



Public Space CCTV Policy

Policy summary:	<i>The policy accompanies Dyfed-Powys Police operating guidance for the use of Public Space Close Circuit Television (CCTV) within Dyfed-Powys Police</i>			
Policy number:	012/2020			
Version control:	Version	Date	Author	Rationale
	v1.0	13.06.2019	Marie McAvoy	Final Version
	v1.1	25.03.2020	Sian Jones	Annual Review
	v1.2	18.05.2020	Sian Jones	Amendments
	v1.3	08.06.2020	Marie McAvoy	Review / Amend
	v1.4	12.04.2021	Marie McAvoy	Review and update
	v2.0	08.07.2021	Marie McAvoy	Final review. Comments Gwen James
Date implemented:	13.06.2019			
Review date:	<p>13.06.2023</p> <p><i>Policies will be reviewed initially after 12 months has elapsed and then will be subject to a biennial review (however the policy owner may undertake a review sooner if for example there are major changes to legislation associated with the policy, major changes to process etc).</i></p> <p><i>It may also be subject to amendment or revision as a result of changes to legislation; developments in technology or equipment as may occur from time to time.</i></p>			
Owner/contact: (approved by Board)	Superintendent, Specialist Operations			



Consultation and approval	<i>The policy will be owned by the Superintendent, Specialist Operations</i>		
Welsh Translation	Yes	X	No

1. Statement of Policy

Closed-Circuit Television (CCTV) is technology which provides an effective means of identifying people, vehicles or incidents that may result in action being required by the Police or partner organisations.

Dyfed-Powys Police have implemented a Public Space CCTV system in 24 towns across the force area consisting of over 155 cameras.

It is a proactive policing tool for response policing and investigations, which can prevent criminality by targeting criminals and areas which are subject to higher levels of crime.

CCTV technology will be used within Dyfed-Powys Police to help detect, deter and disrupt criminal activity at local, regional and national level, including tackling travelling criminals, Organised Crime Groups and terrorists.

Dyfed-Powys Police will use the CCTV system to assist operational officers and staff in gathering evidence in the investigation of crime and to provide public reassurance. The CCTV cameras will be monitored by dedicated staff and all officers and operational staff will have the ability to access CCTV images as required and in line with their roles and responsibilities.

The purpose of this policy is to identify the procedures and protocols required for the application, deployment and use of CCTV cameras by police officers/staff, taking into consideration national guidelines and legislation. This policy will outline and achieve the following:

- Provide clear and unambiguous information on the use of CCTV viewing and recording equipment.
- Provide a framework of instructions for the use, retention and analysis of CCTV recording.

OFFICIAL



- Meet the requirements of the Data Protection Act 2018
- Meet the requirements of UK General Data Protection Regulation (UK GDPR).
- Meet the requirements of the Health and Safety at Work Act 1974.
- Promote a safer working environment for staff and any other individual who may come into contact with the CCTV recording system.
- Meet the requirements of the Surveillance Camera Commissioner's Codes of Practice and guiding principles.
- Effectively use CCTV system to obtain the best value from this asset.
- Bring more offenders to justice through producing quality CCTV evidence.

The policy and associated guidance establishes the legal basis and guidance for the use of Dyfed-Powys Police Public Space CCTV



2. Policy Scope

This policy and associated guidance, namely the CCTV Operating Procedure, is intended to enable officers to comply with legislation and guidance to capture evidence for use in court proceedings and in the investigation and detection of crime.

Overarching principles for the operational use of CCTV:

Public Space CCTV has an essential role to play in keeping people safe, whilst at the same time people need to be confident that their right to privacy remains.

CCTV cameras will:

- conform to industry standards
- be situated in locations where it is justifiably most needed and will most benefit the public interest
- be lawfully and transparently operated by competent individuals with the privacy of the individual citizen at the heart of system and procedural decisions
- be used overtly and should not be used covertly except in exceptional circumstances and where the necessary authorities have been granted
- provide real time information about ongoing incidents
- assist in reducing crime and disorder
- assist with missing person enquiries
- assist the conducting of investigations
- provide intelligence
- reduce the fear of crime and help communities feel safer
- increase public perception of safety
- increase guilty pleas of offenders and bring offenders to justice
- ensure users are able to justify their use of the system and have a legal and objective basis for taking the footage. This must be proportionate to the incident/activity in question.



3. Powers and Policy/Legal Requirements

This CCTV system will be owned and funded by Dyfed-Powys Police.

System ownership will lie with the force Operations Department with the Superintendent in charge of Specialist Operations being the designated Senior Responsible Owner (SRO).

A Single Point of Contact, namely the CCTV Co-Ordinator, is the formal designation at a more tactical level and will be the recognised expert source of advice and a co-ordinator of all **overt** surveillance camera activity and capability within the organisation. The CCTV Co-Ordinator will also have first line management responsibility for the CCTV Operators.

The Chief Constable will act as the Data Controller for CCTV images recorded and stored on police systems.

The system has been installed, operated and managed in accordance with The Surveillance Camera Code of Practice and the SRO will hold responsibility for demonstrating the integrity of processes and for having regard to the Surveillance Camera Commissioner's Code of Practice. This enables the Force to demonstrate to communities that we are operating best practices which are transparent and proportionate.

CCTV images are retained for a period of 31 days following which they are auto-deleted day-on-day, unless downloaded for evidential purposes whereby images are retained in line with the Managements of Police Information.

An Operating Procedure has been produced outlining and defining the operational use of the CCTV system to ensure compliance with the appropriate legislation, Code of Practice and force policies.

The system has the support of the respective County Councils, Town Councils, Welsh Government and Trunk Road Agencies. Memorandums of Understanding have been agreed with the relevant parties outlining specific roles and responsibilities.



EQUALITY IMPACT ASSESSMENT

Section 4 of the Equality Act 2010 sets out the **protected characteristics** that qualify for protection under the Act as follows: Age; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; Sexual Orientation.

The **public sector equality duty** places a proactive legal requirement on public bodies to have regard, in the exercise of their functions, to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is unlawful under the Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The equality duty applies to all protected characteristics with the exception of Marriage and Civil Partnership, to which only the duty to have regard to the need to eliminate discrimination applies.

Carrying out an **Equality Impact Assessment** involves systematically assessing the likely or actual effects of policies on people in respect of all the protected characteristics set out above.

An Equality Impact Assessment should be carried out on any policy that is **relevant** to the public sector equality duty.

An Equality Impact Assessment has been completed for the Public Space CCTV Project.

Equality Impact Assessment Completed	
Name:	Marie McAvoy
Department:	ICT Business Change
Signed:	<i>Marie McAvoy</i>
Date:	26.05.2019

OFFICIAL



HUMAN RIGHTS ACT

CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Human Rights Act and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Act and the principles underpinning it.

Name:	R Jones
Department:	Legal Services
Signed:	R Jones
Date:	04.07.2021

OFFICIAL



4. Options and Contingencies

A Crime Pattern Analysis including crime data, anti-social behaviour and hate crime incidents, and calls for service, along with local policing knowledge informs decision making in relation to camera locations.

The CCTV Project Team for the duration of project delivery will undertake annual reviews of camera locations until such time as the project is closed, at which point overall responsibility will sit with the Superintendent in charge of Specialist Operations being the designated Senior Responsible Owner (SRO).

Privacy Impact Assessments will be completed for all camera locations and published on the Dyfed-Powys Police website.

In line with the Surveillance Camera Commissioner's Code of Practice all camera sites will be reviewed annually and updated Privacy Impact Assessments issued as required. Where a decision is made to remove and/or relocate a camera site a new Privacy Impact Assessment will be issued/updated as necessary.

As a minimum, annual reviews of camera sites will include a review of the privacy masks applied to each camera to ensure that windows and/or doors of any private dwellings are appropriately masked to minimise intrusion.

The Project Team will be the key contact in relation to queries users have regarding the use of HikCentral for the duration of the project. Thereafter the CCTV Co-Ordinator will be responsible for providing operational users with assistance on the use of the system.

The CCTV Co-Ordinator will be responsible for undertaking monthly ad-hoc audit reviews and providing management information as required and as outlined in the Performance Framework

The CCTV system will be monitored by a dedicated team of CCTV Operators based in the Force Communication Centre (FCC) at Police Headquarters where access is restricted and only permitted for authorised personnel. All CCTV images will be recorded 24 hours a day, 365 days a year and will also be viewable locally.

Any breach of the CCTV Policy or misuse of the CCTV system by Dyfed-Powys Police staff or other authorised users will initially be investigated by the CCTV Co-Ordinator in order to assess and ascertain if a breach has occurred. Any serious breach of the

OFFICIAL



CCTV Policy or misuse of the system will be immediately investigated and an independent investigation by the Professional Standard Department (PSD) undertaken to make recommendations on how the breach should be remedied.

The CCTV Operators, under the supervision of the CCTV Co-Ordinator, are responsible for raising all faults with the cameras or related equipment with the Contractor.

All operational police officers and investigative police staff will have access to the HikCentral system, which is managed for new staff/transferees via the electronic System Access process.

Baydale Control Systems Ltd are responsible for annual maintenance of cameras and for producing the required documentation.

Users must be in a position to justify their use of the system, which must relate to a policing purpose, in line with the Data Protection Act 2018 and Computer Misuse Act 1990.

Users are responsible for the sharing of footage with the CPS as required.

This policy has been drafted in accordance with the relevant principles that underpin the Code of Ethics

CODE OF ETHICS

CERTIFICATE OF COMPLIANCE

This policy has been drafted in accordance with the Code of Ethics and has been reviewed on the basis of its content and the supporting evidence and it is deemed compliant with that Code and the principles underpinning it.

Name:	Marie McAvoy
Department:	ICT Business Change
Signed:	<i>Marie McAvoy</i>
Date:	08.07.2021



5. Take action and review

The policy will be applied alongside an Operating Procedure outlining the intended purpose and use of the Public Space CCTV system and associated software.

Compliance of the policy and related Operating procedure will be monitored through:

- System administrators reviewing all system access requests
- System access controlled through System Administrators
- Ad-hoc audit checks
- Preparation of monthly / quarterly / annual statistical and usage reports

Application of the policy and the Surveillance Camera Commissioner's Code of Practice is re-enforced through the publication of the Privacy Impact Assessments on the force website.

A CCTV page on the force Intranet site exists and provides officers / staff with information in relation to the use and functionality of the system, as well as all camera locations.

During project delivery stage all reporting is undertaken via the CCTV Project Group, chaired by the Chief Superintendent, Governance and Change. Following project closure all Public Space CCTV reporting will be as approved by the Superintendent, Specialist Operations.

Freedom of Information Act 2000

Section 19 of the Freedom of Information Act 2000 places a requirement upon the Force to publish all policies on the Force website. Policies are why we do things and procedures are how we do them. A case-by-case review of procedures must be undertaken to protect law enforcement and health and safety considerations. Where a combined policy and procedure document is being produced the Force is legally required to publish the policy section and assess the procedure part to ensure no sensitive information is published. Generally the default position shall be that a policy and accompanying procedure document will be produced separately.

There is a requirement therefore to review this document to establish its suitability for publication. Please identify below whether the document is suitable for publication in

OFFICIAL



Heddlu Police
DYFED-POWYS

its entirety or not. Where it is believed that disclosure will be harmful please articulate the harm that publication would cause and highlight the relevant sections within the document. Where it is perceived that there is harm in disclosure the document should be forwarded to the Disclosure Unit for review.

Suitability for publication

Suitability for publication	Yes/No	Date	Signature
Document is suitable for publication in its entirety	No	08.07.2021	<i>Marie McAvoy</i>
Document is suitable for publication in part, I have identified those sections which I believe are not suitable for disclosure and have articulated below the harm which would be caused by publication.			
Harm – in publication			

FOI review – to be completed by Disclosure Unit

(Only required if author believes there is any harm in disclosure)

Suitability for publication	Yes/No	Date	FOI Decision Maker
Document is suitable for publication in its entirety			

OFFICIAL



Heddlu Police
DYFED-POWYS

Document is suitable for disclosure in part and relevant redactions have been applied. A public facing version has been created.			
Once review has been undertaken FOI Disclosure Officer to return document to policy author and following sign-off document to be published within Force Publication Scheme. Any future changes to the document should be brought to the attention of the Disclosure Unit, as appropriate.			