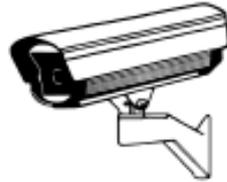




**WOKING BOROUGH COUNCIL**  
**In partnership with Surrey Police**



# **Code of Practice For the Operation of Closed Circuit Television**

## **AUGUST, 2007**

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# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



### Preface

Since its introduction to retailers in 1967 and to a town centre in 1985, the use of closed circuit television across the UK has become increasingly popular. Arguably, CCTV is one of the most powerful tools to be developed during recent years to assist with efforts to combat crime and disorder whilst enhancing community safety. Equally, it may be regarded by some as the most potent infringement of people's liberty. Therefore, if users, owners and operators of such systems are to command the respect and support of the general public, the systems must not only be used with the utmost probity at all times, they must be used in a manner which stands up to scrutiny and is accountable to the very people they are aiming to protect.

Woking Borough Council & Surrey Police as partners in CCTV are committed to the belief that everyone has the right to respect for his or her private and family life and their home. This partnership also believes that there should be no interference by any public body with the exercise of this right except such as may be in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

This Code of Practice, in conjunction with the Standard Operating Procedures Manual, is intended as far as reasonably practicable, to safeguard the integrity of any CCTV System, whilst ensuring the right to privacy is not breached.

Chief Executive  
Woking Borough Council  
Civic Offices  
Gloucester Square  
Woking, Surrey  
GU21 6YL

Divisional Commander  
North West Surrey Division  
Surrey Police  
Surrey

December 2009

Whilst the content of both documents is thought to be accurate at the time of origination, differences and alterations to laws of evidence and procedural matters will inevitably arise. The content of either or both documents is not intended to form a contract. Neither Woking Borough Council nor Surrey Police can accept liability for any error or omission or for the advice, guidance or information contained within either the Code of Practice or the Standard Operating Procedures Manual.



# WOKING BOROUGH COUNCIL

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<b>Contents</b>	<b>Page</b>
Background	4
Certificate of Agreement	6
Record of Approved Changes to the Code	7
<b>SECTIONS</b>	
Section 1 Introduction and Objectives	8
Section 2 Statement of Purpose and Principles	10
Section 3 Privacy and Data Protection	15
Section 4 Accountability and Public Information	17
Section 5 Assessment of the System and the Code of Practice	20
Section 6 Human Resources	22
Section 7 Control and Operation of the Cameras	23
Section 8 Access to, and Security of, Control Room and/or Associated Equipment	24
Section 9 Management of Recorded Material	25
Section 10 Video Prints	28
<b>SCHEDULES</b>	
Schedule 1 Locations of Cameras	29
Schedule 2 Key Personnel and Responsibilities	33
Schedule 3 Operational Procedures	35
Schedule 4 Complaints Procedure	46
Schedule 5 Extracts from Data Protection Act 1998 and Data Protection Principles	47
<b>APPENDICES</b>	
Appendix A National Standard for the Release of Data to Third Parties	59
Appendix B Restricted Access Notice Warning	67
Appendix C Declaration of Confidentiality	68
Appendix D Regulation of Investigatory Powers Act 2000 (RIPA) Guiding Principles	69
Appendix E How to Apply for Access to Information held on the CCTV System	74
Appendix F References	80



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## Background

In 1994, Woking Borough Council approved the development of a Woking Town Centre CCTV system in partnership with Surrey Police Woking. On 12 July, 1994, a Steering Group formed to agree some basic principles for the system and to lead into the design and installation part of the project. It was agreed at an early stage that the Council would look to fund the capital cost of the scheme, including the control room. The police would look to fund the revenue costs (mainly staffing of the control room), with support from the Council (maintenance) and, if possible, the business sector.

The Council also wished to include car parks in the scheme, although at the time, this was not a priority for the police. In addition, it was proposed to seek the integration of the railway station and serving car parks/connecting pedestrian route in the scheme.

As a starting point, the partnership was one of the first to use a new Home Office methodology for defining the purpose of the system. Research into CCTV had revealed a very high percentage of "poor performance" in CCTV throughout the country. A "check list" of plain English points covering basic analysis like "what is to be observed", through to expected picture quality and risk/ benefit, priority analysis, combined to form an "OPERATIONAL REQUIREMENT" or "OR" document.

Surrey Police prepared the OR for the Town Centre and Woking BC prepared the OR for the car parks, in consultation with the Police.

Recognising the wide range of technical issues involved in CCTV, the partnership engaged the government's own consultants, SAFE (Security and Facilities Executive - then part of the Cabinet Office) of whose brief was to translate the OR into a design, ready for installation.

The available funds were earmarked to construct a new control room with the ability to expand the system in the future and to provide the picture transmission media (mainly fibre optic cabling through CableTel Surrey & Hampshire - now NTL-Virgin Media). This left a relatively small amount of money for cameras in the Town Centre, which were prioritised by the police from the OR.

In 1995, the Council, as part of its business planning process, decided to enhance the system to include all the town centre car parks. Coincidentally, the Home Office held a City Challenge competition, inviting bids from local authorities for capital funding of CCTV schemes. The Council made a bid in partnership with the Police, supported by COTAC, the local Chamber Of Trade and Commerce, and was successful, being awarded some £217,000 for Woking's scheme. This was the second highest award in the South-East.



# WOKING BOROUGH COUNCIL

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Following a competitive tender exercise for the design, installation and, rather uniquely, a 10 year comprehensive maintenance contract, a contract was awarded for the complete Town Centre and car parks scheme, with links to the railway station. Drake & Scull Technical Services Ltd, now (EMCOR Facilities Services) commenced installation with NTL-Virgin Media in September 1996. The installation was completed by the summer of 1997 without a single letter of complaint; this despite a busy Christmas period (November 96 to February 97), the need to secure building owners consent for the erection of many of the cameras and the completion of significant building alterations inside the police station control room and at the Victoria Way car park office.

The Council's consultants were briefed to submit draft Standard Operating Procedures and a draft model code of practice and officers from the police and council refined the operating procedures. At its meeting on 20 January, 1997, the Council's Community Safety Management Sub-Committee agreed to adopt the Local Government Unit model code of practice as a working document for the scheme.

The partnership undertook a week long public consultation exercise in the Town Centre demonstrating the cameras being used in the scheme. They explained the main purposes of the system and disseminated information, in the form of a Town Centre Map that outlined the principles underlying the scheme, its operation and management, i.e. public safety with privacy, re-assurance, crime prevention/detection and economic development.

The result of all these endeavours is a comprehensive town centre CCTV system, comprising 100 cameras, (50 Public Space cameras) and (50 car parks cameras) monitored in the Police station, by police officers, with links to the car parks and railway station. Since going live in August 1997, the operating procedures have been developed and refined to underpin the integrity of the scheme. The formation of a National CCTV User Group has recently led to the publication of another model code of practice which has drawn on the foundation of other documents (like the one adopted by the Council as a draft) used successfully in the last two years, together with the collective experiences of users. The following code is based on the National User Group model and it supports the Woking Town Centre Standard Operating Procedures Manual in use since 1 August, 1997.

It is currently the intention of both partners to work together and consolidate the Standard Operating Procedures to include Woking Town Centre & Car Parks.



**WOKING BOROUGH COUNCIL**  
**In partnership with Surrey Police**



**Code of Practice in Respect of  
The Operation of Public Space CCTV in  
Woking Town Centre & Car Parks  
Between  
Woking Borough Council  
And  
Surrey Police**

***Certificate of Agreement***

*The content of both this Code of Practice and the Standard Operating Procedures Manual are hereby approved in respect of the **Woking Town Centre & Car Parks Closed Circuit Television System** and, as far as reasonably practicable, will be complied with by all who are involved in the management and operation of the System.*

**Signed for and on behalf of Woking Borough Council.....**

Signature: ..... Name: ..Ray Morgan.....

Position held: ....Chief Executive.....

Dated the ..... day of ..... 2000

**Signed for and on behalf of Surrey Police.....**

Signature: ..... Name: ..Helen Collins.....

Position held: ..Divisional Commander.....

Dated the ..... day of ..... 2000



**WOKING BOROUGH COUNCIL**  
**In partnership with Surrey Police**



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**Record of Approved Changes to the Code**

<b>Date</b>	<b>Reference</b>	<b>Comment</b>	<b>By</b>
Dec. 2000	Version 1.0		MS
Dec. 2009	Version 2.0	Updated to reflect name changes in partnership and expansion of the system	EM



# WOKING BOROUGH COUNCIL

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### Section 1

## Introduction and Objectives

### 1.1 Introduction

A Closed Circuit Television (CCTV) system has been introduced to **Woking**. The system, which is known as the '**Woking Town Centre & Car Parks Public Space CCTV System**', comprises a number of cameras installed at strategic locations including **Sheerwater, West Byfleet and Knaphill**. Most of the cameras are fully functional with pan, tilt and Zoom facilities whilst others are fixed lens cameras. Images from the system are presented and recorded in two locations. Firstly, images from all public space cameras are presented in a room within the Woking Police Station and images from all Car Park cameras are presented in a room within the Peacocks multi-storey car park complex.

The police monitoring and recording (control) room is presently inter-connected to the Council's Car parks monitoring and recording control room to enable the police to make selective use or full control of the car parks CCTV system during the day and night and at times when the car parks office is closed.

Images from cameras installed by the railway at Woking Station are presented to the police control room by means of a fibre optic link and connection within the station security office.

Images from cameras installed at Camberley Town centre are presented to the police control room, monitored and recorded, by virtue of an agreement between Woking Borough Council and Surrey Heath Borough Council.

The Woking Town Centre & Car Parks CCTV System has evolved from the formation of a partnership between Woking Borough Council and Surrey Police. For the purposes of this document, the 'owner' of the system is Woking Borough Council and the 'Operator' is Surrey Police. For the purpose of the car parks, Woking Borough Council is the owner and present operator of the system; images from which may be presented in the Police Station Control Room as required.

Details of key personnel, their responsibilities and contact points are shown at Schedule: 2 to this Code.

The system is registered for the purposes of Data Protection. The owner and operator are both data controllers (1) for the purposes of this code.



# WOKING BOROUGH COUNCIL

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### 1.2 Objectives of the System

- a) During the early stages of formation, the partnership stated the objectives of the CCTV System as being:-
- *To help reduce the fear of crime and offer re-assurance to the public*
  - *To help prevent detect and deter crime*
  - *To help identify, apprehend and prosecute offenders*
  - *To provide the Police, the Council and where relevant third parties (Appendix "C") with evidence to take civil and criminal proceedings in the courts*
  - *To provide a safer environment for those who live, work and trade in the area and those who visit the area*
  - *To boost the Town Centre economy and encourage greater use of the town centre facilities, shopping, entertainment and leisure, etc.*
  - *To assist with management of Town Centre car parks*
  - *To help in maintaining public order*
- b) Within this broad outline, the partnership (through the Community Safety Strategy) will draw up, and publish specific key objectives (which will be reviewed annually) based on local concerns.

### 1.3 Standard Operating Procedures

This Code of Practice (hereafter referred to as 'the Code') will be supplemented by a separate Standard Operating Procedures manual which offers instructions on all aspects of the operation of the system. To ensure the purpose and principles (see Section 2) of the CCTV system are realised, the manual is based upon the contents of this Code of Practice.

#### **Notes**

- (1) *The **data controller** is the person(s) who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.*



## Section 2

### Statement of Purpose and Principles

#### 2.1 Purpose

The purpose of this document is to state the intention of both the owner and the operator, on behalf of the partnership as a whole and as far as is reasonably practicable, to support the objectives of the Woking Town Centre & Car parks CCTV System, (hereafter referred to as 'The System') and to outline how it is intended to do so.

#### 2.2 General Principles

- a) The System will be operated fairly, within applicable law, and only for the purposes for which it was established or which are subsequently agreed in accordance with this Code of Practice.
- b) The system will be operated with due regard to the principle that everyone has the right to respect for his or her private and family life and their home.
- c) The public interest in the operation of the system will be recognised by ensuring the security and integrity of operational procedures.
- d) Throughout this Code of Practice it is intended, as far as reasonably possible, to offer a balance between the objectives of the CCTV System and the need to safeguard the individual's right to privacy. Throughout the Code every effort has been made to indicate that a formal structure has been put in place, (including a complaints procedure) by which it should be identified that the System is not only accountable, but is seen to be accountable.
- e) Participation in the system by any local organisation, individual or authority assumes an agreement by all such participants to comply fully with this Code and to be accountable under the Code of Practice.

#### 2.3 Copyright

Copyright and ownership of all material recorded by virtue of the Woking Town Centre and Car Parks CCTV System will remain with the data controllers.



## 2.4 Cameras and Area Coverage

The areas covered by CCTV to which this Code of Practice refers are ***the town centre and car parks of Woking, the railway station, railway station car park in Oriental Road, Woking, a public footpath connecting these two areas, Sheerwater, West Byfleet village & Knaphill***. From time to time transportable or mobile cameras and recorders may be temporarily sited within the area. The use of such cameras, and the data produced by virtue of their use, will always accord with the objectives of the CCTV System.

Most of the cameras offer full colour, pan tilt and zoom (PTZ) capability. Some cameras (notably in the car parks) are fixed position. All cameras are designed to operate over 24 hours, including during low light conditions.

None of the cameras forming part of the System will be installed in a covert manner.

## 2.5 Monitoring and Recording Facilities

- a) A staffed monitoring and recording (control) room is located at Woking Police Station (3). The CCTV equipment records all public space cameras simultaneously throughout every 24 hour period.
- b) A monitoring and recording (control) room is also located in the Shoppers Car Park Complex. The CCTV equipment records all car park cameras simultaneously throughout every 24 hour period.
- c) CCTV operators are able to record images from selected cameras in real time, produce hard copies of the recorded images (video prints of recorded images), replay or copy any pre-recorded data at their discretion and in accordance with the Code of Practice and the Standard Operating Procedures Manual.
- d) All material is recorded digitally and all viewing and recording equipment shall only be operated by trained and authorised users.



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



### 2.6 Human Resources

Authorised persons will normally be present whenever the monitoring equipment is in use.

### 2.7 Processing and Handling of Recorded Material

All recorded material, whether recorded digitally, or as a hard copy video print, will be processed and handled strictly in accordance with this Code of Practice and the Standard Operating Procedures Manual.

### 2.8 Operators Instructions

The OR's agreed by the partnership for the system, together with relevant maps and plans are housed within the control rooms.

Technical instructions on the use of the monitoring equipment are also housed within the control rooms and are contained in a separate manual provided by the equipment installation and maintenance contractors, EMCOR Facilities Services Ltd.

### 2.9 Changes to the Code or the Standard Operating Procedures

- a) Any major changes to either the Code or the Standard Operating Procedures manual, (i.e. such as will have a significant impact upon the Code of Practice or upon the operation of the system) will take place only after consultation with all relevant interested groups, and upon the agreement of all organisations with a participatory role in the operation of the system.
- b) A minor change, (i.e. such as may be required for clarification and will not have such a significant impact) may be agreed between the operator and the owner of the system.

### 2.10 Exclusion of minor offences/certain types of behaviour

The system will not be used to prevent access to the Town Centre and Car Parks to those who have no criminal intent, but whose presence might offend against some "norm" of behaviour or "dress" (5).



## 2.11 Provision of Evidence

Recordings for evidential purposes shall be provided to the Police and also to the local authority for the investigation of specific matters itself e.g. racial and sexual harassment, intimidation, anti - social behaviour and threatening behaviour, fraud or enforcement of its statutory and regulatory functions within the town centre, car parks and other public space cctv areas within the borough. Recordings may also be provided to other bodies in accordance with the national standards for the release of data to third parties (see Appendix "A")

### Notes

- (1) *Article 8 of the Human Rights Act 1998 states that there shall be no interference by a public authority with the right to respect for private and family life except in the interests of matters such as national security, public safety and the prevention of crime & disorder.*
- (2) *The installation of a CCTV camera is considered to be overt unless it is installed in a manner whereby its presence is deliberately intended to be concealed from the view of any person likely to be within the field of view of that camera.*

**'Dummy' cameras are not used as part of the Woking CCTV System.**

- (3) *It is acknowledged that the Woking Town Centre and Car Parks system is designed to record images 24 hours, and therefore reference to a staffed control room must be qualified in that it does not imply that the system is staffed 24 hours; like the majority of CCTV systems in the UK, a fair degree of automation can be built into the monitoring equipment*

*It is also recognised that, in the interest of public scrutiny and accountability to the people being served by the CCTV, the partnership prefers the precise location of the Woking Town Centre & Car Parks control rooms to be included within the text of this Code of Practice.*

- (4) *The Woking Town Centre & Car Parks system is registered under data protection legislation. The term '**Processing**' includes the actual **obtaining** of data. The definition, in full, is reproduced as follows:*

*'Processing', in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:-*



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



- (a) *Organisation, adaptation or alteration of the information or data,*
  - (b) *Retrieval, consultation or use of the information or data,*
  - (c) *Disclosure of the information or data by transmission, dissemination or otherwise making available, or*
  - (d) *Alignment, combination, blocking, erasure or destruction of the information or data.*
- (5) *Any relevant local authority or police enforcement and regulatory functions will continue to apply.*



## Privacy and Data Protection

### 3.1 Public Concern

- a) Although the majority of the public at large may have become accustomed to 'being watched', those who do express concern do so mainly over matters pertaining to the processing of the information, (or data) i.e. what happens to the material that is obtained.

**NB:** '**Processing**' means **obtaining, recording or holding** the information or data or **carrying out any operation or set of operations** on the information or data, including;

- i) Organisation, adaptation or alteration of the information or data;
  - ii) Retrieval, consultation or use of the information or data;
  - iii) Disclosure of the information or data by transmission, dissemination or otherwise making available, or
  - iv) Alignment, combination, blocking, erasure or destruction of the information or data.
- b) All personal data obtained by virtue of the Woking Town Centre & Car Parks CCTV System, shall be processed fairly and lawfully and, in particular, shall only be processed in the exercise of achieving the stated objectives of the system. In processing personal data there will be total respect for everyone's right to respect for his or her private and family life and their home.

### 3.2 Data Protection Legislation

The Woking Town Centre & Car Parks CCTV System is registered with the office of the Data Protection Commissioner; with Woking Borough Council & Surrey Police being nominated as the data controllers.



### 3.3 Request for information (subject access)

- a) Any request from an individual for the disclosure of personal data which he/she believes is recorded by virtue of the system will be directed to the data controllers.
- b) The principles of Sections 7 and 8 of the Data Protection Act 1998 (Rights of Data Subjects and Others) should be followed in respect of every request, those Sections are reproduced as Appendix "E" to this code.

### 3.4 Exemptions to the Provision of Information

In considering a request made under the provisions of Section 7 of the Data Protection Act 1998, reference may also be made to Section 29 of the Act which includes, but is not limited to, the following statement:

Personal data processed for any of the following purposes -

- i) the prevention or detection of crime
- ii) the apprehension or prosecution of offenders

are exempt from the subject access provisions in any case 'to the extent to which the application of those provisions to the data, would be likely to prejudice any of the matters mentioned in this subsection'.

**NB Each and every application will be assessed on its own merits and general 'blanket exemptions' will not be applied.**

### 3.5 Criminal Procedures and Investigations Act, 1996

The Criminal Procedures and Investigations Act, 1996 came into effect in April, 1997 and introduced a statutory framework for the disclosure to defendants of material which the prosecution would not intend to use in the presentation of its own case, (known as unused material). An explanatory summary of the provisions of the Act is contained within the Standard Operating Procedures, but disclosure of unused material under the provisions of this Act should not be confused with the obligations placed on the data controller by Section 7 of the Data Protection Act 1998, (known as subject access).



## Accountability and Public Information

### Section 4

#### 4.1 The Public

- a) For reasons of security and confidentiality, access to the CCTV control rooms is restricted in accordance with this Code of Practice. However, in the interest of openness and accountability, anyone wishing to visit the rooms may be permitted to do so, subject to the approval of, and after making prior arrangements with, the owners and/or operators of the System. If the operator feels that for operational reasons, a visitor should be denied access, the decision must be referred to the CCTV Manager, who will assess the reasons and deal directly with the visitor at the same time and a written entry made in the log as to why access has been denied.
- b) Cameras will not be used to look into private residential property. The system is designed to meet specific operational requirements (copies of which are held at Woking Police Station and the Civic Offices, Woking Borough Council). In addition, 'Privacy zones' may be programmed into the system as required in order to ensure that the interior of any private residential or commercial property within range of the system is not surveyed by the cameras. In any event there is a stated OR document and plan for each camera.
- c) A member of the public wishing to register a complaint with regard to any aspect of the Woking Town Centre & Car Parks CCTV System may do so by contacting, either

**The Chief Executive  
Woking Borough Council  
Civic Offices  
Gloucester Square  
Woking  
Surrey, GU21 1YL**

or

**The Divisional Commander  
Surrey Police  
Station Approach  
Woking  
Surrey**

Any such complaint will be dealt with in accordance with existing discipline rules and regulations to which all members of Woking Borough Council and Surrey Police, including the CCTV operators, are subject. An individual who suffers damage or distress, by reason of any contravention of this Code of Practice, may be entitled to compensation from the System owner or operator.



# WOKING BOROUGH COUNCIL

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### 4.2 System owner

- a) The Woking Borough Council nominees at **Schedule 2**, being the nominated representative/s of the system owners, will have unrestricted personal access to the CCTV control rooms and will be responsible for receiving regular and frequent reports from the operators of the system.
- b) Woking Borough Council nominates the Environmental Programme Board with the specific responsibility for considering Policy & Performance Review issues arising from those reports.
- c) Formal consultation will take place between the owners and the operators of the system with regard to all aspects, including this Code of Practice and the Standard Operating Procedures.

### 4.3 System operator

- a) The Surrey Police nominees at **Schedule 2**, will have day-to-day responsibility for the operation of the system, through the Standard Operating Procedures.
- b) The system will be audited by the owner, through an independent accreditation system recognised by both partners.
- c) The partnership jointly agrees to exchange details of each and every complaint received. The partnership also jointly agrees to ensure that every complaint is acknowledged in writing within seven working days which will include advice to the complainant of the enquiry procedure to be undertaken. A formal six monthly report will be exchanged by the nominees of the system owner and operator, named at appendix A, giving details of all complaints and the outcome of relevant enquiries.
- d) Statistical and other relevant information, including any complaints made, will be included in an Annual Report which will be prepared by the owner and submitted to the Environment Programme Board of Woking Borough Council and to the Surrey Police Authority and operators and which will be made publicly available.

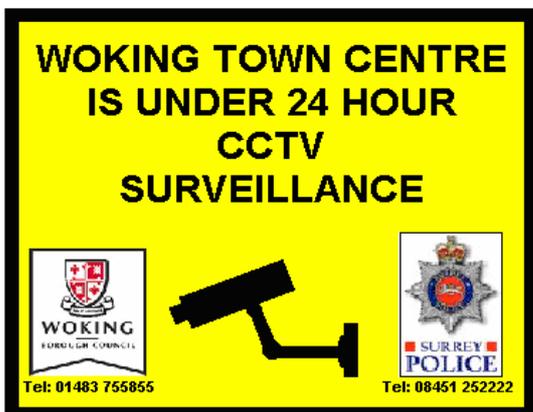


#### 4.4 Public Information

- a) Code of Practice: A copy of this Code of Practice will be made available to anyone requesting it. Additional copies will be lodged at Woking public libraries, Woking police station, Shoppers Car Park Complex and the Civic Offices, Woking Borough Council. The availability of the code will be publicised through the provision of notices.
- b) Annual Report: A copy of the annual report will also be made available to anyone requesting it. Additional copies will be lodged as in (a) above. Again, the availability of the report will be publicised through the provision of notices.
- c) Signs: Signs will be placed at main entrance points to the areas covered by CCTV and at other key points, like car parks. The signs will indicate:
  - i) The presence of CCTV monitoring.
  - ii) The 'ownership' of the system, through use of recognisable logos, which will facilitate contact with the owner and or operator.
  - iii) The telephone numbers of both owners and operators of the system.

The purpose and presence of signs is to inform the public that cameras are in operation and allow people entering the area to make a reasonable assessment of the area covered by the scheme.

- d) The Annual Report and the code of practice will be made available to anyone requesting it. Additional copies will be available at all WBC Offices throughout the borough.





## **Assessment of the System and Code of Practice**

### **5.1 Evaluation**

The owner of the system, Woking Borough Council will be responsible for ensuring that the Woking Town Centre and Car Parks Closed Circuit Television System will periodically be independently evaluated to establish whether the purposes of the system are being complied with and whether the broad objectives, or any specific objectives set through the Community Safety Strategy are being achieved. The evaluation will incorporate such things as (*for example, but not limited to*):

- i) An assessment of the impact upon crime*
- ii) An assessment of the impact on town centre business*
- iii) An assessment of neighbouring areas without CCTV*
- iv) The views and opinions of the public (including fear of crime)*
- v) The operation of the Code of Practice*
- vi) Whether the purposes for which the system was established are still relevant*
- vii) Cost effectiveness*

The results of the evaluation will be published and will have a bearing on the future functioning, management and operation of the system.

*(It is expected that evaluations should take place at least every two years)*

### **5.2 Monitoring**

The system owner and operator will accept day to day responsibility for the joint monitoring, operation and evaluation of the system and the implementation of this Code of Practice through an officer group with the remit to continuously evaluate the scheme.



# WOKING BOROUGH COUNCIL

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### 5.3 Audit

The **Chief Executive, Woking Borough Council** or his nominated deputy, who is not the system operator, will be responsible for regularly auditing the operation of the system and the compliance with this Code of Practice. Audits, (which may be in the form of irregular spot checks) will include examination of the control room records, CDs / DVDs and/or tape and video print histories and the content of recorded material.

### 5.4 Inspection

- a) A group of two or more Borough Councillors, elected representatives of the police authority and individuals appointed from the Citizens Panel,\* who have no direct contact with the system will be responsible for inspecting the operation of the system.
- b) Inspections should take place at least six times per calendar year by no more than (*two*) people at any one time. The inspectors will be permitted access to the CCTV control rooms, without prior notice and to the records held therein at any time, provided their presence does not disrupt the operational functioning of the room ( see section 4, 1 (a)). Their findings will be reported to the Auditor and their visit recorded in the CCTV monitoring room.
- c) Inspectors will be required to sign a declaration of confidentiality (see Appendix "C")

**Notes:** The Citizens Panel is a recognised mechanism for “engaging” the public. This inspectorate is a vital part of public scrutiny and resources will be provided for proper training and education on all relevant aspects of the system.



## Human Resources

## Section 6

### 6.1 Staffing of the Control Room

- a) The CCTV Control Room at Woking Police Station will be staffed in accordance with the Standard Operating Procedures. Equipment associated with the CCTV System will only be operated by authorised personnel who will have been properly trained in its use and all monitoring room procedures. Each operator will be personally issued with a copy of both the codes of practice and the Standard Operating Procedures manual. They will be fully conversant with the contents of both documents, which may be updated from time to time, and which he / she will be expected to comply with as far as is reasonably practicable at all times.
- b) Arrangement may be made for a police/council liaison officer to be present in the monitoring rooms at certain times, or indeed at all times, subject to locally agreed protocols. Any such person will also be conversant with these Codes of Practice and associated Standard Operating Procedures.

### 6.2 Discipline

- a) Every individual with any responsibility under the terms of this Code of Practice and who has any involvement with the CCTV System to which they refer, will be subject to the relevant discipline code of either Woking Borough Council or Surrey Police. Any breach of this Codes of Practice or of any aspect of confidentiality will be dealt with in accordance with those discipline rules.
- b) The system Owner/Operator will accept primary responsibility for ensuring there is no breach of security and that the Code of Practice is complied with. He/She has day to day responsibility for the management of the rooms and for enforcing the discipline rules. Non-compliance with this Code of Practice by any person will be considered a severe breach of discipline and dealt with accordingly including, if appropriate, the instigation of criminal proceedings.



## 6.3 Declaration of Confidentiality

Every individual with any responsibility under the terms of this Code of Practice and who has any involvement with the CCTV System to which they refer, will be required to sign a declaration of confidentiality. (See example at appendix C, see also Section 8 concerning access to the control rooms by others).

## Section 7

# Control and Operation of Cameras

## 7.1 Guiding Principles

- a) Any person operating the cameras will act with utmost probity at all times.
- b) Every use of the cameras will accord with the purposes and key objectives of the system and shall be in compliance with this Code of Practice.
- c) Cameras will not be used to look into private residential or commercial property. OR's have been agreed for the system and operators will act within the defined areas at all times. If necessary, 'Privacy zones' may be programmed into the system as required in order to ensure that the interior of any private residential property within range of the system is not surveyed by the cameras (1).
- d) Camera operators will be mindful of exercising prejudices which may lead to complaints of the system being used for purposes other than those for which it is intended. The operators may be required to justify their interest in, or recording of, any particular individual, group of individuals or property at any time by virtue of the audit of the system or by the system owner /operator.

## 7.2 Primary Control

Only those authorised members of staff with responsibility for using the CCTV equipment will have access to the operating controls in the CCTV control rooms, those operators have primacy of control at all times.



## Section 8

### **Access to, and Security of, Control Room (and/or) Associated Equipment**

#### **8.1 Authorised Access**

Only authorised personnel will operate any of the equipment located within the CCTV control rooms, *(or equipment associated with the CCTV System)*.

#### **8.2 Public access**

Public access to the monitoring and recording facility will be prohibited except for lawful, proper and sufficient reasons and only then with the personal authority of the system owner or operator. Any such visits will be conducted and recorded in accordance with the Standard Operating Procedures.

#### **8.3 Authorised Visits**

Visits by inspectors or auditors do not fall into the scope of the above paragraph and may take place at any time, without prior warning. No more than *two* inspectors or auditors will visit at any one time. Inspectors or Auditors will not influence the operation of any part of the system during their visit. The visit will be suspended in the event of it being operationally inconvenient. Any such visit should be recorded in the same way as that described above.

#### **8.4 Declaration of Confidentiality**

Regardless of their status, all visitors to the CCTV monitoring room, including inspectors and auditors, will be required to sign the visitor's book and a declaration of confidentiality.

#### **8.5 Security**

Authorised personnel will normally be present at all times when the equipment is in use. If the monitoring facility is to be left unattended for any reason it will be secured. In the event of the monitoring room having to be evacuated for safety or security reasons, the provisions of the Standard Operating Procedures will be complied with.



## Management of Recorded Material

### 9.1 Guiding Principles

- a) For the purposes of this Code 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the Woking Town Centre & Car Parks Closed Circuit Television System, but specifically includes images recorded digitally, or on videotape by way of copying, including video prints.
- b) Every recording used in conjunction with the Woking Town Centre & Car Parks CCTV System has the potential of containing material that has to be admitted in evidence at some point during its life span.
- c) Members of the community must have total confidence that information recorded about their ordinary every day activities by virtue of the system, will be treated with due regard to their individual right to respect for their private and family life.
- d) It is therefore of the utmost importance that every means of recording images is treated strictly in accordance with this Code of Practice and the Standard Operating Procedures from the moment it is delivered to the CCTV control room until its final destruction. Every movement and usage will be meticulously recorded.
- e) Access to, and the use of, recorded material will be strictly for the purposes defined in this Code of Practice only.
- f) Recorded material will not be copied, sold, otherwise released or used for commercial purposes or for the provision of entertainment.

### 9.2 National standard for the release of data to a third party

- a) Every request for the release of personal data generated by this CCTV System will be channelled through the data controllers. They will ensure the principles contained within Appendix E to this Code of Practice are followed at all times.
- b) In complying with the national standard for the release of data to third parties, it is intended, as far as reasonably practicable, to safeguard the individual's rights to privacy and to give effect to the following principles:



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- i) Recorded material shall be processed lawfully and fairly, and used only for the purposes defined in this Code of Practice;
  - ii) Access to recorded material will only take place in accordance with the standards outlined in Appendix "A" and this Code of Practice;
  - iii) The release or disclosure of data for commercial or entertainment purposes is specifically prohibited.
- c) Members of the police service or other agency having a statutory authority to investigate and/or prosecute offences may, subject to compliance with Appendix "A", release details of recorded information to the media only in an effort to identify alleged offenders or potential witnesses. Under such circumstances, full details will be recorded in accordance with the Standard Operating Procedures.

**Note:** *Release to the media of recorded information, in whatever format, which may be part of a current investigation would be covered by the Police and Criminal Evidence Act, 1984. Any such disclosure should only be made after due consideration of the likely impact on a criminal trial. Full details of any media coverage must be recorded and brought to the attention of both the prosecutor and the defence.*

- d) If material is to be shown to witnesses, including police officers, for the purpose of obtaining identification evidence, it must be shown in accordance with Appendix "A" and the Standard Operating Procedures.
- e) It may be beneficial to make use of 'real' footage for the training and education of those involved in the operation and management of CCTV systems, and for those involved in the investigation, prevention and detection of crime. Any material recorded by virtue of this CCTV system will only be used for such bona fide training and education purposes. Recorded material will not be released for commercial or entertainment purposes.



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### 9.3 Media/Data - Provision & Quality

To ensure the quality of the data, and that recorded information will meet the criteria outlined by current Home Office guide lines, the only recording Media to be used with the system are those which have been specifically provided in accordance with the Standard Operating Procedures.

### 9.4 Data - Retention

Recorded data will be retained for a period of 31 days, (*a minimum of 28 days is recommended*), on the recording media. At the end of this period, data will be automatically overwritten. Unless required for an investigation.

### 9.5 Tape Register

Not in use

### 9.6 Recording Policy

Subject to the equipment functioning correctly, images from every camera will be recorded throughout every 24 hour period<sup>(1)</sup> in time-lapse mode<sup>(2)</sup>, through digital multiplexers onto Computer Hard Drives. Images from selected cameras will be recorded in real time at the discretion of the CCTV operators or as directed by the Supervising Officers.

### 9.7 Evidential Tapes

Not in use



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### Section 10

## Video Prints

### Guiding Principles

- a) A video print is a copy of an image or images which already exist on recorded data. Video prints will not be taken as a matter of routine. Each time a print is made it must be capable of justification by the originator who will be responsible for recording the full circumstances under which the print is taken in accordance with the Standard Operating Procedures.
- b) Video prints contain data and therefore will only be released under the terms of Appendix "A" to this Code of Practice, 'Release of data to third parties'. If prints are released to the media, (in compliance with Appendix "A"), in an effort to identify alleged offenders or potential witnesses, full details will be recorded in accordance with the Standard Operating procedures.
- c) A record will be maintained of all video print productions in accordance with the Standard Operating Procedures. The recorded details will include; a sequential number; the date, time and location of the incident; date and time of the production of the print and the identity of the person requesting the print (if relevant).



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## Schedule 1

### Location of Cameras

Cam. Nos.	Location	Town
01	Mercia Walk / Commercial Way	<b>Woking</b>
02	Town square / adj. Barclays Bank	Woking
03	Library adj. Civic Offices	Woking
04	Gloucester Square	Woking
05	Civic Offices – Rear Staff Exit	Woking
06	Christchurch Way / East Street	Woking
07	Victoria Way / opp. Chobham Road + 2 x ANPR	Woking
08	Victoria Way Subway – North Side	Woking
09	Victoria Way Subway – South Side	Woking
10	Victoria Way Subway – South Side to Steps	Woking
11	Victoria Way Subway – South Side to Subway	Woking
12	Victoria Way / Chobham Road + 1 x ANPR	Woking
13	Church Street East	Woking
14	BHS / Crown Square – adj. Planets	Woking
15	BHS / Church Street East - adj. Church Path	Woking
16	Commercial Way – adj. Harpers	Woking
17	Church Path – rear of Harpers	Woking
18	Church St. East – Adjacent Town Square	Woking
19	Church St. East – Midway Old Market Area	Woking
20	Church St. East – Adjacent Burger King	Woking
21	Peacocks Shopping Mall Entrance – adj. Toys 'R' Us	Woking
22	Toys 'R' Us Car Park, Level2 – above Band stand	Woking
23	Victoria Way Traffic Island – opp. Fire Station	Woking
24	Rear of Toys 'R' Us Car Park – adj. Victoria Way	Woking
25	Post Office Wall – overlooking Market square	Woking
26	Market Sq. corner of High St. & Cawsey Way	Woking
27	High Street / Chapel Street Junction	Woking
28	Commercial Way – adj. Robert Dyas Store	Woking
29	Commercial Way – adj. Argos Superstore	Woking
30	High St./ Church Path Junction – adj. Nat West Bank	Woking
31	Chertsey Rd., opp. Albion Hse. – Albion Square	Woking
32	SW Trains Entrance – opp. Albion Square	Woking
33	The Broadway / Locke Way Junction	Woking
34	Locke Way – adjacent Public Toilets	Woking
35	Locke Way Car Park – adjacent Addison Road	Woking



# WOKING BOROUGH COUNCIL

In partnership with Surrey Police



(continued)

Cam. Nos.	Location	Town
36	Duke Street – opposite Locke Way	Woking
37	Duke Street / Chertsey Road Junction	Woking
38	Chertsey Rd. / Chobham Rd. Junction	Woking
39	Church St. East – adj. Quake Night Club	Woking
40	Victoria Way – adj. Ramp to Shoppers Car Park	Woking
41	Commercial Way – adj. Boots Pharmacy	Woking
42	SW Trains Subway – Albion Square End	Woking
43	SW Trains Subway – Albion Square End	Woking
44	SW Trains Subway – Mid Underpass	Woking
45	SW Trains Subway – Station Approach End	Woking
46	SW Trains Subway – Station Approach End	Woking
47	SW Trains Subway – Station Approach End	Woking
48	SW Trains Entrance – Station approach End	Woking
49	SW Trains Footpath – Looking towards Station	Woking
50	SW Trains Footpath – Towards Oriental Road	Woking
51	SW Trains Footpath – adj. Oriental Rd. Car Park	Woking
52	SW Trains Footpath – adj. Oriental Rd. Car Park	Woking
53	Crown Square – adj. O’Neils Public House	Woking
54	Church St. East / Chertsey Rd. Roundabout	Woking
55	Link Bridge – Vic. Way Car Park to HG Wells	Woking
56	Church St. West – adj. Bandstand, opp. Toys’R’Us	Woking
57	Albion Square – Beneath Canopy	Woking
58	High St. opp. Nat West Bank – adj. SW Trains ent.	Woking
80	Corner of Old Woking Road and The Close	West Byfleet
81	Old Woking Rd./Station App./Pyrford Rd. Junction	West Byfleet
82	Old Woking Rd./Station App./Pyrford Rd. Junction	West Byfleet
83	Old Woking Rd./Station App./Pyrford Rd. Junction	West Byfleet
84	Old Woking Rd./Station App./Pyrford Rd. Junction	West Byfleet
85	Old Woking Rd./Station App./Pyrford Rd. Junction	West Byfleet
86	Ped. Entrance to Rec. Gnd. – adj. Fence Line	West Byfleet
87	Ped. Entrance to Rec. Gnd. – adj. Fence Line	West Byfleet
88	Parvis Rd. Fence Line – adj. Tennis Court	West Byfleet
89	Camphill Rd. Fence Line – adj. Bowling Green	West Byfleet
90	Madeira Rd./ Lav. Park Rd. – adj. Restaurant	West Byfleet
91	Station Approach – adj. Supermarket Car Park	West Byfleet
92	Station Approach Traffic Island – adj. Pick-up area	West Byfleet
93	Railway Subway – adj. South Entrance	West Byfleet



# WOKING BOROUGH COUNCIL

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(continued)

Cam. Nos.	Location	Town
94	Railway Subway – adj. North Entrance	West Byfleet
95	Railway Fence Line – opp. Elec. Sub Station	West Byfleet
96	Woodlands Ave. Green – opp. Claremont Pub.H	West Byfleet
97	Woodlands Ave. Island – opp. Car Park Entrance	West Byfleet
98	Woodlands Ave. Green – opp. Birchwood Road	West Byfleet
99	Woodlands Ave. Green – opp. Birchwood Road	West Byfleet
103	Running Track – Far Side	<b>Sheerwater</b>
104	Running Track – Near Side	Sheerwater
105	Play Ground – in Rec.	Sheerwater
106	Community centre and Car Park	Sheerwater
107	Health Centre – Devonshire Avenue	Sheerwater
108	Devonshire Ave./ Bunyard Drive Junction	Sheerwater
109	Rear of Shops – Birch & Pine	Sheerwater
110	Rear of Shops – Post Office (Martinis)	Sheerwater
111	Front of Shops – Birch & Pine	Sheerwater
112	Front of Shops – Post Office (Martinis)	Sheerwater
113	Devonshire Ave./ Spencer Close Junction	Sheerwater
114	Dartmouth Ave./ Devonshire Ave. - Post Office End	Sheerwater
115	Devonshire Ave./ St. Michaels Road Junction	Sheerwater



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**(continued)**

<b>176 to 218</b>	All 8 levels of the Multi-Story car park – including Stair Wells.	<b>Victoria Way Car Park</b>
<b>219 to 228</b>	All levels of the Multi-Story car park – not including Stair Wells.	<b>Heathside Road Car Park</b>
<b>230 to 232</b>	Open Space Car Park – West Byfleet	<b>Woodlands Avenue Car Park</b>
<b>233 to 240</b>	Open Space Car Park – Woking Town Centre	<b>Brewery Road Car Park</b>
<b>270 to 396</b>	All 10 levels of the Multi-Story car park – including Stair Wells.	<b>Toys 'R' Us Car Park (Red)</b>
<b>397 to 483</b>	All 4 levels of the Multi-Story car park – including Stair Wells.	<b>Peacocks Car Park (Blue)</b>
<b>484 to 559</b>	All 4 levels of the Multi-Story car park – including Stair Wells.	<b>Wolsey Place Car Park (Yellow)</b>



## Schedule 2

### Key Personnel and Responsibilities

#### (I) Ownership

Woking Borough Council  
Civic Offices  
Gloucester Square  
Woking  
Surrey GU21 1YL    Tel: 01483 755855

#### a) Responsibilities:

Woking Borough Council is the 'owner' of the system. The nominees, or "Supervising Officers", will be the points of reference on behalf of the owners. Their roles will include a responsibility to:

- i) Ensure the provision and maintenance of all equipment forming part of the Woking Town Centre & Car Parks CCTV System in accordance with contractual arrangements which the owners may from time to time enter into, and this code of practice.
- ii) Maintain close liaison with Operators.
- iii) Ensure the interests of Woking Borough Council and other organisations are upheld in accordance with the terms of this Code of Practice.
- iv) In partnership with Operators, agree to any changes required to the OR's approve proposed alterations and additions to the system, this Code of Practice or the Standard Operating Procedures.
- v) Appoint an auditor for the system.
- vi) Appoint representatives to serve as independent Inspectors of the system in accordance with the Code of Practice.
- vii) Prepare and publish an annual report, which will include an evaluation of the scheme as required by the Code of Practice.
- viii) Woking Borough Council operates cameras covering car parks and is a "data controller".



# WOKING BOROUGH COUNCIL

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## II Operation

Surrey Police  
NW Surrey Division  
Police Station  
Station Approach  
Woking, Surrey      Tel: 0845 125 2222

### a) Responsibilities:

Surrey Police is the 'operator' of the system and the 'data controller'. The CCTV manager will be in charge of the CCTV "Monitoring Officers" who will be the points of reference on behalf of the Operators. Their roles will include the responsibility to:-

- i) Maintain day to day operation of the system and supervise staff;
- ii) Accept responsibility for operating the system and for ensuring that this Code of Practice and Standard Operating Procedures are complied with;
- iii) Maintain direct liaison with the owners of the system.
- iv) Identify any new operational requirements and /or the need for changes to the agreed OR's. New OR's will be presented to the Supervising Officer in the form prescribed by the Home office for consideration by the council.



## Operational Procedures

### 1. Introduction

These Operational Procedures have been drawn up in conjunction with The Code which sets out minimum standards expected of all employees and authorised users managing and operating The System.

The efficient and legal operation of CCTV rests with the standards contained within The Code. It should be considered as a benchmark for good practice that will ensure accountability and command employee and public confidence.

The Code will be the principal document for the resolution of any difficulties or discrepancies that may arise from the operation of The System. The Code together with these Operational Procedures will be subject to amendment and updates as required.

It is the responsibility of all staff working on The System to ensure that at all times they adhere to the contents of these documents. These documents have been written against the legal requirements of the Human Rights Act 1998, the Data Protection Act 1998 and the Regulation of Investigatory Powers Act 2000.

It is incumbent upon all staff to draw to the attention of the Data Controller any departure from the terms of The Code or its related Operational Procedures.

#### a. **Operator Duties and Responsibilities**

The very nature of CCTV is that it poses an intrusive breach of an individual's privacy. The majority of those who visit or pass by cameras will do so without an understanding of the range and capability of the cameras. The Partnership recognises the very real position of trust that those who operate The System have.

In recognising the legal requirements of the Human Rights Act 1998, the Data Protection Act 1998 and the Regulation of Investigatory Powers Act 2000, the Partnership has sought to provide those who operate The System with clear guidance on their duties and responsibilities.



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### b. Purposes of the System

The System must not be used for any purpose other than those defined in The Code. Any failure to follow The Code will result in disciplinary action being taken against members of staff. In the context of the defined purposes of The System the cameras can be used in the detection of criminal activity as well as for the safety of people visiting and working in the area immediately covered by the camera.

### c. System Integrity

The CCTV Operators should have regard for the safety and well being of those using the areas covered by the cameras. In particular the individual's right to privacy must not be unduly infringed. To this end all Operators are required to:

- sign a Declaration of Confidentiality that will remain in force throughout their period of employment;
- undergo a period of training on the operation of The System and its related procedures;
- know the contents of The Code and these Operating Procedures;
- participate in regular assessments of The System that will include monitoring, auditing and inspection of both the output of The System and the associated written documentation. These processes are set out in The Code;
- be aware at all times of the potential abuse there may be in operating The System e.g. looking into private areas such as office windows or people in their vehicles, unless such actions are justified through prior information;
- attend Court as required to support evidence that might have been gathered in the course of their duties.



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### d. Selection and Recruitment

- The CCTV monitoring equipment is located within the Control Room and Operators are selected and recruited specifically for the role of monitoring The System.
- Each Operator will be subject to a security vet and will be expected to demonstrate their understanding of and commitment to total confidentiality at all times.

### e. Training

The training required by a CCTV Operator will include company related information as well as technical and legal information. Operators will be provided with training in The System. They will be encouraged to undertake further training to industry-recognised standards. As such the Operators must know:

- the technical operation of The System including any training given by the equipment manufacturers and installers;
- how to interpret The Code and related Operational Procedures;
- the geographical location and coverage of every camera in The System;
- the legal issues surrounding privacy and potential contravention of the Human Rights Act 1998;
- attend a nominated training course to obtain a qualification suitable for a Security Authority Licence (SIA)
- the Data Protection Act 1998 and the Regulation of Investigatory Powers Act 2000.

### f. Discipline

- CCTV Operators will be subject to relevant discipline codes. Any breach of these Operational Procedures, The Code or confidentiality will be dealt with in accordance with those discipline regulations and staff must recognise that any such breach may amount to gross misconduct, which could lead to dismissal.



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- The Partnership will accept prime responsibility for ensuring that there is no breach of security and that The Code and Operational Procedures are complied with. Those having day-to-day responsibility for the management of the Control Room will also have responsibility for enforcing the discipline regulations.

### g. Welfare

All staff must know and understand their duties and commitment to Health and Safety. The Control Room staff must also understand the following information relating to staff welfare.

- Meal breaks will be taken in the rest area and Operators will be encouraged to take short tea/coffee breaks during their shift as appropriate.
- Staff monitoring The System will also take as a minimum, a 10 minute break for every one hour of monitoring.
- During periods of normal operation, staffs are not expected to leave The System unmonitored unless line management has given prior authorisation.
- The Partnership recognises that there may be occasions where Operators, through their normal course of duties, may witness scenes that they might find distressing or upsetting. There is local provision made for appropriate help to be available on a confidential basis to any staff member who feels they may require this service.

### h. Duties of an Operator

Duties and responsibilities within the Control Room will be co-ordinated by the Supervisor and may vary on a daily basis in order of priority as incidents occur.

### i. General Duties

- Keep a keen observation of The System's cameras.
- Maintain an accurate and up to date log of events and occurrences in the Daily Occurrence Log.
- Only allow authorised personnel into the Control Room.



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- Use initiative and resourcefulness to deal with any situations that may arise and utilise available staff to the best possible use.
- Carry out emergency procedures as directed in the relevant Emergency Procedures.

### **j. Responsibilities**

- Staff the Control Room at all times.
- Maintain a constant watch of the areas covered by The System.
- React promptly and correctly to warnings and indications given by any alarm systems installed ensuring that the action taken is logged.
- Record details of all significant occurrences in the relevant log.
- Answer all telephone calls in the correct manner and act upon them appropriately and efficiently.
- Control the entry of people to the Control Room and only allow authorised personnel entry into these areas.
- Maintain cleanliness and tidiness in the Control Room at all times.
- Use initiative and resourcefulness to deal with situations that may arise and utilise available staff to the best use possible.
- Ensure that all logs are kept up-to-date and information required is entered.
- Take charge of keys and issue them only to the authorised personnel as directed by the CCTV Officer.
- Ensure that correct and precise information is given to colleagues on handover.



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## 2. Operating Procedures

### a. Guiding Principles

- The Operators of the cameras and associated equipment will act with the utmost probity in the execution of their duty.
- Every use of the cameras shall accord with the purposes and key objectives of the scheme and shall comply with The Code and the Operational Procedures.
- Cameras will not be used to look into “private areas”. Operators have been specifically trained in privacy issues.
- Operators should beware of exercising prejudices that may lead to complaints of The System being used for which it is intended. The Operators may have to justify their interest in, or recording of, any particular individual, group of individuals or property at any time by virtue of the audit of The System.

### b. Observations

Operators should be alert, but not exclusively, to the following activity:

- Individuals acting suspiciously.
- Groups of people and unaccompanied or vulnerable children (especially under 8 years old).
- A person or persons being escorted against their will.
- Suspicious packages.
- A vehicle parked/broken down in a dangerous place.
- Police and other emergency vehicles (particularly at access points).



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### c. Specific Actions

- If an incident occurs that is of a criminal nature, inform the Police via the appropriate communications channel.
- If emergency services (fire, ambulance or other similar organisations) are required to attend the premises then call them via the appropriate communications channel.
- For all of the above, ensure that any recordings made are in “real time” and that the situation is closely monitored to ensure that the appropriate standard of images is recorded.
- If a criminal activity is suspected or being monitored, the Operator should try to zoom the camera in, to obtain an “identification” standard recording. Identification is where at least half of the subjects’ body fills the screen. After a good clear view has been obtained the Operator should zoom the camera out, to get a wider shot of the action. Wherever possible the subject(s) of the recording should be kept in the centre of the picture. Other cameras should be manoeuvred to obtain a recording from a different angle.
- All incidents should be recorded in the Occurrence Log even if the Police or other resources do not attend. The Operator will indicate on the Occurrence Log the resources attending and in what numbers.
- A Record of Occurrence form is to be completed in detail to compliment the entry in the Occurrence Log.

### d. Access to the Control Room

- Access to the Control Room is strictly controlled and only authorised persons are entitled to be in the Control Room. A list of those authorised to enter the Control Room is available at the site.
- Under no circumstances should anyone else be in the Control Room without authorisation from the CCTV Officer or designated deputy.
- Physical proof of ID and the visitor’s authorisation will be checked. Only when this is done will anyone be allowed entry into the Control Room.



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- Upon entry to the Control Room it is the Operator's responsibility to ensure that all visitors sign in and when leaving sign out, recording each visitor's name, time of entry and exit and purpose of visit.

### e. System Check

System Check forms are kept at the Control Room.

- At the takeover of duty, the Operator will carry out a functional test of all the cameras, checking that all of the operating functions are working correctly. The results of this test must be recorded on the System Check form provided and faxed through to the CCTV Officer.
- The Operator must fill in the form and describe any faults in detail.
- The Control Room Supervisor will inspect all forms on a daily basis and ensure that action is being taken to rectify the problem.
- Only copies of the System Check form can be removed from the Control Room. The original must remain at the Control Room.

### f. Recording Equipment

The System will record images digitally 24 hours per day, 7 days per week onto a Hard Disc. Images can be recorded onto CD Rom, or DVD.

### g. Evidence

The procedure in respect of recordings, which may contain evidence that will be required by the Police, is as follows:

- Designated Police Officers will request to view a recording based upon specific time and date parameters. Operators should ensure that all such viewing requests are done so by appointment.
- The Operator will view the recording along with the Police Officer based upon specific start and finish time and date. This viewing is recorded on an Internal Viewing Form.
- Should the material viewed be relevant to an on-going criminal investigation or specific court case, the Police Officer will request a copy of the recording. This request is logged onto the Internal Viewing Form.



# WOKING BOROUGH COUNCIL

In partnership with Surrey Police



- The relevant material will then be copied onto a new sealed CD Rom or DVD provided by the Police. If evidential, marked 'M' and a working copy 'A' made. If non evidential, data viewed must be disclosed on a 'U' disc as unused material.
- The recording should be clearly marked as evidence and sealed. Any copies required will be made from the 'A' disc. The Master will remain in the CCTV unit until the day of any required court proceedings. Copies should be released only when it has been signed for on the Evidential Tape Record and the Master Log Sheet of the Evidential Tape file is completed.
- Exactly this same procedure is followed in the event of a request from the Police Ombudsman to view any recordings from The System.

## **h. Provision of Services to the Media**

- Under no circumstances must CCTV Operators contact or speak to the media. (Media includes local radio, television, print journalists or related staff). If The Partnership has determined that you can speak to the media you will be given the appropriate authority and all the necessary information.
- Under no circumstances must you make any approaches to the media or discuss anything that you have seen or learnt through your employment as a CCTV Operator.

## **i. Emergency Procedures**

- If the need arises to evacuate the Control Room by virtue of either a security alert or fire alarm all staff will act in accordance with local instructions. If possible, and without risking the safety of any member of staff, the room should be secured on leaving. Any operations or procedures underway at the time of the evacuation should be abandoned.
- Upon returning to the room all systems should be checked to ensure that they are in proper working order and an appropriate entry should be made in the Daily Occurrence Log.



### **j. Data Protection Act 1998 – Subject Access Requests**

- The content of recordings made by The System is “Data”, and as such is covered by the Data Protection Act 1998. People who appear in recordings (Data Subjects) have the legal right to view any material in which they appear. However the right does not extend to some types of incidents or recordings. It is the responsibility of the Data Controller to grant access to recordings and all requests must be directed to the Data Controller in writing.
- If an Operator receives a request for access to images from anyone other than a recognised Police Officer or the CCTV Officer they must not discuss with them the contents of any recording observation made by The System.
- The Data Controller may require Operators to check recordings of specific incidents, but no non-authorised individuals must be present. The form, as designated in The Code, should be completed.
- Members of the public or others requesting access must be directed to the CCTV Officer or be asked to give their name, address and contact telephone number so that the CCTV Officer can send them the appropriate documents.

### **k. Requests for Observations**

- The appropriate form, as designated by The Code, should be used if a request is made of the Operator to look out for a particular incident or individual. If a known individual or group of known individuals is the subject of a request and the request comes from the “public authority” e.g. Police, local authority, Customs & Excise then the Regulation of Investigatory Powers Act 2000 may apply.
- Unless in “hot pursuit” of a suspect, which would make obtaining the necessary authority impractical, then all such observation requests must be accompanied by a written authority from an Authorising Officer. In the case of the Police, this will be an officer of the rank of Inspector or above and in the case of the Woking Borough Council this will be a recognised senior officer through the CCTV Officer.



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- In the event of a major event taking place e.g. political demonstration, sporting event, or other event that is likely to be the source of public disorder, the Police may request that a Police Officer be present in the Control Room for the duration of the event. The Officer needs to have written authority signed by a Chief Inspector or above, which details the duration of the Code of Practice for the Woking CCTV System event with specific start and finish times detailed on the form in order to be present in the Control Room. Approval for this will be given only after consultation with the CCTV Officer. (Code of Practice for the Woking CCTV System).



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### Schedule 4

## Complaints Procedure

The Council will actively seek to “ensure that all customers and users of the Council's services are aware of their right to be treated equally, with respect and dignity, and of their right to complain when they believe they have been unfairly treated.” [Source: The Woking Borough Council Equal Opportunities Policy]

**The Woking Borough Council aims to provide high quality services in line with the needs of our customers.**

Our staffs always try to provide you with a first class service in a polite, efficient and fair way. Despite our best efforts, there may be occasions when you are unhappy with something we have done, or have not done, or about a service we provide, if so, then please tell us about it so that we can try to put it right. We value any complaints that we receive and give you our assurance that your complaint will be thoroughly investigated.

### What do we mean by a Complaint?

A complaint can be broadly defined as: “any expression of dissatisfaction by a customer about the standard of service, actions or lack of actions by the council or its staff which has affected an individual or group.” So ..... If we fail to act on the request, we do it inadequately, or if we then fail to respond within a reasonable timescale and you have to write again or ring back, that is a complaint.

### How do I complain?

If the person you have been dealing with has been unable to provide a response that you consider satisfactory, or if you would like to register a formal complaint, you can refer to **Section 4**.



## Schedule 5

### Extracts from Data Protection Act 1998 and (Data Protection Principles)

#### Data Protection Code of Practice July 2000 Section 7

- (1) Subject to the following provisions of this section and to sections 8 and 9, an individual is entitled:
  - (a) to be informed by any Data Controller whether personal data of which that individual is the data subject are being processed by or on behalf of that Data Controller.
  - (b) if that is the case, to be given by the Data Controller a description of –
    - (i) the personal data of which that individual is the data subject;
    - (ii) the purpose for which they are being or are to be processed;
    - (iii) the recipients or classes of recipients to whom they are or may be disclosed,
  - (c) to have communicated to him/her in an intelligible form:
    - (i) the information constituting any personal data of which that individual is the data subject;
    - (ii) any information available to the Data Controller as the source of those data;
  - (d) where the processing by automatic means of personal data of which that individual is the data subject for the purposes of evaluating matters relating to him/her such as, for example, his/her performance at work, his/her creditworthiness, his/her reliability or his/her conduct, has constituted or is likely to constitute the sole basis for any decision significantly affecting him/her, to be informed by the Data Controller of the logic involved in that decision-taking,



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- (2) A Data Controller is not obliged to supply any information under subsection (1) unless he/she has received:
  - (a) a request in writing, and
  - (b) except in prescribed cases, such fee (not exceeding the prescribed maximum) as he/she may require.
- (3) A Data Controller is not obliged to comply with a request under this section unless he/she is supplied with such information as he/she may reasonably require in order to satisfy him/herself as to the identity of the person making the request and to locate the information which that person seeks.
- (4) Where a Data Controller cannot comply with the request without disclosing information relating to another individual who can be identified from that information, he/she is not obliged to comply with the request unless:
  - (a) the other individual has consented to the disclosure of the information to the person making the request, or
  - (b) it is reasonable in all the circumstances to comply with the request without the consent of the other individual.
- (5) In subsection (4) the reference to information relating to another individual includes a reference to information identifying that individual as the source of the information sought by the request; and that subsection is not to be construed as excusing the Data Controller from communicating so much of the information sought by the request as can be communicated without disclosing the identity of the other individual concerned, whether by omission of names or other identifying particulars or otherwise.
- (6) In determining for the purposes of subsection (4)(b) whether it is reasonable in all the circumstances to comply with the request without the consent of the other individual concerned, regard shall be had, in particular, to:
  - (a) any duty of confidentiality owed to the other individual,
  - (b) any steps taken by the Data Controller with a view to seeking the consent of the other individual,



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



- (c) whether the other individual is capable of giving consent, and
  - (d) any express refusal of consent by the other individual.
- (7) An individual making a request under this section may, in such cases as may be prescribed, specify that his/her request is limited to personal data of any prescribed description.
- (8) Subject to subsection (4), a Data Controller shall comply with a request under this section promptly and in any event before the end of the prescribed period beginning with the relevant day.
- (9) If a court is satisfied on the application of any person who has made a request under the forgoing provisions of this section that the data controller in question has failed to comply with the request in contravention of those provisions, the court may order him/her to comply with the request.

In this section:

‘prescribed’ means prescribed by the Secretary of State by regulations; ‘the prescribed maximum’ means such amount as may be prescribed; ‘the prescribed period’ means forty days or such other period as may be prescribed; ‘the relevant day’, in relation to a request under this section, means the day on which the data controller receives the request or, if later, the first day on which the data controller has both the required fee and the information referred to in subsection (3).

- (10) Different amounts or periods may be prescribed under this section in relation to different cases.

### Section 8

- (1) The Secretary of State may by regulations provide that, in such cases as may be prescribed, a request for information under any provision of subsection (1) of section 7 is to be treated as extending also to information under other provisions of that subsection.



# WOKING BOROUGH COUNCIL

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- (2) The obligation imposed by section 7(1) (c)(i) must be complied with by supplying the data subject with a copy of the information in permanent form unless:
  - (a) the supply of such a copy is not possible or would involve disproportionate effort, or
  - (b) the data subject agrees otherwise;
  - (c) and where any of the information referred to in section 7(1) (c) (i) is expressed in terms which are not intelligible without explanation the copy must be accompanied by an explanation of those terms.
- (3) Where a data controller has previously complied with a request made under section 7 by an individual, the data controller is not obliged to comply with a subsequent identical or similar request under that section by that individual unless a reasonable interval has elapsed between compliance with the previous request and the making of the current request.
- (4) In determining for the purposes of subsection (3) whether requests under section 7 are made at reasonable intervals, regard shall be had to the nature of the data, the purpose for which the data are processed and the frequency with which the data are altered.
- (5) Section 7(1) (d) is not to be regarded as requiring the provision of information as to the logic involved in decision-taking if, and to the extent that, the information constitutes a trade secret.
- (6) The information to be supplied pursuant to request under section 7 must be supplied by reference to the data in question at the time when the request is received, except that it may take account of any amendment or deletion made between that time and the time when the information is supplied, being an amendment or deletion that would have been made regardless of the receipt of the request.
- (7) For the purposes of section 7(4) and (5) another individual can be identified from the information being disclosed if he/she can be identified from that information, or from that and any other information which, in the reasonable belief of the data controller, is likely to be in, or to come into, the possession of the data subject making the request.

**Note:** These extracts are for guidance only. To ensure compliance with the legislation, the relevant Data Protection legislation should be referred to in its entirety.



## Data Protection Principles

### There are eight Data Protection Principles

#### ***THE FIRST: Data Protection Principle:***

This requires that

“Personal data shall be processed fairly and lawfully, and, in particular, shall not be processed unless:

- a) at least one of the conditions in Schedule 2 is met, and
- b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met”.

To assess compliance with this Principle, it is recommended that the data controller address the following questions:

#### **a) Are personal data and/or sensitive personal data processed?**

The definition of sensitive personal data has been discussed above and it is essential that the data controller has determined whether they are processing information/images, which fall into that category in order to assess which criteria to consider when deciding whether there is a legitimate basis for the processing of that information/images.

#### **b) Has a condition for processing been met?**

The First Data Protection Principle requires that the *data controller* have a legitimate basis for processing. It is for the data controller to be clear about which grounds to rely on in this respect. These are set out in Schedules 2 and 3 to the Act.

Users of schemes which monitor spaces to which the public have access, such as town centres, may be able to rely on Paragraph 5 (d) of Schedule 2 because the processing is for the exercise of any other function of a public nature exercised in the public interest by any person. This could include purposes such as prevention and detection of crime, apprehension and prosecution of offenders or public/employee safety.



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



Users of schemes which monitor spaces in shops or retail centres to which the public have access may be able to rely on Paragraph 6(l) of Schedule 2 because the processing is necessary for the purposes of legitimate interests pursued by the data controller or the third party or third parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject.

It should be noted that while this criterion may provide a general ground for processing, in an individual case, the interests of the data controller i.e. the user of the surveillance equipment might not outweigh the rights of an individual.

If the data controller has determined that he or she is processing sensitive personal data, then the data controller will also need to determine whether he or she has a legitimate basis for doing so under Schedule 3. It should be noted that Schedule 3 does not contain the grounds cited above in relation to Schedule 2.

Users of surveillance equipment in town centres, particularly where the local authority or police force (or a partnership of the two) are the data controllers may be able to rely on Paragraph 7(l) (b) of Schedule 3 because the processing is necessary for the exercise of any functions conferred on any person by or under an enactment. It may be that the use of such information/images by a public authority in order to meet the objectives of the Crime and Disorder Act 1998 would satisfy this criterion.

Users of information/images recorded in a shop or retail centre may be able to rely on one of the grounds contained in the Order made under Schedule 3(10) of the 1998 Act.

### **For example-**

(1) The processing:

- a) is in the substantial public interest;
- b) is necessary for the purposes of the prevention and detection of any unlawful act; and
- c) must necessarily be carried out without the explicit consent of the data subject so as not to prejudice those purposes”



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



It is for the data controller to be sure that he or she has legitimate grounds for their processing and therefore it is essential that the data controller has identified:

- what categories of data are processed, and
- why.

### c) Are the information/images processed lawfully?

The fact that the data controller has a legitimate basis for processing does not mean that this element of the First Data Protection Principle is automatically satisfied. The data controller will also need to consider whether the information/images processed are subject to any other legal duties or responsibilities such as the common law duty of confidentiality. Public sector bodies will need to consider their legal powers under administrative law in order to determine whether there are restrictions or prohibitions on their ability to process such data. They will also need to consider the implications of the Human Rights Act 1998.

### d) Are the information/images processed fairly?

The fact that a data controller has a legitimate basis for processing the information/images will not automatically mean that this element of the First Data Protection Principle is satisfied.

The interpretative provisions of the Act set out what is required in order to process fairly. In order to process fairly, the following information, at least, must be provided to the individuals at the point of obtaining their images:

- the identity of the data controller
- any information which is necessary, having regard to the specific circumstances in which the data are or are to be processed, to enable processing in respect of the individual to be fair.

### e) Circumstances in which the requirement for signs may be set aside

The Act does not make specific reference to the use of covert processing of (sensitive) personal data but it does provide a limited exemption from the requirement of fair processing. Because fair processing (as indicated above) requires that individuals are made aware that they are entering an area where their images may be captured, by the use of signs, it follows that the use of covert processing i.e. removal or failure to provide signs, is prima facie a breach of the fairness requirement of the First Data Protection Principle. However, a



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breach of this requirement will not arise if an exemption can be relied on. Such an exemption may be found at Section 29(l) of the Act, which states that:

“Personal data processed for any of the following purposes:

- a) prevention or detection of crime
- b) apprehension or prosecution of offenders

are exempt from the first data protection principle (except to the extent to which it requires compliance with the conditions in Schedules 2 and 3) ... in any case to the extent to which the application of those provisions to the data would be likely to prejudice any of the matters mentioned...”

This means that if the data controller processes images for either or both of the purposes listed in the exemption, he or she may be able to obtain and process images without signs without breaching the fairness requirements of the First Data Protection Principle.

### ***THE SECOND: Data Protection Principle***

This requires that

“Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes”. In order to ascertain whether the data controller can comply with this Data Protection Principle, it is essential that he or she is clear about the purpose(s) for which the images are processed.

Specified purposes may be those, which have been notified to the Commissioner or to the individuals.

There are a number of issues to be considered when determining lawfulness:

- Whether the data controller has a legitimate basis (see First Data Protection Principle) for the processing.
- Whether the images are processed in accordance with any other legal duties to which the data controller may be subject e.g. the common law duty of confidence, administrative law in relation to public sector powers etc.



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



It is quite clear from the interpretative provisions to the Principle that the requirement of compatibility is particularly significant when considering making a disclosure to a third party or developing a policy on disclosures to third parties. If the data controller intends to make a disclosure to a third party, regard must be had to the purpose(s) for which the third party may process the data.

This means, for example, that if the purpose(s) for which images are processed is:

- Prevention or detection of crime
- Apprehension or prosecution of offenders

The data controller may only disclose to third parties who intend processing the data for compatible purposes. Thus, for example, where there is an investigation into criminal activity, disclosure of footage relating to that criminal activity to the media in order to seek assistance from the public in identifying either the perpetrator, the victim or witnesses, may be appropriate. However, it would be an incompatible use if images from equipment installed to prevent or detect crime were disclosed to the media merely for entertainment purposes.

For example, it might be appropriate to disclose to the media images of drunken individuals stumbling around a town centre on a Saturday night to show proper use of policing resources to combat anti-social behaviour. However, it would not be appropriate for the same images to be provided to a media company merely for inclusion in a “humorous” video.

If it is determined that a particular disclosure is compatible with the purposes for which the data controller processes images, then the extent of disclosure will need to be considered. If the footage, which is to be disclosed, contains images of unrelated third parties, the data controller will need to ensure that those images are disguised in such a way that they cannot be identified.

If the data controller does not have the facilities to carry out such editing, he or she may agree with the media organisation that it will ensure that those images are disguised. This will mean that the media organisation is carrying out processing, albeit of a limited nature on behalf of the data controller which is likely to render it a data processor. In which case the data controller will need to ensure that the relationship with the media organisation, complies with the Seventh Data Protection Principle.



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### ***THE THIRD: Data Protection Principle***

This requires that

“Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed”. This means that consideration must be given to the situation of the cameras so that they do not record more information than is necessary for the purpose for which they were installed.

For example cameras installed for the purpose of recording acts of vandalism in a car park should not overlook private residences. Furthermore, if the recorded images on the tapes are blurred or indistinct, it may well be that this will constitute inadequate data. For example, if the purpose of the system is to collect evidence of criminal activity, blurred or indistinct images from degraded tapes or poorly maintained equipment will not provide legally sound evidence, and may therefore be inadequate for its purpose.

### ***THE FOURTH: Data Protection Principle***

This requires that

“Personal data shall be accurate and, where necessary, kept up to date”.

This principle requires that the personal information that is recorded and stored must be accurate. This is particularly important if the personal information taken from the system is to be used as evidence in cases of criminal conduct or in disciplinary disputes with employees.

The Commissioner recommends that efforts are made to ensure the clarity of the images, such as using only good quality tapes in recording the information, cleaning the tapes prior to re-use and not simply recording over existing images, and replacing tapes on a regular basis to avoid degradation from over-use.

If the data controller’s system uses features such as time references and even location references, then these should be accurate. This means having a documented procedure to ensure the accuracy of such features is checked and if necessary, amended or altered.

Care should be exercised when using digital-enhancement and compression technologies to produce stills for evidence from tapes because these technologies often contain pre-programmed presumptions as to the likely nature of sections of the image. Thus the user cannot be certain that the images taken from the tape are an



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accurate representation of the actual scene. This may create evidential difficulties if they are to be relied on either in court or an internal employee disciplinary hearing.

### ***THE FIFTH: Data Protection Principle***

This requires that

“Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes”. This principle requires that the information shall not be held for longer than is necessary for the purpose for which it is to be used. The tapes that have recorded the relevant activities should be retained until such time as the proceedings are completed and the possibility of any appeal has been exhausted. After that time, the tapes should be erased. Apart from those circumstances, stored or recorded images should not be kept for any undue length of time. A policy on periods for retention of the images should be developed which takes into account the nature of the information and the purpose for which it is being collected.

For example where images are being recorded for the purposes of crime prevention in a shopping area, it may be that the only images that need to be retained are those relating to specific incidents of criminal activity; the rest could be erased after a very short period. Commissioner understands that generally town centre schemes do not retain recorded images for more than 28 days unless the images are required for evidential purposes.

### ***THE SIXTH: Data Protection Principle***

This requires that

“Personal data shall be processed in accordance with the rights of data subjects under this Act”. The Act provides individuals with a number of rights in relation to the processing of their personal data. Contravening the following rights will amount to a contravention of the Sixth Data Protection Principle:

- The right to be provided, in appropriate cases, with a copy of the information constituting the personal data held about them - Section 7.
- The right to prevent processing that is likely to cause damage or distress - Section 10.
- Rights in relation to automated decision-taking - Section 12



### ***THE SEVENTH: Data Protection Principle***

This requires that

“Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data”.

In order to assess the level of security the data controller needs to take to ensure compliance with this Principle, he or she needs to assess: -

- the harm that might result from unauthorised or unlawful processing or accidental loss, destruction or damage of the personal data. While it is clear that breach of this Principle may have a detrimental effect on the purpose(s) of the scheme e.g. the evidence or images might not stand up in court, or the public may lose confidence in your use of surveillance equipment due to inappropriate disclosure, the harm test required by the Act also requires primarily the effect on the people recorded to be taken into account;
- the nature of the data to be protected must be considered. Sensitive personal data was defined at the beginning of this part of the Code, but there may be other aspects, which need to be considered. For example, a town centre scheme may coincidentally record the image of a couple kissing in a parked car, or a retailer’s scheme may record images of people in changing rooms (in order to prevent items of clothing being stolen). Whilst these images may not fall within the sensitive categories as set in Section 2 (described above), it is clear that the people whose images have been captured will consider that information or personal data should be processed with greater care.

### ***THE EIGHTH: Data Protection Principle***

This requires that

“Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data”. This Principle places limitations on the ability to transfer personal data to countries and territories outside of the EEA. It is unlikely that the data controller would want, in general, to make such transfers of personal data overseas, but the data controller should refrain from putting the images on the Internet or on their website. In order to ensure that this Principle is not breached, the data controller should consider the provisions of Schedule 4 of the 1998 Act.



## Appendix A

### National Standard for the Release of Data to Third Parties

#### 1. Introduction

Arguably CCTV is one of the most powerful tools to be developed during recent years to assist with efforts to combat crime and disorder whilst enhancing community safety. Equally, it may be regarded by some as the most potent infringement of people's liberty. If users, owners and managers of such systems are to command the respect and support of the general public, the systems must not only be used with the utmost probity at all times, they must be used in a manner which stands up to scrutiny and is accountable to the very people they are aiming to protect.

Both partners are members of the National *CCTV User Group*. This group is committed to the belief that everyone has the right to respect for his or her private and family life and their home. Although the use of CCTV cameras has become widely accepted in the UK as an effective security tool, those people who do express concern tend to do so over the handling of the information (data) which the System gathers.

#### 2. General Policy

The owner and operator will agree a local procedure to ensure a standard approach to all requests for the release of data. Initially, every request will be channelled through the data controller or the partner receiving the request. Each partner will notify the other of requests when received and each request will be processed in accordance with the code of practice and local procedures.

**Note:** The **data controller** is the person who (either alone or jointly or in common with other persons) determines the purpose for which and the manner in which any personal data are, or are to be, processed. (In this case the data controller can be either the scheme owner or operator).



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## In partnership with Surrey Police



### 3. Primary Request to View Data

- a) Primary requests to view data generated by a CCTV System are likely to be made by third parties for any one or more of the following purposes:
  - i) Providing evidence in criminal proceedings (e.g. Police and Criminal Evidence Act 1984, Criminal Procedures & Investigations Act 1996, etc.);
  - ii) Providing evidence in civil proceedings or tribunals
  - iii) The prevention of crime
  - iv) The investigation and detection of crime (may include identification of offenders)
  - v) Identification of witnesses
- b) Third parties, which should be required to show adequate grounds for disclosure of data within the above criteria, may include, but are not limited to:
  - i) Police <sup>(1)</sup>
  - ii) Statutory authorities with powers to prosecute, (e.g. Customs and Excise; Trading Standards, etc.)
  - iii) Solicitors <sup>(2)</sup>
  - iv) Plaintiffs in civil proceedings<sup>(3)</sup>
  - v) Accused persons or defendants in criminal proceedings <sup>(3)</sup>
  - vi) Other agencies, (which are specified in annex 1 of this appendix) according to purpose and legal status<sup>(4)</sup>.
- c) Upon receipt from a third party of a bona fide request for the release of data, the scheme owner (or representative) should:
  - i) Not unduly obstruct a third party investigation to verify the existence of relevant data.



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- ii) Ensure the retention of data which may be relevant to a request, but which may be pending application for, or the issue of, a court order or subpoena, (it may be appropriate to impose a time limit on such retention which should be notified at the time of the request).
- d) In circumstances outlined at note (3) below, (requests by plaintiffs, accused persons or defendants) the owner, (or nominated representative) should:
  - i) Be satisfied that there is no connection with any existing data held by the police in connection with the same investigation.
  - ii) Treat all such enquiries with strict confidentiality.

### Notes

- (1) The release of data to the police may not be restricted to the civil police but could include, (for example) British Transport Police, Ministry of Defence Police, Military Police, etc.
- (2) Aside from criminal investigations, data may be of evidential value in respect of civil proceedings or tribunals. In such cases a solicitor, or authorised representative of the tribunal, should be required to give relevant information in writing prior to a search being granted. In the event of a search resulting in a requirement being made for the release of data, such release will only be facilitated on the instructions of a court order or subpoena. (It may be considered appropriate to make a charge for this service. In all circumstances data will only be released for lawful and proper purposes).
- (3) There may be occasions when an enquiry by a plaintiff, an accused person, a defendant or a defence solicitor falls outside the terms of disclosure or subject access legislation. An example could be the investigation of an alibi. Such an enquiry may not form part of a prosecution investigation. Defence enquiries could also arise in a case where there appeared to be no recorded evidence in a prosecution investigation.
- (4) The scheme owner should decide which (if any) "other agencies" might be permitted access to data. Having identified those 'other agencies', such access to data will only be permitted in compliance with this standard.



#### 4. Secondary Request to View Data

- a) A 'secondary' request for access to data may be defined as any request being made which does not fall into the category of a primary request. Before complying with a secondary request, the scheme owner should ensure that:
- i) The request does not contravene, and that compliance with the request would not breach, current relevant legislation, (e.g. Data Protection, section 163 Criminal Justice and Public Order Act 1994, etc.);
  - ii) Any legislative requirements have been complied with, (e.g. the requirements of the Data Protection Act);
  - iii) Due regard has been taken of any known case law (current or past) which may be relevant, (e.g. R v Brentwood BC ex p. Peck) and
  - iv) The request would pass a test of 'disclosure in the public interest'<sup>(1)</sup>.
- b) If, in compliance with a secondary request to view data, a decision is taken to release material to a third party, the following safeguards should be put in place before surrendering the material:
- i) In respect of material to be released under the auspices of 'crime prevention', written agreement to the release of the material should be obtained from a police officer, not below the rank of Inspector. The officer should have personal knowledge of the circumstances of the crime/s to be prevented and an understanding of the CCTV System Code of Practice<sup>(2)</sup>.
  - ii) If the material is to be released under the auspices of 'public well being, health or safety', written agreement to the release of material should be obtained from a senior officer within the Local Authority. The officer should have personal knowledge of the potential benefit to be derived from releasing the material and an understanding of the CCTV System Code of Practice.



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- c) Recorded material may be used for bona fide training purposes such as police or staff training. Under no circumstances will recorded material be released for commercial sale of material for training or entertainment purposes.

### Notes

- (1) 'Disclosure in the public interest' could include the disclosure of personal data that:
  - i) provides specific information which would be of value or of interest to the public well being
  - ii) identifies a public health or safety issue
  - iii) leads to the prevention of crime
- (2) The disclosure of personal data which is the subject of a 'live' criminal investigation would always come under the terms of a primary request, (see iii) above).

## 5. Individual Subject Access under Data Protection legislation

- a) Under the terms of Data Protection legislation, individual access to personal data, of which that individual is the data subject, must be permitted providing:
  - i) The request is made in writing;
  - ii) A specified fee is paid for each individual search;
  - iii) The Data Controller is supplied with sufficient information to satisfy him or her self as to the identity of the person making the request;
  - iv) The person making the request provides sufficient and accurate information about the time, date and place to enable the data controller to locate the information which that person seeks, (it is recognised that a person making a request is unlikely to know the precise time. Under those circumstances it is suggested that within one hour of accuracy would be a reasonable requirement);



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- v) The person making the request is only shown information relevant to that particular search and which contains personal data of her or him self only, unless all other individuals who may be identified from the same information have consented to the disclosure;
- b) In the event of the scheme owner complying with a request to supply a copy of the data to the subject, only data pertaining to the individual should be copied, (all other personal data which may facilitate the identification of any other person should be concealed or erased). Under these circumstances an additional fee may be payable.
- c) The owner is entitled to refuse an individual request to view data under these provisions if insufficient or inaccurate information is provided, (However every effort should be made to comply with subject access procedures and each request should be treated on its own merit).
- d) In addition to the principles contained within the Data Protection legislation, the data controller should be satisfied that the data is:
  - i) Not currently and, as far as can be reasonably ascertained, not likely to become, part of a 'live' criminal investigation;
  - ii) Not currently and, as far as can be reasonably ascertained, not likely to become, relevant to civil proceedings;
  - iii) Not the subject of a complaint or dispute which has not been actioned;
  - iv) The original data and that the audit trail has been maintained;
  - v) Not removed or copied without proper authority;
  - vi) For individual disclosure only (i.e. to be disclosed to a named subject)



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### 6. Process of Disclosure:

- a) Verify the accuracy of the request;
- b) Replay the data to the requestee only, (or responsible person acting on behalf of the person making the request);
- c) The viewing should take place in a separate room and not in the control or monitoring area. Only data which is specific to the search request should be shown
- d) It must not be possible to identify any other individual from the information being shown, (any such information should be blanked-out, either by means of electronic screening or manual editing on the monitor screen<sup>[1]</sup>).
- e) If a copy of the material is requested and there is no on-site means of editing out other personal data, then the material should be sent to an editing house for processing prior to being sent to the requestee.

#### Note

- (1) The scheme owner is likely to breach Data Protection legislation if a person making a subject access request is able to identify any other individual from the information being disclosed. However a television image is two dimensional and the majority of CCTV schemes do not have immediate access to the necessary technology to blank out or remove 'other data'. It is recommended that the advice of the Data Protection Registrar's office is sought in respect of any method which it is proposed should be adopted.

### 7. Media disclosure

- a) In the event of a request from the media for access to recorded material, the procedures outlined under 'secondary request to view data' should be followed. If material is to be released the following procedures should be adopted:
  - i) The release of the material must be accompanied by a signed release document that clearly states what the data will be used for and sets out the limits on its use.



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



- ii) The release form should state that the receiver must process the data in a manner prescribed by the data controller, e.g. specify identities/data that must not be revealed
- iii) It may also require that proof of editing must be passed back to the data controller, either for approval or final consent, prior to its intended use by the media (protecting the position of the data controller who would be responsible for any infringement of Data Protection legislation and the System's Code of Practice);
- iv) The release form should be considered a contract and signed by both parties<sup>(1)</sup>.

### Notes

- (1) In the well publicised case of R v Brentwood Borough Council, ex parte Geoffrey Dennis Peck, (QBD November 1997), the judge concluded that by releasing the video footage, the Council had not acted unlawfully. A verbal assurance that the broadcasters would mask the identity of the individual had been obtained. Despite further attempts by the Council to ensure the identity would not be revealed, the television company did in fact broadcast footage during which the identity of Peck was not concealed. The judge concluded that tighter guidelines should be considered to avoid accidental broadcast in the future.

## 8. Principles

In adopting this national standard for the release of data to third parties, it is intended, as far as reasonably practicable, to safeguard the individual's rights to privacy and to give effect to the following principles:

- a) Recorded material should be processed lawfully and fairly and used only for the purposes defined in the Code of Practice for the CCTV scheme;
- b) Access to recorded material should only take place in accordance with this Standard and the Code of Practice;
- c) The release or disclosure of data for commercial or entertainment purposes should be specifically prohibited.



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Restricted Access Notice Warning

**Appendix B**

# **WARNING**

## **RESTRICTED**

## **ACCESS AREA**

**Everyone, regardless of status, entering this area is required to complete an entry in the Visitors book.**

**Visitors are advised to note the following confidentiality clause and entry is conditional on acceptance of that clause:**

### **Confidentiality Clause:**

**'In being permitted entry to this area you acknowledge that the precise location of the CCTV monitoring room is, and should remain, confidential. You agree not to divulge any information obtained, overheard or overseen during your visit. An entry accompanied by your signature in the Visitors book is your acceptance of these terms'.**



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**Appendix C**

**Declaration of Confidentiality**

**The Woking Town Centre & Car Parks CCTV System**

I, (.....) am retained by (.....) to perform the duty of CCTV Operator / Manager (or other authorised role as appropriate). I have received a copy of the Code of Practice in respect of the operation and management of that CCTV System.

**I hereby declare that:**

I am fully conversant with the content of that Code of Practice and understand that all duties which I undertake in connection with the (.....) must not contravene any part of the current Code of Practice, or any future amendments of which I am made aware. If now, or in the future, I am or become unclear of any aspect of the operation of the System or the content of The Code of Practice, I undertake to seek clarification of any such uncertainties.

I understand that it is a condition of my employment that I do not disclose or divulge to any individual, firm, company, authority, agency or other organisation, any information which I may have acquired in the course of, or for the purposes of, my position in connection with the CCTV System, verbally, in writing or by any other media, now or in the future, (including such time as I may no longer be retained in connection with the CCTV System).

In appending my signature to this declaration, I agree to abide by the Code of Practice at all times. I also understand and agree to maintain confidentiality in respect of all information gained during the course of my duties, whether received verbally, in writing or any other media format - now or in the future.

**Signed:** ..... **Print Name:** .....

**Witness:** ..... **Position:** .....

**Dated the** ..... **day of** .....



## Appendix D

# Regulation of Investigatory Powers Act 2000 (RIPA) Guiding Principles

## Introduction

The Regulation of Investigatory Powers Act 2000 (hereafter referred to as 'the Act') came into force on 2nd October 2000. It places a requirement on public authorities listed in Schedule 1; Part 1 of the act to authorise certain types of covert surveillance during planned investigations. The guidance contained in this Code of Practice serves to explain and highlight the legislation to be considered. A more detailed section will be included in the Model Procedural Manual to assist users in the application of the requirements

## Background

General observation forms part of the duties of many law enforcement officers and other public bodies. Police Officers will be on patrol at football grounds and other venues monitoring the crowd to maintain public safety and prevent disorder. Officers may also target a crime "hot spot" in order to identify and arrest offenders committing crime at that location. Trading standards or HM Customs & Excise Officers might covertly observe and then visit a shop as part of their enforcement function to verify the supply or level of supply of goods or services that may be liable to a restriction or tax. Such observation may involve the use of equipment to merely reinforce normal sensory perception, such as binoculars, or the use of cameras, where this does not involve **systematic surveillance of an individual**.

It forms a part of the everyday functions of law enforcement or other public bodies. This low-level activity will not usually be regulated under the provisions of the 2000 Act. Neither do the provisions of the Act cover the normal, everyday use of **overt** CCTV surveillance systems. Members of the public are aware that such systems are in use, for their own protection, and to prevent crime. *However*, it had not been envisaged how much the Act would impact on specific, targeted use of public/private CCTV systems by 'relevant Public Authorities' covered in Schedule 1: Part1 of the Act, when used during their planned investigations.

The consequences of not obtaining an authorisation under this Part may be, where there is an interference by a public authority with Article 8 rights (invasion of privacy), and there is no other source of authority, that the action is unlawful by virtue of



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section 6 of the Human Rights Act 1998 (Right to fair trial) and the evidence obtained could be excluded in court under Section 78 Police & Criminal Evidence Act 1978. The Act is divided into five parts. Part II is the relevant part of the act for CCTV. It creates a system of authorisations for various types of covert surveillance. The types of activity covered are "intrusive surveillance" and "directed surveillance". "Covert surveillance" defined Observations that are carried out by, or with, the use of a surveillance device. Surveillance will be covert where it is carried out in a manner calculated to ensure that the person or persons subject to the surveillance are **unaware that it is, or may be**, taking place.

### Part II - Surveillance types

We should clearly differentiate in this guidance between "Intrusive" surveillance which will be a great rarity for CCTV operations and "Directed" surveillance which will be the more likely.

#### "Intrusive" surveillance

This is a highly invasive type of covert surveillance, the like of which CCTV equipment and their images alone would not be able to engage in except on the most rare occasion. The act says: "Intrusive surveillance" is defined as *covert surveillance carried out in relation to anything taking place on residential premises or in any private vehicle. This kind of surveillance may take place by means either of a person or device located **inside residential premises or a private vehicle** of the person who is subject to the surveillance, or by means of a device placed outside which **consistently provides a product of equivalent quality and detail as a product which would be obtained from a device located inside.***

Therefore it is **not intrusive** *unless* the camera capabilities are such that it consistently provides information of the same quality and detail as might be expected to be obtained from a device actually present on the premises or in the vehicle. Our CCTV cameras are deemed incapable of providing this level of detail so as to be considered "intrusive" for the purposes of the act. Current interpretations re sustained gathering of images of persons in a car in a car park dealing in drugs; being able to see clearly inside the car, would not be considered "intrusive" under the act. In particular, the following extract from Section 4 of this code prevents us from carrying out intrusion of premises with cameras. This section puts us in a strong position to resist the use of public cameras in this way by investigators. *Cameras will not be used to look into private residential property. Where the equipment permits it 'Privacy zones' will be programmed into the system as required in order to ensure that the interior of any private residential property within range of*



# WOKING BOROUGH COUNCIL

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*the system is not surveyed by the cameras. If such 'zones' cannot be programmed the operators will be specifically trained in privacy issues.*

### “Directed” surveillance

This level of covert surveillance is likely to be engaged more by public/private CCTV users when they are requested by “authorised bodies” (see later) to operate their cameras in a specific way; for a planned purpose or operation; where ‘private information’ is to be gained.

The act says:

"Directed surveillance" is defined in *subsection (2)* as **covert surveillance** that is undertaken in relation to **a specific investigation or a specific operation** which is likely to result in the obtaining of **private information** about a person (whether or not one specifically identified for the purposes of the investigation or operation); and otherwise than by way of an immediate response to events or circumstances the nature of which is such that it would not be reasonably practicable for an authorisation under this Part to be sought for the carrying out of the surveillance. - **(planned)**,

In this section "private information", in relation to a person, includes any information relating to his private life or family life. If a CCTV user is carrying out normal everyday observations by operating a particular camera to gain the best information; albeit it may not be the most obvious camera to use, or the nearest to the incident being observed, that use will not be deemed to be “covert” under the terms of the act; it is using modern technology to the advantage of the operator. It will only be where CCTV cameras are to be used in a planned, targeted way to gain private information that the requirements of authorised directed surveillance need to be met.

If users are requested to operate their cameras as part of a planned operation where the subject is unaware that targeted surveillance is, or may be, taking place; "private information" is to be gained and it involves systematic surveillance of an individual/s (whether or not the target of the operation) then a RIPA “directed surveillance” authority must be obtained.

### Authorisations

Intrusive surveillance can only be “authorised” by chief officers within UK police forces and H.M. Customs & Excise and is therefore irrelevant for any other authority or agency. It is an area of RIPA that CCTV users can largely disregard.



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



Those who can authorise covert surveillance for public authorities listed in Sch. 1/Part1, in respect to Directed surveillance are detailed in Article 2 / Part I - Statutory Instrument 2417/2000: The Regulation of Investigatory Powers (Prescription of Offices, Ranks and Positions) Order 2000. E.g.:  
*A Local Authority* (within the meaning of section 1 of the Local Government Act 1999).

The prescribed office as a minimum level of authority is: Assistant Chief Officer; Officer responsible for the management of an investigation. *Police Forces* - A police force maintained under section 2 of the Police Act 1996 (police forces in England and Wales). The prescribed level is a Superintendent; for urgent cases an Inspector.

The impact for staff in Police control rooms and CCTV monitoring centres, is that there might be cause to monitor for some time, a person or premises using the cameras. In most cases, this will be an immediate response to events or circumstances. In this case, it would not require authorisation unless it were to continue for some time. The RIPA draft Code of Practice suggests some hours rather than minutes.

In cases where a pre-planned incident or operation wishes to make use of public/private CCTV for such monitoring, an authority will almost certainly be required from the appropriate person with the authorised agency. The 'authority' must indicate the reasons and should fall within one of the following categories:-

*An authorisation is necessary on grounds falling within this subsection if it is necessary-*

- (a) in the interests of national security;*
- (b) for the purpose of preventing or detecting crime or of preventing disorder;*
- (c) in the interests of the economic well-being of the United Kingdom;*
- (d) in the interests of public safety;*
- (e) for the purpose of protecting public health;*
- (f) for the purpose of assessing or collecting any tax, duty, levy or other imposition, contribution or charge payable to a government department;*
- (g) for any purpose (not falling within paragraphs (a) to (f)) which is specified for the purposes of this subsection by an order made by the Secretary of State.*



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



Every RIPA authority must be thought through and the thought process clearly demonstrated and recorded on the application. Necessity and Proportionality must be fully considered; asking the questions: “is it the only way?”, “what else have I considered?”. It should not be a repeat of principles – in order to prevent & detect crime or in the interests of public safety etc.

Whenever an authority is issued it must be regularly reviewed as the investigation progresses and it must be cancelled properly upon conclusion. The completion of these stages will be looked at during any inspection process. In cases where there is doubt as to whether an authorisation is required or not, it may be prudent to obtain the necessary authority verbally and then later in writing using the forms. Forms should be available at each CCTV monitoring centre and are to be included in the procedural manual and available from the CCTV User Group Website Policing examples:

### **Insp. Authorisation- urgent request (up to 72hrs)**

An example of a request requiring an urgent Inspectors authority might be where a car is found in a car park late at night and known to belong to drug dealers. The officers might task CCTV to watch the vehicle over a period of *time (no longer response to immediate events)* and note who goes to and from the vehicle - *sustained surveillance of individual/s gaining private information*.

### **Supt Authorisation – non-urgent request**

Where crime squad officers are acting on intelligence linked to a long term, planned operation and they wish to have a shop premises monitored from the outside over a period of days, which is suspected of dealing in stolen goods.

### **No authorisation required**

Where officers are on patrol and come across a local drug dealer sitting in the town centre/street. It would not be effective for them to remain in a shop doorway and wish to have the cameras monitor them instead, so as not to divulge the observation taking place. *Response to immediate events*.

For access to all relevant information on this Act , including the Schedules and Statutory Instruments referred to in this guidance please visit:  
[www.homeoffice.gov.uk/ripa/ripact.htm](http://www.homeoffice.gov.uk/ripa/ripact.htm)



## Appendix E

### **SUBJECT ACCESS REQUEST FORM**

DATA PROTECTION ACT, 1998

### **How to Apply for Access to Information held on the CCTV System.**

These notes explain how you find out what information, if any is held about you on the CCTV system.

#### **Your Rights**

Subject to certain exemptions, you have a right to be told whether any personal data is held about you. You also have a right to a copy of that information in a permanent form except where such a copy is not possible or would involve disproportionate effort, or if you agree otherwise.

Woking Borough Council and Surrey Police will only give that information if they are satisfied as to your identity. If release of the information will disclose information relating to another individual(s), who can be identified from that information, the council and police are not obliged to comply with an access request unless: -

- Ø The other individual has consented to the disclosure of the information, or
- Ø It is reasonable in all the circumstances to comply with the request without the consent of the other individual(s).

#### **The Council's and Surrey Police's Rights**

Woking Council and Surrey Police may deny access to information where the Act allows.

The main exemptions in relation to information held on the CCTV system are where the information may be held for: -

- Ø The Prevention and Detection of Crime.
- Ø The Apprehension and Prosecution of Offenders.



# WOKING BOROUGH COUNCIL

In partnership with Surrey Police



## Fee

A fee of £10 is payable for each access request, which must be in pounds sterling. Cheques, Postal Orders etc. and should be made payable to:-

**Surrey Police**  
**NW Surrey Division**  
**Woking Police Station**  
**Station Approach**  
**Woking, Surrey Tel: 08451 252222**

## The Application Form

### Section 1:

Asks you to give information about yourself that will help to confirm your identity. We have a duty to ensure that information we hold is secure and we must be satisfied that you are who you say you are.

### Section 2:

Asks you to provide Two Proofs of ID and the documents considered suitable.

### Section 3:

Asks you if you wish to have a permanent copy of the information, or receive acknowledgement of that fact.

### Section 4:

Asks you to help us to find the information you are requesting.

### Section 5:

You must sign the Declaration. When you have completed and checked The Application Form, take it or send it together with the required TWO identification documents and fee to:

**Surrey Police**  
**NW Surrey Division**  
**Woking Police Station**  
**Woking, Surrey Tel: 08451 252222**



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



### Section 1 About Yourself

The information requested below is to help the Council and Surrey Police to (a) satisfy itself as to your identity and (b) find any data held about you.

### Request Form

<b>Your Title</b> (Mr, Miss, Ms, Mrs)		
<b>Other Title</b> (Dr, Rev etc.)		
<b>Surname / Family Name</b>		
<b>First Names</b>		
<b>Maiden Name / Former Name</b>		
<b>Sex</b>		
<b>Height</b>		
<b>Date of Birth</b>		
<b>Place of Birth</b>	<b>Town</b>	
	<b>County</b>	

<b>Your Current Home Address</b>		
<b>Telephone Number</b> <small>(A telephone number will be helpful in case you need to be contacted)</small>	<b>Home</b>	
	<b>Mobile</b>	

If you have lived at the above address for less than 10 years, please give your previous addresses for the period:

<b>Previous address(es)</b>		
<b>Dates of occupancy</b>	<b>From:</b>	<b>To:</b>
<b>Dates of occupancy</b>	<b>From:</b>	<b>To:</b>



# WOKING BOROUGH COUNCIL

## In partnership with Surrey Police



### Section 2 Proof of Identity

To help establish your identity your application must be accompanied by TWO official documents that between them clearly show your name, date of Birth and current address.

For example: -

- A Birth/Adoption certificate
- Driving licence
- Medical card
- Passport
- Or other official document that shows your name and address.

You may provide photocopies of these documents but might be required to produce the original documents at a later stage.

### Section 3 Supply of Information

You have a right, subject to certain exceptions, to receive a copy of the information in a permanent form. Do you wish to?

<b>A</b>	<b>View the information and receive a permanent copy</b>	Please Tick
<b>B</b>	<b>Only view the information</b>	Please Tick

If the information you have requested refers to a specific offence or incident, please complete this section.

Please complete a separate box in respect of different categories / incidents / involvement. Continue on a separate sheet, in the same way, if necessary.

If the information you require relates to a vehicle, property, or other type of information, please complete the relevant section overleaf.

<b>Victim of an offence.</b>	Please Tick
<b>A person accused or convicted of an offence.</b>	Please Tick





**WOKING BOROUGH COUNCIL**  
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**Section 5 Declaration**

The information I have supplied in this application is correct and I am the person to whom it relates.

<b>Signed By:</b>	<b>Date:</b>
-------------------	--------------

***Warning – A person who impersonates or attempts to impersonate another may be guilty of an offence.***

**Before returning this form**

Have you completed ALL sections of this form?

Have you enclosed copies of Two Identification Documents?

Have you signed and dated the form?

Have you enclosed the £10 fee?

**What happens now?**

- § In most cases we will inform you if your request has been granted within 10 working days of the receipt of your subject access request or explain why your request has been denied.
- § If we find the information (data) relevant to your request, we will either supply a written confirmation that your details were captured, or provide this in evidential form, to you or your representative.
- § Woking Council or Surrey Police shall retain the copyright of any data provided. The data shall not be used for Public Entertainment or commercial gain.

**Further Information**

These notes are for guidance only. The law is set out in the Data Protection Act, 1998, obtainable from The Stationary Office. Further information and advice about The Act may be obtained from:-



The Information Commissioner  
 Wycliffe House  
 Water Lane  
 Wilmslow  
 Cheshire  
 SK9 5AF  
 Tel. 01625 545745

Please note that this application for access to information must be made direct to the **CCTV Officer** (address on Page 75) and **NOT** to the Data Protection Commissioner.

## References

## Appendix F

Anonymous Authors (various)	<i>Codes of Practice, Procedural Manuals, Assignment Instructions</i> variously published across the U.K.
Kitchin H (1996).	<i>A Watching Brief, A Code of Practice for CCTV</i> , Local Government Information Unit.
Her Majesty's Stationery Office (1985).	<i>The Police and Criminal Evidence Act, 1984</i> . HMSO.
Her Majesty's Stationery Office (1995).	<i>The Police and Criminal Evidence Act 1984, Codes of Practice, April 1995</i> . HMSO.
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The Stationery Office (1998).	<i>The Data Protection Act, 1998</i> . The Stationery Office
The Stationery Office (1998).	<i>The Human Rights Act, 1998</i> . The Stationery Office