Works to progress installation of all 13 cameras are being managed as a single project. Details of the installation progress of these cameras – and their purposes – can be found below.

Location:			Power	Camera Install		Signage	Go Live		
Location:	Junction With:	Contravention:	Power install complete?	Camera install complete?	Camera config complete?	Signage Ok?	2 weeks monitoring complete?	Camera live	Go Live date
High Road, Wembley	Lancelot Road	Banned right turn from High Road, Wembley into Lancelot Road	Yes	Yes	No	Yes	Yes	No	
Chamberlayne Road	Bolton Gardens	Banned right turn from Bolton Gardens into Chamberlayne Road	Yes	Yes	No	Yes	Yes	No	
High Street	Wendover Road	Banned Right turn from High Street into Wendover Road	Yes	Yes	Yes	No	Yes	No	
Glacier Way		Mandatory left turn onto Glacier Way	Yes	Yes	Yes	Yes	Yes	Yes	20/07/2015
CHALKHILL ROAD	into Blackbird Hill.	Compulsory Left-turn	Yes	Yes	No	Yes	No	No	
Un-named link road	linking Birse Cres. & Neasden Lane underpass	No Entry except buses	Yes	Yes	Yes	Yes	Yes	Yes	13/08/2015
CHURCH ROAD	High Road, Willesden and Neasden Lane.	Buses and Cycles Only	Yes	Yes	Yes	Yes	No	No	24/08/2015
St Johns Road (Wembley)	into High Street, Wembley (the A404)	Banned Right Turn	No	No	No	Yes	No	No	
Kings Drive	Forty Lane	Banned right turn	Yes	Yes	No	Yes	Yes	No	
Abbey Road	Twyford Abbey Road	Bus Gate	No	No	No	Yes	No	No	

15 Adherence to CCTV Codes and Standards

- 15.1 CCTV systems are subject to legislation that aims to protect the public's privacy from undue monitoring and surveillance. This includes the Data Protection Act (1998), the Regulation of Investigatory Powers Act (2000) and the Protection of Freedoms Act (2012). It is important for organizations operating CCTV to be compliant with the provisions of these laws to protect themselves from legal action and to uphold the privacy of the residents and businesses that they monitor. To this end, there are three major publications of best practices to guide regulatory compliance:
- 15.2 The Home Office **Surveillance Camera Code of Practice** (June 2013) provides guidance on the appropriate use of CCTV per the requirements of the Protection of Freedoms Act (2012). This legislation stipulates that local authorities must have regard to the code in the when operating their CCTV systems.
- 15.3 **In the picture: A data protection code of practice for surveillance cameras and personal information** is published by the Information Commissioner's Office (October 2014) pursuant to the Data Protection Act (1998) and updated to reflect later regulatory developments. This code is consistent with the Home Office code, but has a more significant focus on the protection of personal data. It also has a broader scope than the Home Office code: it must be adhered to by both private and public sector CCTV systems.
- 15.4 **British Standard 7958:2009** (CCTV Management and Operation Code of Practice) is a voluntary standard published by the British Standards Institute—a non-governmental body. It provides guidance based on the provisions of the Data Protection Act (1998), Human Rights Act (1998), and Freedom of Information Act (2000).
- The Surveillance Camera Code of Practice*
- 15.5 This document provides 12 guiding principles against which CCTV authorities should align their operations. These principles emphasise that all CCTV systems must operate towards a "legitimate aim" due to a demonstrable "pressing need". Furthermore, each CCTV operation must be governed by clear rules and regulations that aim to limit privacy impacts while also providing for clear responsibility and accountability for the system. Finally, there is emphasis on the need for regular review of CCTV systems in order to ensure continued compliance with the principles.
- 15.6 Brent's CCTV operations require the actions below to take place to ensure compliance with this code:
- 15.7 Principles 2 and 10 outline the need for annual reviews (including camera-by-camera privacy impact assessments) as well as audit mechanisms to ensure that legal requirements are met. Privacy impact assessments have been undertaken and we are working with the Surveillance Commissioner as he develops a standardised audit.
- 15.8 Principle 3 highlights the importance of transparency for a CCTV system and specifically speaks to the need for a formal complaints process and availability of

system information. The CCTV pages on the Brent website have been rewritten and will be further developed.

- 15.9 Principle 5 covers the area of clear and precise procedural rules to govern the management and operation of the system. A new procedural manual has been written and is in use by operators.

In the Picture

- 15.10 This code is complementary to the Home Office code and is based on the principles of the Data Protection Act (1998). Generally speaking, these principles focus on maintaining the privacy of individuals through the effective management of surveillance systems. Since the ICO code is complementary to the Home Office code, major areas of deficiencies are similar. Other major components for review include:

- The sharing of information with external stakeholders (e.g. MPS, traffic enforcement) requires explicit arrangements regarding the responsibility of each agency with regards to data privacy and security;
- The siting of surveillance cameras such that the amount of space that is not relevant to the purpose of the system is minimised (this can be accomplished through the viewshed analysis described above).
- The security of wireless data transmission (e.g. microwave and 3G) against unwanted interception; and
- The adequacy of obvious signage that:
 - notifies the public that they are under CCTV surveillance; and
 - provides contact information for the control room.

Action Plan

OBJECTIVE	KEY ACTIVITY	PROGRESS MILESTONES	DEADLINE	SUCCESS CRITERIA
We will reduce the number of fixed CCTV cameras, removing those that cannot justify their contribution to community safety	Analyse camera usage of all 183 fixed cameras Prepare list of decommissioning Organise decommissioning and bagging of redundant cameras	Produce "league table" of camera usefulness Agree decommissioning process Inform relevant stakeholders of decommissioning Agree process for physically decommissioning and bagging camera, including contracting provider	April 2016	All cameras deemed to be not contributing to community safety decommissioned
We will increase the number of mobile deployable CCTV cameras, with a clear, transparent system in place for their deployment to areas of need.	Procure 10x 4G mobile cameras Agree deployment prioritisation process	Procurement of additional cameras Cameras deployed in hotspot areas Evaluation criteria agreed and in place	December 2015	New cameras bought and operating in evidence-based hotspot areas
We will seek to gain efficiencies and advantages through better tendering and procurement arrangements, including the replacement of the oldest CCTV cameras	Procure new CCTV maintenance contract Procure new CCTV transmission contract to include replacement of the oldest cameras	New maintenance contract agreed October 2015 New transmission contract agreed April 2016	October 2015 April 2016	Contracts signed
We will develop opportunities to provide a monitoring service for the CCTV cameras of other organisations, including housing providers	Agree contracts for the monitoring of external providers' cameras	Standard offer prepared for housing providers	March 2016	Minimum of two housing providers contracting Brent CR to monitor
We will ensure compliance with the Surveillance Commissioner's CCTV Code of Practice	Develop programme of work to ensure compliance	Action plan established for delivery with oversight group pulled together	April 2016	Adherence to code by April 2016
We will explore opportunities for recruiting and training volunteer CCTV	Agree recruitment and training programme through the volunteering	Process for recruitment and training agreed	October 2016	First volunteer operators staffing shifts by October 2016

operators to complement existing staff	hub			
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Financial Implication

This project is cost neutral to the council as only the savings to be realised from the decommissioning of the 30 CCTV cameras (forecast to be £15-20k) will be invested in the new CCTV mobile technology. Also the maintenance of the new CCTV cameras can be accommodated in the existing maintenance contract and will not impact the 2015-16 Community Safety budget. On Staffing, the planned recruitment and training of volunteer CCTV operator will be done in house at no extra cost.