

Supplementary Information

**HAVANT BOROUGH COUNCIL
CABINET
WEDNESDAY, 15TH MARCH, 2023**

Please note that the attached supplementary information was unavailable when the agenda was printed.

Agenda No Item

8 Adoption of a CCTV Policy

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NON-EXEMPT

HAVANT BOROUGH COUNCIL

CABINET

15th March 2023

Adoption of Closed Circuit Television (CCTV) Policy and approval of equipment spend

FOR DECISION

Portfolio Holder:

Key Decision: Yes

Report Number: *HBC/123/2023*

1. Purpose

- 1.1. Havant Borough Council (the Council) has in place Closed-Circuit Television (CCTV) and other surveillance systems. This policy details the purpose, use, and management of the systems, and details the procedures to be followed in order to ensure that the Council complies with relevant legislation and Codes of Practice where necessary.
- 1.2. This paper is submitted to Cabinet for adoption of the CCTV Policy.

2. Recommendation

- 2.1. Cabinet are asked to:
 - a. approve the Council CCTV policy; and
 - b. request that officers review the policy on an annual basis.
 - c. approve the expenditure of £25,400 UKSPF funding on Waterlooville CCTV

3. Executive Summary

- 3.1. The Council ceased the funding and therefore effectively the use of public space CCTV in 2016. Subsequent scrutiny of the budgetary decision asked that the subject be revisited through the regeneration process and as and when there was an identified need to tackle crime and anti-social behaviour.

- 3.2. Business communities in Waterlooville and Havant Town Centre have reported increasing level of retail crime and targeted anti-social behaviour linked to professional shoplifters and groups of youths. Therefore, the use of CCTV has been revisited and identified as an appropriate vehicle to be included in the suite of activity being undertaken to address this behaviour.
- 3.3. Predominantly the Council will use CCTV for the purposes of reducing and detecting crime and anti-social behaviour as well as ensuring the health and safety of the public and its staff.
- 3.4. The policy has been prepared to take account of:
- a. Surveillance Camera Code of Practice and associated guidance from the Information Commissioner.
 - b. CCTV Code of Practice issued by the Information Commissioners Office (ICO)
 - c. The following documents issued by the Home Office in October 2016.
 - Technical guidance for body worn video devices
 - Safeguarding body worn video data
 - d. Requirements for processing personal data as set out in the UK General Data Protection Regulation (UKGDPR) and Data Protection Act 2018
 - e. Right to privacy as set out in Article 8 of the Human Rights Act 1998
 - f. Regulation of Investigatory Powers Act 2000 (RIPA) and
 - g. Crime and Disorder Act 1998
- 3.5. The Human Rights Act 1998 requires the Council, and organisations working on its behalf, pursuant to Article 8 of the European Convention, to respect the private and family life of a citizen, his home and his correspondence. The European Convention did not, however, make this an absolute right, but a qualified right. Accordingly, in certain circumstances, the Council may interfere in the citizen's right mentioned above, if such interference is;
- a. in accordance with the law
 - b. necessary; and
 - c. proportionate.
- 3.6. The Council will seek to minimise the use of CCTV and will use less intrusive methods of obtaining the required outcome wherever possible.
- 3.7. Each proposed deployment will be preceded by a Data Protection Impact Assessment.

4. Additional Budgetary Implications

- 4.1. There will be an initial capital cost in the region of £25,400 to purchase four redeployable CCTV cameras which it is proposed will be met from United Kingdom Shared Prosperity Fund (UKSPF) and the Business Case for this expenditure is attached at Appendix B for Members' consideration and approval

5. Background and relationship to Corporate Strategy, Climate & Environment Strategy and/or Business Plans

- 5.1. The 2022-2026 Corporate Strategy outlined a political imperative to:
- a. Design and implement a new preventative enforcement approach focusing on triage to improve the quality of place across the borough and address long standing issues and where necessary consider CCTV installation to improve safety.
 - b. To work closely with partners to drive improvements in our areas relating to communities, safety and place; and
 - c. To look to enable and deliver safety initiatives and preventative mechanisms so our communities feel safe.

6. Options considered

- 6.1. It is a requirement to have a CCTV policy in place if the Council proceeds with increasing the CCTV coverage in the borough.
- 6.2. Police research of reported incidents in Waterlooville Town Centre has identified in excess of one hundred incidents in the area over the past six months including 48 public order matters, 22 incidents of shoplifting, 12 incidents of theft person, 4 incidents of criminal damage including 1 of arson. The police have faced evidential difficulties experienced due to the lack of direct evidence of those responsible and have requested CCTV coverage of the area.
- 6.3. The area has been designated a partnership priority area and discussed at monthly multiagency meetings to raise awareness and to enable agencies to focus their resources towards solving the problems faced. Property owners have reinforced the access points to premises.
- 6.4. Police have taken measures to disperse the groups responsible for the anti-social behaviour through additional uniform enforcement patrols including the use of CCTV drones and exclusion notices.

- 6.5. The Council have commissioned youth outreach services to engage with groups on several nights per week. To date some 200 individuals have been spoken to regarding their behaviour and the risks involved.

It is therefore viewed at present that a CCTV policy would give the Council options to further enhance preventative measures to tackle anti-social and criminal behaviour in our town centres. The alternative is to carry on as present which is unlikely to see significant changes in behaviour.

7. Resource Implications

Section 151 Officer comments

Date: 10th March 2023

The Council received grant funding in December from the UK Shared Prosperity Fund, and this was included within the Capital programme approved at Full Council in February 2023 as part of the Budget. This will be used to fund the initial capital expenditure up to £25,000. The remaining £400 will be met from Cash limited resources.

The initial investment will also meet the first two years maintenance for this equipment. There is no existing cash limited budget for this maintenance going forward so an alternative source of funding will need to be sought following this initial period.

- 7.1. *Financial Implications* – funding can be found from existing budgets and external funding for the capital investment.
- 7.2. *Human Resources Implications* - In re-setting the 2022/23 revenue budget, relevant allocations were made across all service areas to ensure that staffing budget provision matched with proposed and approved organisational structures.
- 7.3. *Information Governance Implications* - the policy document contains clear guidance on how authorisation records and surveillance products will be managed with clear timeframes and identified responsible owners. Each proposed deployment will be preceded by a Data Protection Impact Assessment.
- 7.4. *Other resource implications* – none

8. Legal Implications

- 8.1. The Council must follow the requirements for processing personal data as set out in the UK General Data Protection Regulation (UKGDPR) and Regulation of Investigatory Powers Act 2000 (RIPA) and Crime and Disorder Act 1998 The Data Protection Act 2018, and an individual's right to privacy as set out in Article 8 of the Human Rights Act 1998.

Monitoring Officer comments

Date: 9th March 2023

The Council needs to ensure that it has robust mechanisms in place in order to appropriately coordinate CCTV activity in the Borough, using available resources.

CCTV is an area that is specifically referenced in the Budget and Policy Framework recently adopted by Council and adoption of a tailored policy will be within the competence of Cabinet.

Adopting a CCTV Policy will provide that CCTV will be operated fairly, within the law and only for the purposes for which it was established.

9. Risks

- 9.1. The use of CCTV surveillance is recognised as having a high risk in relation to an individual's human rights. As such each proposed deployment will be the subject to a full data protection impact assessment (DPIA) which will ensure that risks are identified, and mitigation measures put in place.

10. Climate & Environment Implications

- 10.1. None.

11. Consultation

- 11.1. The draft policy has been shared with the Data Protection Officer, Governance Manager, Digital Manager and Senior Information Risk Owner. In addition, the draft policy has been shared with relevant Cabinet leads.

12. Communication

12.1. The CCTV policy will be placed on our website.

12.2 The deployment of each CCTV camera will be covered by signage either attached to the column or as near to the camera as is practicable indicating where the camera is and including contact details for the Council

13. Appendices

Appendix A – CCTV Policy

Appendix B – Business Case

14. Background papers

None

Agreed and signed off by:

Portfolio Holder: Cllr Robinson 10/03/2023

Executive Head: Claire Hughes 10/03/2023

Monitoring Officer: Mark Watkins, Chief Legal Officer 09/03/2023

Deputy Section 151 Officer: Wayne Layton, Chief Finance Officer 09/03/2023

Appendix A

CCTV and Surveillance Camera Policy

Policy Details

Author	Tim Pointer, Enforcement Manager
Effective Date	April 2023
Review Date	April 2024
Version	V06

Version Number	Date	Author / Reviewer	Comments / Changes
V0.1	23.01.23	Tim Pointer	First Draft
V0.2	01.02.23	Cheryl Lincoln	Comments from Data Protection Officer
V0.3	20.02.23	Will Jackson	Comments from Governance Manager
V0.4	20.02.23	Tim Pointer	Second Draft

VO.4	22.02.23	MT (TP)	Third draft
VO.5	22.2.23	Mark Watkins	Comments of 151 officer
VO.6	28.2.23	Cheryl Lincoln	Comments of Data Protection Officer
Final	09.03.23	Alan Downton	Comments from Corporate Governance Board

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1. Policy Summary

- 1.1. Havant Borough Council (the Council) in their 2022 – 2026 Corporate Strategy outlined a political imperative to design and implement a new preventative enforcement approach focusing on triage to improve the quality of place across the borough and address long standing issues and where necessary consider Closed Circuit Television installation to improve safety and for the prevention and detection of crime, and to assist in the apprehension and/or prosecution of offenders.
- 1.2. The Council has in place Closed-Circuit Television (CCTV) and other surveillance systems. This policy details the purpose, use, and management of the systems, and details the procedures to be followed in order to ensure that the Council complies with relevant legislation and Codes of Practice where necessary.
- 1.3. This policy and the procedures therein detailed, applies to all of the Council's CCTV and surveillance systems, including overt and covert installations capturing images of identifiable individuals for the purpose of viewing, and / or recording the activities of such individuals.
- 1.4. CCTV and surveillance system images are monitored and recorded in strict accordance with this policy.

2. Introduction

- 2.1. The Council uses CCTV and surveillance system images for the prevention and detection of crime, public safety, to monitor the Council's buildings in order to provide a safe and secure environment for staff, volunteers, contractors, and visitors, and to prevent the loss of or damage to the Council's contents and property.
- 2.2. The CCTV and surveillance systems are owned by the Council and managed by the Council and / or its appointed agents. The Council is the system operator, and data controller, for the images produced by the CCTV and surveillance systems, and is registered with the Information Commissioner's Office, Registration number Z5747526.
- 2.3. This policy applies to CCTV and other surveillance camera devices that view or record individuals.

2.4. This policy uses the terms 'surveillance system(s)', 'CCTV' and 'information' throughout for ease of reference, and would include (but is not limited to) the following types of systems:

- 2.4.1. Fixed CCTV (networked)
- 2.4.2. Body Worn Video
- 2.4.3. Unmanned aerial systems (drones)
- 2.4.4. Stand-alone cameras
- 2.4.5. Redeployable CCTV

3. Purpose

3.1. This Policy governs the installation and operation of all CCTV and surveillance systems at the Council.

3.2. CCTV surveillance is used to monitor and collect visual images for the purposes of:

- a) To help reduce the fear of crime to provide a safe and secure environment for residents of, and visitors to, the areas covered by the scheme.
- b) To help deter and detect crime and provide evidential material for court proceedings.
- c) To assist in the overall management of the Council.
- d) To assist in the management of other locations and buildings owned or controlled by the Council.
- e) To enhance community safety, including the prevention and detection of harassment, to assist in developing the economic well-being of the Havant Borough and encourage greater use of the town centres.
- f) To assist the local authority in their enforcement and regulatory functions within the Havant Borough.
- g) To assist in supporting civil proceedings.
- h) To assist the Council in discharging its health and safety obligations towards staff
- i) To investigate allegations of staff misconduct

4. Scope

4.1. This policy applies to all CCTV and related surveillance systems operated by the Council.

4.2. Where a system is jointly owned or jointly operated, the governance and accountability arrangements are agreed between the partners and documented so that each of the partner organisations has clear responsibilities, with clarity over obligations and expectations and procedures for the resolution of any differences between the parties or changes of circumstance.

- 4.3. This policy is applicable to, and must be followed by, all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers and Council Members.
- 4.4. All staff involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 4.5. All systems users with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will have relevant skills and training on the operational, technical and privacy considerations, and fully understand the policies and procedures.

5. Policy Statement

- 5.1. The Council will, subject to 5.5b below operate its CCTV systems in a manner that is consistent with respect for the individual's privacy.
- 5.2. The Council complies with the Information Commissioner's Office (ICO) CCTV Code of Practice and the Surveillance Camera Commissioner's Surveillance Code of Practice to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
- 5.3. The CCTV systems will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
- 5.4. The use of the CCTV systems will be conducted in a professional, ethical, and legal manner, and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.
- 5.5. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
- a. cover the specific area to be monitored only;
 - b. keep privacy intrusion to a minimum;
 - c. ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
 - d. minimise risk of damage or theft
- 5.6 Before any CCTV system is installed, service areas will consider other, less intrusive methods to achieve the objectives of having a CCTV system in place (e.g. improving lighting in an area to prevent crime).

6. Location and signage

- 6.1. Cameras are sited to ensure that they cover the relevant areas as far as is possible. Cameras are installed throughout the site/s including roadways, car parks, buildings, premises, within buildings and vehicles, and externally in public facing areas.
- 6.2. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the relevant area, which may include outdoor public spaces.
- 6.3. Signs are placed wherever CCTV systems are in operation, in order to inform individuals that CCTV is in operation.
- 6.4. The signage indicates that monitoring and recording is taking place, for what purposes, who the system owner is (if it is not obvious), and where complaints / questions about the systems should be directed.

7. Monitoring and Recording

- 7.1. Cameras are monitored in a secure private offices and locations.
- 7.2. System administrators can view and access footage for the purposes for which the CCTV system is in operation. Before any further disclosure is made (e.g. to an external organisation, or another internal department / member of staff), written consent should be sought from the Data Protection Officer.
- 7.3. Images are recorded on secure servers (ideally standalone systems, not connected to the network) and are viewable by the system administrators. Additional staff may be authorised by the system administrator to access images from cameras sited within their own areas of responsibility.
- 7.4. Any staff who has access to the system are made aware of their roles and responsibilities relating to the system by the system administrator, who will also provide them with the necessary skills and knowledge to use and manage the system.
- 7.5. Staff who have access to the system will receive continued training as needed, to ensure their competence relating to relevant operational, technical, privacy considerations, policies and procedures.

- 7.6. Where service areas are using Cloud-based storage, they will ensure that such storage is located in the UK or European Economic Area (EEA), and that all relevant security and data protection measures are in place.
- 7.7. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.
- 7.8. Viewing monitors should be password protected and switched off / lock when not in use to prevent unauthorised use or viewing.
- 7.9. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose, and that the date and time stamp recorded on the images is accurate.

8. Covert Surveillance

- 8.1. Covert surveillance is the use of hidden cameras or equipment to observe and / or record the activities of a subject which is carried out without their knowledge.
- 8.2. The use of covert cameras or recording / monitoring will be restricted to rare occasions, in accordance with the Council's [RIPA Corporate Surveillance Policy](#)

9. Data Protection Impact Assessments

- 9.1 In its administration of its CCTV systems, the Council complies with the General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and in accordance with its own [Data Protection Policy](#)
- 9.2 The Council's CCTV systems (new and existing) are subject to a Data Protection Impact Assessment (DPIA), identifying risks related to the installation and use of the system, ensuring full compliance with the data protection principles. This will include consultation with relevant internal and external stakeholders.
- 9.2 Once systems are operational, system administrators will conduct regular reviews of the DPIA for their system.

10. Subject Access Requests

- 10.1 Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Data Protection Officer at dp@havant.gov.uk. Further details of this process are detailed on [the Council's](#)

[website](#). Also on this webpage is a Guide to subject access rights detailing all your subject access rights.

10.2 In order to locate the images on the system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

10.3 Where the Council is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

10.3 A search request should specify reasonable accuracy i.e. within 30 minutes.

10.5 A request for images made by a third party should be made to the Data Protection Officer at dp@havant.gov.uk. Further details of this process are detailed are on [the Council's website](#)

11. Third Party Disclosures

11.1 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

11.2 Such disclosures will be made at the discretion of the system administrator, with reference to relevant legislation, and following advice from the Data Protection Officer.

11.3 Before disclosing any footage, consideration should be given to whether (if possible) images of third parties should be obscured to prevent unnecessary disclosure.

11.4 Where information is disclosed, the disclosing officer must ensure information is transferred securely, and the following instructions on the use of the images given to the recipient:

“Once Havant Borough Council has disclosed this footage to you, you become the data controller for the copy held by you. It is your responsibility to comply with data protection legislation in relation to any further disclosures or processing. Representations from Havant Borough Council should be sought before further disclosure is made”

12. Retention

- 12.1 Unless required for evidentiary purposes, the investigation of an offence, or as required by law, CCTV images will be retained for no longer than 31 calendar days from the date of recording (or for certain systems, until storage limitations require that footage needs to be overwritten). Images will be automatically overwritten or destroyed after this time.
- 12.2 Any footage downloaded and retained for evidential purposes must be reviewed after three months by the system administrator, and either a destruction date or review date must be set, with written justification for further retention recorded.
- 12.3 CCTV disclosure logs should be kept for 6 years.

13. Complaints Procedure

- 13.1 Complaints concerning the Council's use of its CCTV systems or the disclosure of CCTV images should be made in the first instance to the service area controlling the system. The contact details should be found on the signage for the relevant system.
- 13.2 For complaints where contact details can't be identified, these should be made to the Council's Data Protection Officer (dp@havant.gov.uk).
- 13.3 Depending on the nature of the complaint, it will either be processed under the Council's Corporate Complaints process, or (more likely) treated as a data protection concern to be investigated by the Council's Data Protection Officer.

14. Management

- 14.1 Policy is reviewed annually and approved by Cabinet. The Council's Information Governance Steering Group has oversight of this policy, and the Council's Senior Information Risk Owner has been identified as its CCTV Senior Responsible Officer for Surveillance Systems (SRO). The
- 14.2 The SRO has strategic responsibility for the integrity and efficacy of the processes in place within the Council that ensure compliance with the Protection of Freedoms Act 2012, and in respect of all surveillance camera systems operated by the Council.
- 14.3 The SRO is supported by a single point of contact (SPOC) an officer who administer the CCTV systems at an operational level. The SRO and the SPOC will work together to ensure this policy is implemented across

- 14.4 The SPOC will monitor implementation and compliance with this policy for the systems they administer. Users found in breach of this policy may be subject to disciplinary action.

15. Appendix 1 – Type of CCTV

The following types of CCTV are used by the council:

1) CCTV Cameras on the council's Civic Officers:

The use of CCTV cameras on the council's campus is currently restricted to the following areas:

- Public Service Plaza entrances, exits and public areas

2) Body Worn Video Cameras (BWV):

BWV cameras are currently used by Civil Enforcement Officers. Such use is intended for the safety of staff and the public as well as the reduction and detection of crime and anti-social behaviour and images may be used in evidence. Footage from these cameras may also be used for staff training and investigating complaints where necessary.

3) Covert CCTV monitoring:

Any use of covert CCTV monitoring will be undertaken in accordance with the requirements set out in the Regulation of Investigatory Powers Act 2000 (RIPA). RIPA requires that due consideration is given to the proportionality and necessity of any covert activity and that regard is given to the rights of individuals under Article 8 of the Human Rights Act (the right to privacy).

4) CCTV Meridian Centre and Bus Station:

There are CCTV cameras on the exits of the Meridian Centre out to the Bus Station for the purposes of reducing and detecting crime and anti-social behaviour as well as the safety of staff and visitors.

5) Remotely Operated Vehicles (Drones):

The council uses drones to gather information for flood maps and flood risk situations, emergency response, severe weather, roads and infrastructure development. The Drones are operated by the Coastal Partnership.

The Council is further considering the use of CCTV in its town centres, in particular specific locations in Waterlooville Town Centre and it is further investigating redeploy-able cameras, which will be located through the borough for specific activities it wishes to prevent. e.g. fly tipping.

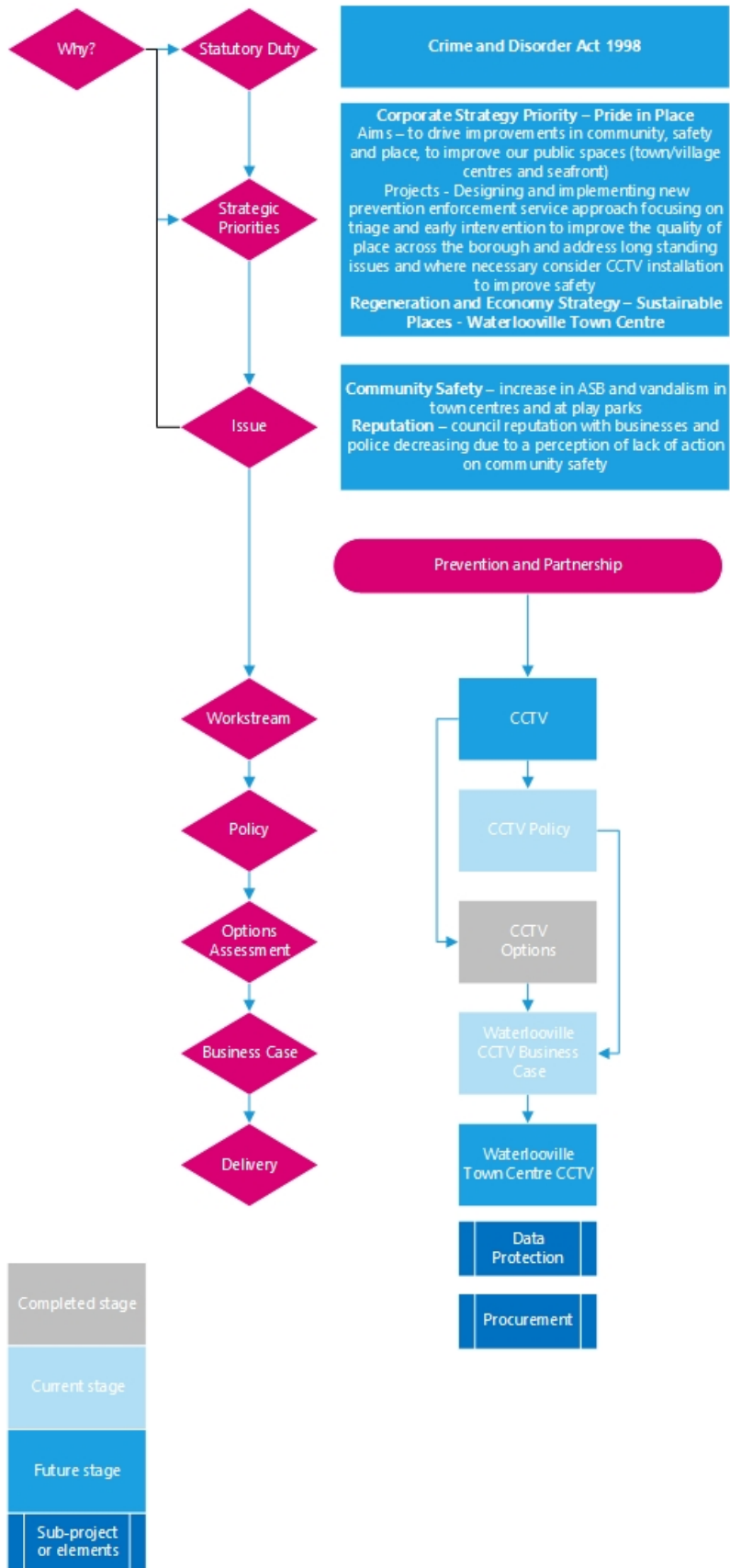
Any future additions to CCTV will be added to the appendix as and when and will operate in accordance with this policy.

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Appendix B

Business Case Waterlooville Town Centre CCTV

09 March 2023



Introduction

This business case is intended to allow approval for the procurement and installation of CCTV cameras in WaterlooVille Town Centre. It notes the budgetary provision, procurement process and plans for ongoing provision/monitoring.

Context

An increase in vandalism, shoplifting and anti-social behaviour has been observed in town centres as well as some play parks. Engagement with retailers and the police highlighted that crimes aren't being reported as retailers felt the police wouldn't respond and as a result there was no evidence to back up claims that more policing is required.

An options assessment for was presented to Management Team and Cabinet Briefing in December 2022 that looked at the advantages and disadvantages of three types of CCTV as well as continuing support of the Action Partnership Youth Intervention programme and two options for increasing town centre security.

It was agreed to proceed with CCTV as a deterrent for antisocial behaviour and to collect evidence to form cases against perpetrators.

A borough-wide CCTV policy is also being developed.

£25,000 of UKSPF has been secured to make short-term improvements to WaterlooVille Town Centre for the year 2022/23. Engagement with residents for the Local Plan identified antisocial behaviour as one of the key problem areas in the town.

Proposal

The proposed course of action is to install redeployable cameras that can be attached to existing posts in the town centre. The posts were used for previous CCTV provision and have an existing power supply. Footage will be streamed back to officers at the Plaza and stored securely to be reviewed if the Police require evidence for an investigation.

It is proposed that the equipment and ongoing maintenance of the cameras should be procured from RedVision who provided the previous service. A procurement exemption will be needed to proceed with a single quote.

Costs

Element	One Off Costs (22/23)	Recurrent, per annum
Purchase and installation of Cameras 4@£6000	£24,000	
SSE charge to reconnect power 4@£300	£1,200	Nominal unmetered supply
Maintenance	Included	
Signage	£200	
TOTAL	£25,400	

Other Implications

- The costs cover 2 years of provision, a forward plan will be required to increase this.
- After two years this might not be required but if it is it will be built in to the regen masterplan
- A plan will need to be drawn up for monitoring/reviewing footage

- Data Protection – infringements on rights, storage and viewing of footage and sharing of data are all risks. A Data Protection Impact Assessment will need to be completed.
- Any provision will need to be compliant with the CCTV policy due to be adopted on 15th March.

Benefits

- Increased perception of public safety – a visible deterrent to ASB
- Improved reputation with the public, businesses and public sector partners

Decision

The decision required is:

- Whether to proceed with the proposed solution

Delivery Timescales

The objectives are:

- To procure a CCTV camera system by 31st March 2023
- To have an operational CCTV camera system installed by w/c 1st May 2023
- Review CCTV provision in May 2024

Equality, Diversity and Accessibility Considerations

- None.

Data Protection, and Information Governance, Considerations

A full Data Protection Impact Assessment will need to be completed prior to deployment as the cameras will be collecting personal information and it will be stored in council systems.

Climate Change and Environment Considerations

Increase in energy use from cameras – use of energy efficient low drain models, motion sensors. Reusing existing poles.