



Code of Practice
for Surveillance Camera Systems operated by
Mid Devon District Council

November 2024

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Certificate of Agreement

The content of this Code is approved in respect of CCTV and surveillance systems owned and operated by Mid Devon District Council (MDDC) and as far as possible, will be complied with at all times by all who are involved in the management, operation and use of any MDDC CCTV systems.

Signed for and on behalf of Mid Devon District Council

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2020

Signed for and on behalf of Devon and Cornwall Police

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2020

Signed for and on behalf of _____

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2024

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Signed for and on behalf of Mid Devon District Council

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2020

Signed for and on behalf of Exeter City Council

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2020

Signed for and on behalf of _____

Signature _____ Name _____

Position _____ Dated ____ day of _____ 2024

Definitions and Abbreviations

CCTV Control Room (CR).

A secure facility located within Tiverton where connected CCTV and surveillance equipment systems are managed and operated in the day to day management of public areas. Which accommodates the central switching recording and ancillary equipment for the Tiverton Town Centre CCTV system along with the facility to monitor the system if required. The images are transmitted over BT Fibre Optic cable to the Exeter City Council Public Spaces Surveillance CCTV Control Room at St Stephens House, Exeter where they are monitored both live and proactively and recorded in response to reported incidents or events. There is a formal agreement in place for Exeter City Council to undertake the monitoring of these cameras.

CCTV Operators.

The people responsible for watching, controlling equipment and recording the images produced by Mid Devon District Council (MDDC) SCS.

Responsible Officer (RO)

A Responsible Officer (RO) is appointed at all sites or business areas using surveillance systems. They are responsible for the day-to-day management of the SCS system. The RO should support the SPOC in understanding any changes to their system, whether the system remains fit for purpose and whether a maintenance contract is still in place for the system.

Senior Information Officer (SIO) (as acting Data Protection Officer (DPO)):

A statutory role set out under the Data Protection Act with responsibility for ensuring that organisations are compliant with personal privacy rights. Any resident can report a personal privacy concern about the Council to the SIO.

Senior Responsible Officer (SRO)

The SRO is the Director of Legal, People & Governance and Monitoring Officer and has strategic responsibility for compliance with the Protection of Freedoms Act 2012 (PoFA) in support of the Chief Executive in respect of all relevant surveillance camera systems operated by MDDC. The SRO will ensure that the interests of the council are upheld in accordance with this Code of Practice.

Single Point of Contact (SPOC)

MDDC has appointed an Operations Manager for Corporate Property and Commercial Assets. The role is operational in support of the SRO and DPO for all matters relating to surveillance systems. The SPOC will act as the main contact point for anything related to a surveillance camera system and apply consistent policies and procedures to all systems at an operational level.

Surveillance Camera Systems (SCS)

'SCS' has the meaning given by Section 29(6) of Protection of Freedoms Act 2012 and includes:

1. closed circuit television (CCTV) or automatic number plate recognition (ANPR) systems
2. any other systems for recording or viewing visual images for surveillance purposes
3. any systems for storing, receiving, transmitting, processing or checking the images or information obtained by 1 or 2
4. any other systems associated with, or otherwise connected with 1, 2 or 3

This excludes any camera system used for the enforcement of speeding offences.

Systems Owner

MDDC owns public space SCS and a wide range of other smaller surveillance systems (PSS) operated across council business areas. The MDDC Head of Finance, Property and Climate Resilience undertakes the responsibilities of ownership on behalf of MDDC.

1. Introduction

1.1 Explaining this Code of Practice (Referred to as ‘the LA Code’)

MDDC is required to establish and maintain a Code of Practice which sets out the governance arrangements that all surveillance schemes operated by MDDC must comply with. This ensures the principles, purposes, operation, and management adopted by the main public-space SCS system are mirrored across the whole local authority service delivery operational areas. This MDDC Code of Practice (LA Code) must set out the regulatory framework that each scheme must comply with, the internal assessment process that each scheme must undertake, and the processes required to establish a new surveillance camera scheme or upgrade an existing scheme.

The LA Code explains the surveillance systems used by the Council. It seeks to provide accountability and reassurance to everyone affected using SCS across the MDDC area. It demonstrates that MDDC will comply with the law and ensure peoples’ rights are respected. The LA Code will also outline how the public may access recorded information, make enquiries or complaints.

The SPOC will be responsible for maintaining the LA Code, and providing regular guidance and updates to Responsible Officers to ensure that all SCS continue to be operated in full compliance with the regulatory framework governing its use.

1.2 MDDC use of Surveillance Camera Systems (SCS)

MDDC believes the use of SCS is a necessary and proportionate way of helping with a wide range of issues that affect people in public places, buildings and vehicles for which MDDC has a responsibility. MDDC also values the use of SCS to protect its staff where appropriate. We have considered the nature of the problems to be addressed and that SCS is justified as an effective solution where it is used. We will annually evaluate whether it is necessary and proportionate to continue using it.

1.3 Regulatory Framework

All our SCS will be operated on a lawful basis and fully compliant with the requirements of the UK General Data Protection Regulations (GDPR) and the Data Protection Act (DPA) 2018; known as the ‘data protection laws’. It will also fully regard all laws that impact on surveillance operations:

- The Human Rights Act (HRA) 1998
- The Crime and Disorder Act (CDA) 1998
- Freedom of Information Act (FoIA) 2000
- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act (PoFA) 2012
- Information Commissioners' CCTV Code of Practice
- Surveillance Commissioner's Surveillance Camera Code of Practice

MDDC SCS includes CCTV cameras and body worn video (BWV), video surveillance cameras fitted to MDDC waste, recycling and road sweeper vehicles, and may in the future include automatic number plate recognition (ANPR). These will all comply with the Surveillance Camera Code of Practice issued by the Home Office (Section 29 PoFA) and other relevant legislation listed above.

MDDC recognises surveillance technologies have significant capabilities to intrude upon the right to privacy. If not lawfully, responsibly, and ethically operated, this technology may adversely impact upon the public confidence which MDDC seeks to provide by using it in the first place. People must be satisfied there is robust and accountable management of surveillance in all MDDC operational areas of service delivery.

1.4 The Tiverton Town Centre CCTV System

The **Tiverton Town Centre CCTV System** comprises of 40 cameras (this number may change) installed at various strategic locations throughout the town centre, including streets, parks, public places and car parks.

The cameras offer full colour, pan, tilt and zoom (PTZ) capability, some of which may be automatically switched to compensate for low light conditions.

Images from these cameras are sent to the CCTV CR, which accommodate the central switching recording and ancillary equipment for the PSS CCTV system along with the facility to monitor the system if required. The images are transmitted over BT Fibre Optic cable to the Exeter City Council Control Room at St Stephens House, Exeter where they are monitored both live / proactively and recorded / respectively in response to reported incidents or events.

The cameras / systems included for transmission and monitoring at Exeter City Council include;-

- a) Tiverton Town Centre CCTV System
- b) Tiverton Multi-Storey Car Park, Phoenix Lane

There is a formal agreement in place for Exeter City Council to undertake the monitoring of the **Tiverton Town Centre CCTV System** cameras alongside the Exeter City Council public space surveillance cameras. The Control Room is staffed by competent, qualified and experienced CCTV operators employed by the Exeter City Council.

All material (data) controlled and managed at the Control Room remains the property of MDDC and is processed (data processing) by competent, qualified Exeter City Council staff.

1.5 Other Surveillance Camera Systems operated by the Council

As well as the Tiverton Town Centre CCTV System and Tiverton Multi-Storey Car Park, MDDC is also responsible for SCS installed and operated at other locations or by staff engaged in operational duties throughout the District; these include:

- a) Phoenix House
- b) Old Road Housing Depot
- c) Carlu Waste Depot (Hitchcocks Business Park)
- d) Exe Valley Leisure Centre
- e) Lords Meadow Leisure Centre
- f) Culm Valley Sports Centre

1.6 Stakeholders

MDDC works closely with stakeholders to deliver SCS services. Typically, but not limited to:

- Devon and Cornwall Police
- The Safer Tiverton Partnership
- Exeter City Council

From time-to-time other local stakeholders may be involved in the use of SCS. Details of roles and responsibilities for key personnel responsible for MDDC SCS are shown in **Appendix A** to this Code.

1.7 Applying the LA Code of Practice

The LA Code will underpin oversight and day-to-day practice by all those managing and operating SCS. It will be supported by specific procedures in each operational area. Everyone connected with SCS operated by MDDC will ensure that the principles and purposes outlined in this LA Code are always upheld. A formal agreement is in place with Exeter City Council to undertake the proactive and reactive monitoring of **Tiverton Town Centre CCTV System** in line with this LA Code. A copy of this LA Code will be available at Phoenix House and on our website. If you would like a copy, please contact the SPOC.

2. Purposes of MDDC Surveillance Camera Systems

The main specific and explicit purposes of MDDC SCS across all operational areas are one or more of the following:

- To provide a deterrent to crime and anti-social behaviour
- To assist the prevention and detection of crime and apprehending criminals
- To improve public safety by reducing the perceived fear of crime
- To provide public reassurance and help improve quality of life in Tiverton
- To help secure safer areas and environments for those who live, visit, work, trade in or enjoy leisure pursuits in Tiverton
- To provide building security and a safe working environment for MDDC staff and visitors
- To provide MDDC vehicle fleet management information including the safety of staff and users of MDDC vehicles and assist in managing reported incidents and complaints
- To assist the police, other emergency services and MDDC with efficient management of resources
- To monitor traffic flow and assist in traffic management
- To assist with MDDC regulatory and statutory responsibilities, including revenues and benefits enforcement, civil parking enforcement
- To assist with the gathering and provision of evidence to support criminal and civil proceedings
- Support the management of public and commercial areas which are essential to commercial wellbeing of the community, including identifying bylaw contraventions
- To assist in civil emergencies and countering terrorism
- In appropriate circumstances, assisting the investigation of damage only accidents in MDDC owned car parks

The SRO and SPOC, after consultation with the SIO/DPO, may draw up other explicit purposes for specific deployments based on local concerns. These will be documented in operational and data protection impact assessments to justify deployment, made available as necessary and reviewed periodically.

The use of other surveillance technologies such as ANPR; BWV covert deployments may also have specific purposes applied to each. Where appropriate, these will be highlighted in the respective content in Section 5 of this LA Code.

The use of audio recording with surveillance technologies such as BWV, vehicle management SCS and cameras inside the CR requires greater justification with clear and explicit purpose. Where appropriate, the purposes will be highlighted in the respective content in in this LA Code.

3. Principles for implementing and operating MDDC SCS

Throughout this LA Code it is intended, as far as possible; to balance the need for surveillance as a safety and security measure with the need to safeguard the individual's right to privacy. MDDC expects this to be a paramount consideration for all persons involved with any of its surveillance camera systems.

3.1 All MDDC surveillance operations will always comply with the data protection laws and follow the Information Commissioner's current CCTV Code of Practice for surveillance systems and subsequent updates (ICO Code). Systems will be operated fairly, transparently, within the law, and only for the stated purposes in this LA Code. The ICO Code is published on the Commissioner's website www.ico.org.uk.

3.2 Local authorities and Police in England and Wales are 'relevant authorities' who must pay due regard to the 12 Principles of the Surveillance Camera Code of Practice (SCC Code) when operating surveillance camera systems, overtly, in public places and can be held accountable for failing to do so. In addition to the Tiverton **Town Centre CCTV System**, MDDC operates smaller schemes which are defined as public space schemes and listed at 1.5 of this Code. MDDC will apply the Surveillance Commissioner's Code to all it use of surveillance systems. [Amended Surveillance Camera Code of Practice \(accessible version\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

3.3 A Surveillance Camera Commissioner is appointed to oversee and promote compliance with the Surveillance Commissioner's Code. A 'toolkit' of documents has been produced to assist authorities meet compliance requirements. In general, the Surveillance Commissioner's Code covers the role of surveillance from the beginning to the end; 'cradle to judgement' (courts or disposal). MDDC applies the use of these documents in all operational areas. Every use of SCS will always be reasonable, necessary, and proportionate.

3.4 The decision to install new or updated SCS will be supported by operational needs-assessment documentation and a surveillance-specific Data Protection Impact Assessment (DPIA) to risk assess surveillance data processing and privacy issues. These documents will be completed before deciding to install. All installations must be justified to meet a 'pressing need' where it is being considered. When considering the use of SCS MDDC will, where possible, consult with relevant parties as appropriate.

3.5 Operating procedures relevant to individual operational areas will compliment this LA Code and ensure responsible and accountable supervision of all types of MDDC surveillance operations. Evidence will be kept securely and made available to ensure everyone's right to a fair trial in the event of any court or tribunal proceedings.

3.6 Occasionally SCS may be required to assist with 'covert' directed operations (e.g. by Police, Competent Authorities, HMRC etc.). Proper authority will be obtained and comply with the Regulation of Investigatory Powers Act 2000 (RIPA). The Surveillance Commissioner (SSC) and subsequently the Investigatory Powers Commissioner (IPC) regulate and oversee how public authorities use their investigatory powers. When

undertaken solely by MDDC, any covert directed surveillance authorised will meet the required 'crime threshold' and be further authorised by a Magistrates' Court.

3.7 All processes related to use of SCS will be regularly reviewed, at least annually, to ensure continued use of surveillance remains justified. Managers in operational areas will be required to maintain documentation in a Code Assessment Pack (CAP) which will demonstrate that each scheme continues to operate in compliance with the LA Code, and present this to the SPOC at the annual desktop assessment.

3.8 Any major changes to the LA Code will only take place after consultation with key stakeholders in the operation of any specific SCS system. Minor changes may be agreed between the persons nominated in Appendix A.

4. Data Protection Information

The UK GDPR were introduced in May 2018. The DPA 2018 implements UK GDPR standards across all general data processing and provides clarity on the definitions used in the UK context. It is important the UK GDPR and the DPA 2018 are read in conjunction with each other. They are known collectively as the 'data protection laws'.

For processing to be lawful under Article 6 UK GDPR, organisations need to identify a lawful basis before processing personal data. MDDC consider their lawful basis to be 6(1)(e) 'Public task': the processing is necessary to perform a task in the public interest or for official functions, and either has a clear basis in law and when used away from official public tasks-

The Data Controller is MDDC and the SRO for MDDC surveillance systems is the Director of Legal, People & Governance and Monitoring Officer. Data Control has been further delegated to a SIO/DPO. The Data Controller and SIO are responsible for:

- All copyright and ownership of all material recorded by virtue of the systems
- Full compliance with UK GDPR and DPA 2018
- Ensuring the rights of access to personal data by individuals (Subject Access) is managed
- Ensuring all other requests for disclosure of data held on the systems is managed
- Ensuring auditable accountability through a range of policy and procedures
- Receive and deal with all complaints from the public relating to the systems

Please read Section 7 of this LA Code for more information on requests to view and disclosure of surveillance data. The SPOC is responsible for the day-to-day oversight of operational management of the surveillance systems.

5. Management and Operation of Surveillance Camera Systems

5.1 General

All equipment associated with either the MDDC public space CCTV system or the SCS operated in other service delivery operational areas, (regardless of whether it is connected to the CR), will only be operated by personnel who have been properly trained in its use and relevant operating procedures.

All RO or sub-contractors responsible for any MDDC SCS will be careful about exercising personal prejudices which may lead to complaints about SCS being used for purposes for which it is not intended.

Officers may be required to justify their monitoring, recording, or disclosing of images of any persons, activity, or property at any time.

5.2 Deciding to use SCS and Camera Locations

Having considered Section 3 of this LA Code, if using surveillance is the most appropriate means of addressing a pressing need, cameras will be sited in positions to meet that need after preparing the documents/DPIA mentioned in 3.4 above. SCS must be justified, meet the purpose for which it was installed, and recordings must be of an appropriate quality.

Cameras will be prominently placed in positions within public view. As far as possible cameras will not be hidden or obscured and be sited in positions that minimise risk to tampering, damage or destruction.

As far as is reasonable, all SCS must meet the purposes agreed for their use and recordings must be of an appropriate quality.

Cameras will be restricted to ensure they do not view areas that are not of interest and are not intended to be seen, e.g. an individuals' private property. Electronic 'privacy zones' may be used to ensure that the interior of any private property cannot be viewed. Individuals who have concerns over any potential intrusion of their privacy may request a review of camera locations by writing to the SPOC at the details given in **Appendix A** of this Code. MDDC does not use any 'dummy' cameras.

5.3 Signs

Signs will be placed in the areas covered by cameras to make people aware of SCS surveillance.

Appropriate signs will be deployed on the main access routes into Tiverton in suitable positions to inform both vehicle drivers and pedestrians that SCS operates in the area. Signs will be used at strategic locations around the town centre areas covered by cameras as reminders of SCS in operation. Signs will also be positioned on and in buildings and vehicles owned and managed by MDDC where surveillance systems are used.

The signs will indicate:

- The presence of SCS monitoring (typically using a graphic of a SCS camera)
- The 'ownership' of the system (unless its plainly obvious)
- The intended purpose of the system (i.e. crime prevention; public safety and security)
- An up-to-date contact telephone number for further information and access to recordings

5.4 Transmission, Recording and Storing SCS Images

CCTV cameras send images to the CR or direct to a local on-site recording device using a variety of methods. These include cables, wireless signals, and computer networks. Security of transmission remains paramount. Transmission will either be owned by MDDC or provided under contract by an industry supplier.

MDDC uses Network Video Recorders (NVRs) to record the images from all cameras throughout every 24-hour period. The NVR's are either housed securely in the CR or in secure locations at specific MDDC sites. Recorded images are retained on the NVR's for no longer than 31 days. Retention periods may vary dependant on site specific issues. Future storage requirements may include cloud-based solutions. If so, data security measures will be employed to ensure MDDC is compliant with the data protection laws.

All recordings stored at the CR at Tiverton or at the Exeter City Council Control Room in Exeter can be replayed on the dedicated computer workstations in these secure areas. Only authorised staff / sub-contractors can download copies of recorded images when required for approved purposes. These images will then be kept for longer in accordance with the rules of evidence.

After retention, the recorded images are erased using an automatic digital process called 'overwriting'. This meets the requirements of not keeping data for longer than necessary, a principle of data processing.

At any other MDDC site, any recording, viewing, and exporting of images will only be undertaken by trained and authorised staff. All MDDC staff acknowledge the public must have total confidence that information recorded about them will be treated with integrity and confidentiality.

5.5 Monitoring SCS images

The CR at the Multi Story Car Park in Tiverton accommodates the CCTV Server Recording equipment, single monitoring station (for fail-over/ disaster recovery purposes) with images (live and recorded) being available to a CR for the main public space and the MSCP CCTV system. The SCS monitoring services has been contracted to Exeter City Council who operate their own Control Room to monitor their own public space surveillance CCTV systems as well as those of several neighbouring local authorities on a sub-contract basis. The Exeter City Council Control Room is staffed by qualified, competent and trained operators in accordance with MDDC policy and operational procedures (to compliment the Exeter City Council policies). (See Section 6 for details re CR).

At some MDDC sites where SCS is installed and not linked to the CR, monitors are installed to provide authorised staff with the opportunity to watch 'live' or review recordings when necessary; for example the sports/leisure centres. Monitoring is not a prime function at these sites.

Staff at all sites (via the SPOC) will be fully conversant with this LA Code and their specific operational procedures which they will be expected to comply with as far as reasonably practicable at all times.

5.6 ANPR

MDDC does not use ANPR cameras at this time.

5.7 Body Worn Video (BWV)

Where used by MDDC employees, BWV are cameras worn by a person and usually attached to their clothing or uniform. BWV units can record both video and audio information. This technology is in regular use by law enforcement agencies. BWV systems are more intrusive than the more 'normal' SCS systems because of its mobility and use in 'close-up' situations with people.

This LA Code does not apply to BWV, which has a specific Code of Practice for its operation and which should be referred to for this purpose.

Before MDDC decided to use BWV, it followed all the general principles set out in Section 3 of this LA Code. Its use is justified, proportionate, necessary and addresses a pressing operational need.

MDDC deploy BWV equipment on staff engaged in enforcement to support the purposes of surveillance stated in Section 2 of this Code. The user or the BWV unit is clearly labelled. BWV will be specifically used in 'incident-specific' circumstances to gather evidence and to protect MDDC officers in hostile situations, or when there is reason to think that a situation may result in a complaint against MDDC.

BWV recordings are managed via evidence management software. Individual users cannot access data on the BWV device. Use of BWV will be compliant with the ICO Code for Surveillance Systems and the College of Policing BWV Code of Practice. All MDDC BWV users will be suitably trained before being used.

5.8 Audio Recording

MDDC considers the use of audio recording, particularly where it is continuous, to be more privacy intrusive than purely video recording. Its use will therefore require much greater justification.

MDDC will not use sound recording facilities with its main public space SCS system. Audio recording may be used in other circumstances, for example, BWV as above, for safeguarding or complaints.

MDDC will only use audio recording where:

- A pressing operational need is identified, and other less intrusive methods have been explored
- The need cannot be appropriately addressed, and the only way is the use of audio recording
- Appropriate 'data protection by design' methods have been incorporated into the system

Where MDDC decides to use audio recordings in specific circumstances they will ensure:

- A thorough camera-specific DPIA will be carried out.
- The system provides a high enough quality of recording to achieve the stated aim.
- The most privacy friendly approach is used; where video and audio recording can be controlled and turned on and off independently of each other. These two types of data processing should be considered as separate data streams and should be controlled separately to ensure irrelevant or excessive data is not obtained and held.
- It must be proportionate.
- Where considering the use of audio with SCS MDDC will, where possible, consult with relevant parties as appropriate. It is made clear to data subjects that audio recording is taking place, over and above any visual recording which is already occurring

Recording of two-way audio feeds from 'help points' covered by SCS cameras is deemed acceptable where it meets an operational need and are activated by the person requiring assistance.

Signs will be prominently displayed indicating audio recording is used.

5.9 Redeployable SCS

Re-deployable SCS (mobile) cameras can be moved from one location to another and be fully operational within a short time. They are used to follow incident or crime hotspots whenever and wherever they appear. MDDC may use this technology when necessary; for example, environmental enforcement for fly-tipping.

Deciding to use and deploy this technology will require the same standards as set out in Sections 3 and 5.2 of this LA Code, albeit in a suitable format to provide for speedy deployment when necessary. Use of re-deployable (mobile) cameras will always be in accordance with the law, national and local guidance and accountable through specific operating procedures.

5.10 Access to Recordings and Audit Trail (Record keeping)

Access to any monitoring or recording equipment in any MDDC service delivery operational area is restricted to ensure security and confidentiality of the information processed. Only nominated key staff/sub-contractors will be allowed to access equipment and recordings for proper reasons and must only be for the stated purposes of SCS.

Access control measures will be used to ensure security and confidentiality where necessary. There will not be any public access to equipment or recordings at these sites. Individual subject access to 'personal data' is not affected by this clause.

There will be records kept, either paper-based or electronically on a computer, of all relevant activity associated with the operation and management of any such SCS. This will typically include but not be limited to:

- Actions taken by operational staff and incidents reported to or seen by them
- Request, Review, Download and Release of any recorded images
- Fault reporting and rectification and the regular maintenance programme

Every recording or operational audit record has the potential of being required as evidence at some point.

All record keeping will be carried out in accordance with user-specific operating procedures overseen by individual RO in each operational area.

5.11 Maintenance of SCS

MDDC will ensure all the SCS are properly maintained in accordance with operational procedures and maintenance agreements. Maintenance agreements will make provision for regular/periodic service checks on the equipment which will include cleaning of all-weather domes or housings, checks on the functioning of the equipment and any minor adjustments that need to be made to the equipment settings to maintain picture quality. Agreements will also include regular periodic overhaul of all the equipment and replacement of equipment, which is reaching the end of its serviceable life.

Maintenance agreements should also provide for 'emergency' attendance by a specialist SCS engineer to rectify any loss or severe degradation of image or camera control. Appropriate records will be kept by MDDC RO and the maintenance contractor.

Exeter City Council Control Room Staff will be issued with contact details for the MDDC CCTV maintenance contractor for the purposes of engaging emergency callout facilities and services where required. Maintenance records left at the Exeter City Council Control Room will be forwarded to MDDC to retain.

5.12 Discipline

Every individual (directly employed staff or sub-contract staff) with any responsibility for SCS under the terms of this LA Code or related user-specific procedures will be subject to agreed disciplinary procedures. Any breach of this LA Code or of any aspect of confidentiality may be dealt with in accordance with those disciplinary rules. A breach of the LA Code may result in criminal proceedings.

6. MDDC CCTV Control Room

6.1 General principles

The CCTV CR is a secure facility located within Tiverton where connected CCTV and surveillance equipment systems are managed and operated in the day to day management of public areas. It accommodates the central switching recording and ancillary equipment for the Tiverton Town Centre CCTV system along with the facility to monitor the system if required. The images are transmitted over BT Fibre Optic cable to the Exeter City Council Control Room at St Stephens House, Exeter where they are monitored both live and proactively and recorded in response to reported incidents or events. There is a formal agreement in place for Exeter City Council to undertake the monitoring of these cameras.

6.2 Control Room

The Exeter City Council Control Room is the central facility for monitoring Tiverton public space CCTV for recording and monitoring purposes. MDDC 'contracts out' its SCS monitoring to Exeter City Council and also 'contracts out' its preventative and corrective maintenance services to a specialist contractor. The Exeter City Council Control Room is fully staffed by trained and accredited staff to provide fully specified MDDC services in accordance with MDDC CCTV and SCS policy and specific operational procedures as agreed under a formal agreement with Exeter City Council.

All staff will be fully conversant with this LA Code and their operational procedures which they will be expected to comply with as far as reasonably practicable at all times.

The Control Room operator's main role is to continuously monitor, identify and respond to incidents. Operators using any MDDC cameras will always act with utmost integrity. The cameras and recordings will only be used for the purposes listed at Section 2 of this LA Code. All staff responsible for SCS, will be careful about exercising prejudices which may lead to complaints about SCS being used for purposes for which it is not intended.

Cameras will not be used to look into private residential property. Operators can be required to justify their interest in, or recording of, any individual, group of individuals or property at any time.

6.3 Private Security Industry Act 2001 and the Security Industry Authority (SIA)

Under the provisions of the Private Security Industry Act 2001 it is a criminal offence for staff to be 'contracted' as public space surveillance (CCTV) operators in England, Wales, and Scotland without a Security Industry Authority (SIA) licence. The SIA is responsible for regulating the private security industry. For more information visit: www.sia.homeoffice.gov.uk

Staff carrying out monitoring tasks for MDDC will be competent, experienced and qualified SIA CCTV Licence Holders in compliance with this legislation.

6.4 Staff Vetting

It is a condition of employment that all staff being selected for a role in the CR are successful through locally agreed vetting procedures and those defined by the SIA for an SCS Licence. As an 'Airwave' Police Digital Radio is installed, staff will be vetted to Non-Police Personnel standard as required by the National Police Chiefs Council (NPCC; previously ACPO) and Devon and Cornwall Police.

6.5 Staff Training

Every member of staff directly connected to the operation of SCS or with responsibility for the CR will be trained appropriately for their role. As a minimum the SIA CCTV Licence demands a structured training programme that results in a recognised qualification. The Information Commissioners Surveillance Code requires all staff to be trained in their responsibilities for data management.

6.6 Access to and Security of CR

Access is restricted to ensure security and confidentiality of the information inside the CR. Robust access control measures will be used to restrict access to authorised Exeter City Council Control Room or MDDC staff ensuring security, integrity, and confidentiality. If the CR is left unattended for any reason it will be secured. In the event of evacuation for safety or security reasons, standard operating procedures will be complied with.

General entry will not be allowed without sufficient reason and must only be for the stated purposes of CCTV. Any formal requests that are received from members of the public requesting entry to the control room will be dealt with by the MDDC Responsible Officer.

Except where used for training or demonstration purposes there shall be no public viewing of the monitors. Images of areas in which individuals would have an expectation of privacy will not be made available for these purposes nor will they be viewed by non-authorised persons.

Regardless of anyone's status, all access to the CR will be recorded in a Visitors Log. All visitors will be reminded of the need for confidentiality by displayed notices and a clause in the Visitors Log. Operational staff will ensure only authorised access and an accurate visitors log is maintained and enforced.

ROs, who frequently go into the CR as part of their daily duties are exempt from signing the Visitor Log providing, as they would have signed a Declaration of Confidentiality.

6.6 Use by Law Enforcement Agencies

From time-to-time arrangements may be made for law enforcement staff to be in the CR to support their operations with CCTV. If this involves 'covert' operations by specific law enforcement agencies, then on every occasion the SPOC must be satisfied that proper authority has been obtained under the Regulation of Investigatory Powers Act 2000 (RIPA). Only trained and authorised staff with responsibility for using the

CCTV equipment will have access to the controls and operate the equipment. The presence of law enforcement agencies will always be supervised by an authorised user from within the CR and in accordance with this Code and agreed operational procedures. CR operations will always have primacy. Security, safety, and protection of the public will remain paramount.

6.7 Declaration of Confidentiality

Every individual with responsibilities connected to the CR or any surveillance system linked to it under this Code or related procedures will sign a declaration of confidentiality. The signed copy will be held by the ECC or MDDC Responsible Officer for the PSS SCS.

7. Viewing and Disclosure of CCTV Recordings

7.1 General Principles

Requests for access to, viewing and disclosure of recorded images from any MDDC CCTV or other SCS will be controlled in accordance with defined procedures and consistent with one or more of the purposes listed in Section 2 of this Code.

Safeguarding an individual's rights to privacy will always remain a priority.

SCS information will not be copied, sold, disclosed, or used for commercial or entertainment purposes. Occasionally recordings may be used by MDDC for:

- Training and demonstration purposes but the material will be selected by the MDDC RO and its use will be strictly controlled
- to assist in the general planning and management of the areas of SCS coverage
- to assist in identification and compiling of information relating to public safety
- to assist in the efficient management of service delivery in the areas of SCS coverage

Written authorisation from the relevant RO will be required before access for research purposes. The copying of material or its removal from any MDDC surveillance system for research purposes will only be permitted under exceptional circumstances and shall be fully documented.

Where necessary, final judgements about content of any third-party disclosure will be made by the MDDC Data Controller in consultation with the DPO/SIO.

Author's Note: 'Detailed MDDC Guidance on Viewing and Disclosure to Third-Parties' should be prepared and read in conjunction with this LA Code. Only key aspects are covered in this section.

Copyright and ownership of all information relating to recordings from MDDC surveillance systems will remain with the Data Controller. Once SCS images have been disclosed to another body (such as the police), then they become the Data Controller for their copy of the images. It is their responsibility to comply with the data protection laws in relation to any further disclosures.

7.2 Requests for Viewing of CCTV Recordings

Under Article 30 of the GDPR, larger organisations are required to maintain a record of their processing activities. Any request for viewing or access to any MDDC SCS data must be documented for accountability; a key principle of data processing and compliance with the DPA 2018. It allows MDDC (or Exeter City Council on behalf of MDDC) to request information or details from individuals requesting information relating to recordings from surveillance systems.

All requests for viewing (and disclosure) of any MDDC CCTV data will be in accordance with service delivery operational procedures. For SCS recordings held at the CR, the management of requests will be the responsibility of the Operations Manager for Property and Commercial Assets. In other service delivery operational areas, requests for viewing (and disclosure) of SCS images will be the responsibility of the RO or nominated individual based and if necessary, in consultation with the SPOC.

All requesters will be encouraged to submit or complete documented requests. Requests from the police service will be 'in writing' but may be a specific document used by police forces and emailed to MDDC. An MDDC form is to be used for this purpose.

7.3 Disclosure to Members of the Public - Subject Access Requests

The Data Protection Act 2018 gives individuals rights of access to their personal information held by MDDC. Subject access is a fundamental right for individuals, but it is also an opportunity for MDDC to provide excellent customer service by responding to Subject Access Requests (SARs) efficiently, transparently and by maximising the quality of the personal information held. Requests by members of the public for CSC images are limited to 'personal information' as required by DPA 2018. Third-party information (e.g. another's' identity or vehicle registration number) will not be disclosed through SARs. If other third-party information is shown with the images of the applicant, images will be suitably obscured.

A valid SAR must always be made in writing. This can be by letter, online form or via email to the Information Management Team: DPO@middevon.gov.uk. The applicant will be asked to complete a form with sufficient information to validate their identity and enable the data to be located. MDDC has a maximum of a month starting from the day the request and identification (if required) is received. This is a statutory requirement which must be adhered to. In exceptional circumstances an extension can be agreed with the Information Management Team.

Generally, information will be provided free of charge. There are exceptions.

SAR's will not be granted in circumstances that may prejudice the prevention or detection of crime and the apprehension or prosecution of offenders. Other disclosure rules may apply.

Further advice on SARs is given in the ICO CCTV Code of Practice and a Your Right of Access which are published on the Commissioner's website www.ico.org.uk

7.4 Disclosure to Members of the Public – Freedom of Information Act 2000

The Freedom of Information Act 2000 (FOIA) gives the public a general right of access to official information held by most public authorities (police or councils, etc.). It also applies to companies which are wholly owned by public authorities. Typically, it applies to information around decisions, statistics, spending money and effectiveness. Requests may be by letter or email. The public authority must state whether it holds the information and normally supply it within 20 working days in the format requested.

When responding to requests, there are procedural requirements set out in the FOIA which an authority must follow. There are also valid reasons for withholding information, which are known as exemptions. FOIA exemptions apply to disclosure of SCS images.

If the images are those of the FOIA applicant - the information will be treated as a SAR as explained at 7.3 above. If the images are of other people/vehicles etc., these can only be provided if disclosing the information does not breach the data protection principles.

In practical terms, if individuals are capable of being identified from the relevant SCS images, then it is personal information about the individual concerned. It is unlikely that this information can be disclosed in response to an FOIA request. The applicant could potentially use the images for any purpose and the individual concerned is unlikely to expect this and so it likely to be unfair processing breaching the DPA 2018.

NOTE: No matter how a request is received there is no requirement for the requester to mention either the DPA 2018 or Subject Access for it to be a valid request. In some cases, the requester may even state the wrong legislation e.g. Freedom of Information Act, but the request will still be valid.

It is the responsibility of the officer dealing with it to appropriately recognise a request as one for personal data and refer it to the Information Management Team if they are not sure they should check before disclosing any information.

This guidance is not exhaustive. Full details on FOIA issues are found at the ICO website; www.ico.org.uk

7.5 Disclosure to Other Third Parties

Requests to view and disclosure of recorded images from any MDDC CCTV or other surveillance camera system will normally be granted to organisations or specific individuals (other Third Parties) that show they are a bona-fide applicants with a legitimate interest in the SCS recordings and show valid reasons which must meet the purposes listed in Section 2 of this LA Code.

Where this is not an SAR or FOI, a charge may be applied on a case-by-case basis.

These are mainly (but not limited to) the following organisations:

- All UK police staff, (including Ministry of Defence and Military Police)
- Statutory authorities with powers to prosecute, (e.g. H.M. Revenue and Customs, Local Authorities, Trading Standards, Environmental Health, and any other 'competent authority'.)
- Solicitors or their legal representatives in criminal or civil proceedings
- Individuals representing themselves in judicial proceedings. Please be advised data will only be released in accordance with DPA guidelines
- Other agencies (e.g. Insurance companies) according to purpose and legal status. A fee may be charged to cover costs of searching, copying and disclosure. Some requests may be treated as a DPA Subject Access Request if an individual has authorised an SAR submission on their behalf

A third-party request (TPR) applicant should provide sufficient information to enable an assessment of type of request; [i.e.: is it a data subject access request for 'personal data' or a general access request from a bona-fide entity?] and the relevant data to be located. Information that is too broad or covers extensive time periods making it difficult to locate the data will need to be revised and more specific. All requests for information will be scrutinised in detail. Viewing and disclosure of information will not be unduly obstructed, but MDDC may refuse requests due to insufficient information or invalid reasons.

The correct disclosure form should be completed in every case.

If validated, the request will proceed. Access to and disclosure of SCS data held on MDDC surveillance systems (data export) will come from a range of users.

7.6 Disclosure to the Media

Requests for SCS images from the media will always be considered if it meets the stated purposes or is in the public interest to be disclosed. Judgements about disclosure to the media will be made by the SPOC in consultation with MDDC communications staff and Information Management Team where necessary. The disclosure will include a signed release document that clearly sets out what the data will be used for, the limits on its use and retention of editorial control by MDDC.

Devon and Cornwall Police or other police force will be permitted to release recorded material to the media in connection with an investigation or detection of a crime without prior approval of MDDC. SCS recordings subject to approved release should relate to specific incidents and only be released in accordance with the

NPCC media guidance and Devon and Cornwall Police procedures. Strict copyright conditions that do not allow it to be used for entertainment or any other purposes will apply.

The SPOC and communications staff should be advised of the release of the recorded material to the media. Every effort should be made to give the notification prior to its release.

8. Reviews and Audits of MDDC Surveillance Camera Systems

8.1 General principles

- i. To ensure compliance with Data Protection and Protection of Freedoms laws and their Codes of Practice, the continued use SCS cameras requires periodic reviews. The Surveillance Camera Code of Practice requires effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published. This will be coordinated by the SPOC who will set minimum expectations on who and how a SCS system will be reviewed to assess system effectiveness and justify its continued use. This is recommended to be at least an annual desktop assessment.
- ii. In advance of the annual desktop assessment the SPOC will send a questionnaire to each site's RO for completion as part of the review process.
- iii. Regular checks and audits should be conducted more frequently by the RO in each service delivery operational area to ensure that policy and site procedures are always being complied with.
- iv. The process of using documented surveillance operational assessments and DPIA's will make the annual review more straightforward. Where evidence shows a SCS camera location continues to be justified the camera will remain. Where evidence, gathered over a 12-month period, cannot be found to show that a SCS camera location continues to be justified the camera use should be reconsidered by MDDC in consultation with SCS operational stakeholders.

8.2 Maintaining a Code Assessment Pack (CAP)

ROs in each operational area are required to maintain documentation in a Code Assessment Pack (CAP) which will demonstrate that their systems continue to be operated in compliance with this LA Code, and present their evidence to the SPOC at the annual desktop assessment. Typical CAP contents will be (but not limited to):

- Evidence of compliance with the principles of the SC Code and other relevant legislation such as UK GDPR, DPA 2018, and Human Rights considerations including completing the Self-Assessment Tool
- DPIA - This should be reviewed when changes are made to the system

- A list of all the documents that the RO must maintain
- An asset list
- Declaration of compliance
- Records of the people authorised to access recordings
- Training records;
- Records of access requests received
- Signage review
- Any cyber considerations

Full details of the CAP can be found at: <https://www.gov.uk/government/publications/introducing-a-single-point-of-contact-guidance-for-local-authorities/introducing-a-single-point-of-contact>

8.3 Annual Report

Using the above review information, the SPOC will prepare and publish an annual report of MDDC surveillance camera systems. Within the main annual report there should be a subheading for the SPOC to set out the number of operational areas under their remit and to give a brief overview of any inspections, contracts associated with the schemes, number of compliments and complaints in relation to the schemes and details of the scheme's performance and priorities. This approach includes the wider issues for justifying continued of SCS.

From time-to-time one or more systems will be independently audited to assess its overall performance.

9. Making Enquiries or Complaints about SCS

A member of the public wishing to make enquires, compliments or a complaint about any aspect of an MDDC surveillance camera system may do so by contacting the SPOC. See **Appendix A** of this Code.

All complaints will be treated seriously. They will be dealt with in the same way as the discipline and complaints procedures which apply to all staff or sub-contractors employed by MDDC.

The SPOC will ensure that every complaint is acknowledged and include advice about the procedure to be undertaken. Details of all complaints and the outcome will be included in the SCS annual report.

If the outcome from a complaint about how the SCS system operates or how images (data) were handled is thought to be unsatisfactory this should be reported to the DPO/SIO as soon as possible, the Office of the Information Commissioner may investigate independently. Individuals have additional rights under DPA 2018 to prevent processing likely to cause substantial and unwarranted damage or distress and to prevent automated decision-taking in relation to the individual.

Visit; www.ico.org.uk ; telephone 0303 123 1113 or write to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Appendix A

Key Roles and Responsibilities

1. Ownership

The Owner of all MDDC surveillance camera systems is:

Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

Tel. 01884 255255

<https://www.middevon.gov.uk>

Through the office of the Chief Executive, MDDC will:

- Determine the purposes, and the way, any surveillance camera system is established and be the data controller of any personal data is processed by them. MDDC is the data controller of all personal data used and held within each individual department.
- Appoint key roles to support the management of surveillance camera systems across its area of responsibility to ensure that all such equipment, it's siting, deployment, and management is compliant with a complex framework of legislation, regulation, and guidance.

2. Management

2.1 Senior Information Officer (SIO as defined above)

The Council's DPO/SIO will:

- i. Ensure compliance with the GDPR and DPA 2018 and is responsible for upholding data subject's rights in relation to various aspects of the Act on behalf of the Owner
- ii. Review completed surveillance camera specific data protection impact assessments (DPIA as set out in Article 35 of the GDPR and Section 64 DPA 2018) from each MDDC operational area and should advise on compliance and whether processing can proceed
- iii. Ensure that each Service Delivery Privacy Notice includes references to data processed by surveillance cameras to meet the principles of transparency and accountability

2.2 Senior Responsible Officer (SRO as defined above)

- i. Take strategic responsibility for compliance with the PoFA in support of the Chief Executive in respect of all relevant MDDC surveillance camera systems

- ii. Ensure that the interests of the Council are upheld in accordance with the 12 principles of the Surveillance Camera Code of Practice under Section 33(5) of the PoFA. MDDC is an organisation in England and Wales that must have regard to the Surveillance Camera Code of Practice
- iii. Be supported by a SPOC to ensure day-to-day compliance with the Surveillance Camera Code of Practice and all related matters
- iv. If you have any concerns or questions about how we look after your personal information or compliance with the Surveillance Camera Code of Practice, please contact us at [Contact Customer Services - MIDDEVON.GOV.UK](#) or call 01884 255255.

2.3 Single Point of Contact (SPOC)

The SPOC is the MDDC Operations Manager for Corporate Property and Commercial Assets and will:

- i. Be the day-to-day management and operational support to the SRO and DPO/SIO for all matters relating to any MDDC surveillance systems
- ii. Act as the main contact point for anything related to a surveillance camera system and apply consistent policies and procedures to all systems at an operational level
- iii. Establish and maintain an MDDC Code of Practice (this LA Code) which sets out the governance arrangements that all schemes must comply with and provide regular guidance and updates to ROs
- iv. Carry out an audit of MDDC surveillance camera systems to find out exactly what type of systems are being used by the council across all operational areas; where all its cameras are located and who has responsibility for them
- v. Ensure that any MDDC staff operating SCS are properly trained, keep them up to date on changes to legislation and help them to develop
- vi. Standardise signage, set out clear roles and responsibilities, improve competence across the council and set up a governance board to scrutinise the use of SCS across MDDC
- vii. Appoint Responsible Officers for service delivery operational areas and advise on changes to schemes including adding or removing cameras, and where they are best located

The SPOC should read and understand their role as set out in 'Guidance: Introducing a Single Point of Contact (SPOC) <https://www.gov.uk/government/publications/introducing-a-single-point-of-contact-guidance-for-local-authorities/introducing-a-single-point-of-contact> This document is primarily aimed at local authorities but can be utilised by any organisation operating video surveillance systems

If you have any concerns or questions about day-to-day MDDC CCTV operations or compliance with the Surveillance Camera Code of Practice, please contact us at [Contact Customer Services - MIDDEVON.GOV.UK](mailto:Contact.Customer.Services@MIDDEVON.GOV.UK) or call 01884 255255.

2.4 Responsible Officers (RO)

A Responsible Officer (RO) will be appointed at all MDDC service delivery operational areas using surveillance systems. They will:

- i. Fully comply with relevant laws, regulations, and the contents of this LA Code of Practice
- ii. Be responsible for the day-to-day management of their operational area use of SCS
- iii. Support the SPOC understanding any changes to their system, whether the system remains fit for purpose and whether a maintenance contract is still in place for the system
- iv. Ensure audit trail documentation is maintained for image management activity
- v. Undertake regular reviews of operational procedures to ensure compliance
- vi. Maintain a Code Assessment Pack (see at 9.2 of this Code), complete an annual questionnaire supplied by the SPOC and present their evidence to the SPOC at the annual desktop assessment

Full details of the CAP can be found at: <https://www.gov.uk/government/publications/introducing-a-single-point-of-contact-guidance-for-local-authorities/introducing-a-single-point-of-contact>

Appendix B **Mid Devon District Council Surveillance Camera Systems**

1.0 MDDC SCS

The Council owns and operates a number of Surveillance Camera Systems in its towns, buildings and offices as part of its function to provide safe environments for all.

1.1 The Council has the following camera numbers at the following sites:

a) Tiverton Town Centre SCS System	40
b) Tiverton Multi-Storey Car Park, Phoenix Lane	24
c) Phoenix House	32
d) Old Road Housing Depot	8
e) Carlu Waste Depot (Hitchcocks Business Park)	24
f) Exe Valley Leisure Centre	16
g) Lords Meadow Leisure Centre	14
h) Culm Valley Sports Centre	12

The Council owns a total of 170 surveillance cameras across 9 sites.

A list of all cameras for each of the above locations is retained by MDDC Property Services.