



CCTV STRATEGY 2023-2026

Contents

1.0 Overview	1
2.0 London Borough of Merton – CCTV Policy.....	1
3.0 Objectives of the CCTV Systems	2
3.1 Uses of CCTV in London Borough of Merton	2
3.1.1 System Objectives	2
3.1.2 The Council will not use its Public Space CCTV for:	3
3.1.3 Overt and Covert Cameras.....	3
4.0 Purpose of the Strategy	4
5.0 Governance of the Council’s CCTV Camera systems	4
5.1 Future Permanent Camera locations.....	4
5.2 Rapid deployment cameras	5
6.0 Other CCTV Systems.....	5
7.0 Compliance with this document	5
8.0 Legislation	5
9.0 Transmission Systems	7
9.1 New Technology.....	8
10.0 Investment/Funding.....	8
11.1 Section 106 Town and Country Planning Act 1990.....	9
11.2 Planning Permission and Ducting.....	9
12.0 Management of the CCTV Systems.....	9
12.1 The CCTV Manager.....	10
12.2 CCTV Staff Training.....	10
12.3 Performance Management.....	11
13.0 Maintenance of the CCTV System.....	11
APPENDIX A.....	12
APPENDIX B	14
APPENDIX C.....	16
Appendix D.....	17
CCTV Control room access	17
Visitors	17

1.0 Overview

Closed Circuit Television is one tool, which may be used by Merton Council to prevent, detect and reduce the fear of crime. Currently this strategy is intended purely to reflect the purpose and activities of the Merton Council's Public Space Video Surveillance CCTV service, not other areas where CCTV is utilised by or on behalf of the Council such as Parking, Future Merton and contractors operating on behalf of Environmental Enforcement. The use of CCTV must be assessed, and its implementation considered in conjunction with other preventative methods in accordance with the guiding principles of the use of CCTV within Merton. This CCTV Strategy will apply to fixed and re-deployable camera systems used by Merton Council in Public Space Surveillance (PSS).

2.0 London Borough of Merton – CCTV Policy

The Council uses Closed Circuit Television (CCTV) systems in public spaces, Council offices and departments within and around car parks across the London Borough of Merton area for Public Space Surveillance. These CCTV systems are located across the borough with remote schemes at: -

- Civic Centre
- Pollards Hill
- Morden Park House
- Gifford House
- Youth Offenders Team
- Merton Industrial Estate
- Peel House Car Park
- St. George's Car Park
- Hartfield Road Car Park, Wimbledon
- York Close Car Park

The CCTV service is currently going through an extensive review and upgrade programme reporting to a Project Board. Once established, the intention will be to look to introduce and develop the Steering Group and ensure future oversight of all Council operated or contracted CCTV activities across Merton.

Following the upgrade project, opportunities will be sought to develop this further, and this document updated accordingly. This document alongside the systems' Codes of Practice (CoP) and Operational Procedural Manuals (OPM) are designed to give clear guidelines on the Council's use of CCTV and to protect this Council's CCTV operators from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system. It covers the use of CCTV equipment and the gathering, storage, use and disposal of visual data and applies to all staff employed by London Borough of Merton and those who operate the systems on their behalf. The Council will utilise CCTV for the purposes and objectives set out at paragraph 3.1.1 of this document. It will also apply to those providing a sub-contracted service to the Council where CCTV is used, in whatever form. The Council's responsible representative will

make their sub-contractors aware of this strategy in order that they can comply with its guidance.

3.0 Objectives of the CCTV Systems

It is important that everyone and especially those charged with operating the CCTV systems on behalf of London Borough of Merton understand exactly why each of the systems has been introduced and what the cameras will and will not be used for. This will assist in the planning, design, and implementation of any development. Monitoring and evaluating the scheme will be aided if objectives are clear from the outset. A quantifiable measure should be established prior to the installation of CCTV against which the success of the scheme can be assessed in the future. This will generally be in relation to levels of criminal activity or contravention of Traffic Orders and should consider joint work carried out by internal and external partners. CCTV contributes to delivering a variety of services and link to a range of other strategies.

3.1 Uses of CCTV in London Borough of Merton

Each CCTV system will have its own site or task specific objectives and will only be used for those purposes stated in Section 3.1.1. Additionally, any expansion of the scheme will only be considered if supportive of these purposes.

3.1.1 System Objectives

The LBM CCTV system will be used to: -

- Reduce the fear of crime anti-social behaviour and disorder.
- Prevent, deter and detect crime, criminal damage and public disorder, including vandalism, incidents of public nuisance and anti-social behaviour.
- Identify, apprehend, and prosecute offenders in relation to crime, criminal damage, public order, road traffic accidents involving serious injury and all forms of harassment.
- Provide protection and welfare to members of the public.
- Assist the emergency services in all aspects as appropriate, including major exercises relating to criminal activities and public safety.
- Identify and reduce aggressive begging.
- Provide the Police, the Council, and other organisations as authorised with evidence upon which to take criminal and civil actions in the Courts.
- Assist where appropriate in the general management of the area by identifying issues, such as accumulation of breaches of environmental legislation, litter, damaged or dangerous street signs, etc. and bringing them to the attention of the various service providers and departments.
- Assist with traffic management, accident and congestion reduction.
- Protect areas and premises used by Council staff and the public.
- Reduce violent or aggressive behaviour towards staff.
- Protect Council property and assets.

- Maintain and enhance the commercial viability of the London Borough of Merton areas of the town and encouraging continued investment.
- Assisting in staff disciplinary, grievance, formal complaints and Health and Safety Investigations.
- In appropriate circumstances, assisting the investigation of damage only accidents in Council owned or other privately operated car parks on the payment of an appropriate fee.
- The enforcement of Road Traffic Regulations and Acts.
- Assist third party investigating authorities (outside of the police) in the investigation of road traffic incidents, on payment of an appropriate fee.

3.1.2 The Council will not use its Public Space CCTV for:

- Monitoring the activities of anyone for reasons of age, gender, religion, or race and who have not come to the attention of the operators of the system for one of the above reasons (at paragraph 3.1.1).
- Monitoring anyone lawfully going about their business, unless circumstances are such that give rise to concerns for that person's safety.
- Intrude into the privacy of any individual or company unless in pursuit of one of the above authorised uses.
- Monitoring the activities of their staff unless in pursuit of one of the above authorised uses.
- For purposes of entertainment.

The CCTV systems will not be used for any other purpose than those set out in this document without prior consultation with the Project Board and where appropriate notification to staff and following consultation with the Trade Unions and where appropriate. Any novel or nonstandard use of the CCTV cameras requires the approval of the Project Board and be in line with ICO guidelines. Cameras will not be used to monitor the progress of staff or individuals in the ordinary course of lawful business in the area under surveillance, nor are managers permitted to use the cameras to observe staff working practices or time keeping or to assist them in the day-to-day management of their staff.

Individuals will only be monitored if there is reasonable cause to suspect a criminal offence or serious breach of discipline, potentially amounting to misconduct has been, or may be, about to be committed and this will only be permitted when authorised by the manager tasked with this role and may require the use of a RIPA authorisation.

3.1.3 Overt and Covert Cameras

The CCTV equipment referred to in this Strategy document relates to overt and covert equipment. Overt equipment is clearly visible to all. The London Borough of Merton may on occasions require the use of covert CCTV equipment to enable it to deliver its services. Covert equipment refers to CCTV cameras and recording equipment that is hidden or the term covert refers to a situation where a subject may not be aware they are being recorded/monitored.

4.0 Purpose of the Strategy

The aims of this strategy will be:

- To bring the management and delivery of CCTV in the London Borough of Merton area to a high level of consistency and quality service provision.
- To provide the framework and criteria for the strategic development and on-going management of CCTV schemes that are owned and/or operated by London Borough of Merton.
- To bring a coherent approach to the development of CCTV schemes in line with any Crime, Disorder and Drugs Reduction Strategies.
- To assist with traffic enforcement for the reduction of pollution and congestion.
- To ensure the financial sustainability of schemes.
- To increase the effectiveness of CCTV as a crime and disorder reduction tool in London Borough of Merton by providing the standards for the implementation and management of CCTV.

It does this by:

- Introducing standard policies and procedures that bring the variety of existing schemes in Merton to a comparative level of operation.
- Provides a framework in which all new proposals for CCTV are considered by the Project Board.
- Has a clear direction for the management and development of CCTV so that Partners and stakeholders in existing and potential schemes are able to understand what is expected of a CCTV scheme and are encouraged to participate in its management.

5.0 Governance of the Council's CCTV Camera systems

As an interim measure a Project Board has been established to oversee the upgrade of the Council Public Space surveillance Cameras. Once complete the intention is to establish a CCTV Steering Group (CCTVSG) to oversee the governance of the management and funding of the CCTV systems. The Terms of Reference for this group is shown at Appendix A.

5.1 Future Permanent Camera locations

Any future camera locations should be chosen based on the objectives contained in this document and the attached appendices:

- Does it meet the agreed objectives?
- Does it meet the principles and strategic aims of CCTV/other strategic plans?
- Does it meet agreed criteria?
- How will it be funded and sustained?

Overall, the following approach to future camera locations should be determined as:

- Analysis of strategic gaps in the current town centre systems; 'plugging displacement'.

- Whether an existing camera can be relocated and used elsewhere.
- Coverage of pedestrian links to towns from rail/bus stations and taxi ranks.
- Wider displacement areas – Parks and stand-alone residential or shopping areas.
- Other key activity zones.
- To encourage compliance of Road Traffic Regulations.

See Appendix B regarding the Purchase and Deployment of CCTV Cameras.

5.2 Rapid deployment cameras

Merton CCTV owns a stock of Rapid deployment cameras, which can be used to tackle new hot spots for ASB and fly tipping. The decision were to deploy those cameras is made during monthly tasking meeting.

6.0 Other CCTV Systems

Although there are records and knowledge of the ‘Public Space’ CCTV equipment used and owned by London Borough of Merton, records, settings and benefits relating to ‘stand-alone CCTV systems in other premises such as Council offices, leisure centres, etc. are fragmented and it is not known if they are compliant with legislation. The future intention is there will be a coordinated approach to all Council owned CCTV across the London Borough of Merton area; the levels and uses of such equipment should be established across all departments to ascertain the levels, the state of maintenance, the use and cost to achieve the annual upkeep of the systems.

7.0 Compliance with this document

No Public Space Surveillance, Traffic Management (ANPR) or third party CCTV scheme should be accepted for monitoring from the Council’s CCTV Control Room without first having satisfied the requirements of this strategy. CCTV will be developed in Merton in a considered manner to ensure that all schemes have maximum effectiveness. This strategy will link with several other existing strategies operated by London Borough of Merton including:

- Merton Community Safety Strategy
- Anti-Social Behaviour Strategy
- RIPA Protocol
- Data Protection Policy

8.0 Legislation

In addition to Council policies, procedures, guidelines and Codes of Practice, Operational Procedural Manuals, CCTV and its operation are subject to legislation under: -

- General Data Protection Regulation 2018– ensuring that all personal data is protected and private.
- A Data Protection Code of Practice for Surveillance cameras and Personal Information.
- The Human Rights Act 1998– Article 8 gives individuals the right to privacy and Article 5 gives the right to Liberty and Security
- The Regulation of Investigatory Powers Act 2000 – applying to directed surveillance from our overt CCTV systems.
- The Freedom of Information Act – all recorded information and information relating to individuals are subject to the provisions of the Data Protection Act.
- The Private Security Industry Act 2001– where required by the Act, operators of CCTV will be licensed under the Act.
- Section 17 of the Crime and Disorder Act 1998, which requires the key partners to the strategy to integrate crime reduction within their mainstream activities
- The Protection of Freedoms act 2012 which sets out the criteria where PSS cameras justify a 'Pressing Need'
- Surveillance Camera Code of Practice

It is important that the operation of all Council run CCTV systems comply with these Acts, policies, procedures, guidelines, and Codes of Practice. This is to ensure that Council staff running the CCTV systems, the public and the Council itself are protected from abuse of the CCTV systems. Signage will be used to inform the public of the use and operation of CCTV in the area; guidelines in the way the signs will be designed and installed are shown at Appendix C.

8.1 Operational Requirements

Operational Requirements are used to assess the necessity of CCTV cameras and systems and to ensure full consideration has been made of all implications relating to their installation. An Operational Requirement is “A statement of needs based on a thorough and systematic assessment of the problems to be solved and the hoped for solutions.”

- Is there a problem?
- What is the problem?
- Will CCTV help solve the problem?
- What other solutions have been considered?
- Can we afford what we want?
- Is what we do compatible with existing infrastructure and technology?

The period of retention of data/images, the frame rate suitable to achieve minimum evidential quality and the compression method are shown at Appendix D.

8.2 Privacy Impact Assessments

Where the Council is considering the introduction of new or additional cameras to the existing systems, in addition to carrying out an Operational Requirements Assessment, deliberation must also be made to conducting a Privacy Impact Assessment (PIA). A PIA is a separate process from compliance checking or data protection audit processes, (an audit is undertaken on systems that have already been implemented). A PIA is a valuable measure that will either confirm that privacy undertakings and/or privacy law are being complied with or will highlight problems that need to be addressed. The London Borough of Merton handles personal data using the CCTV and Traffic Enforcement systems and needs to monitor its on-going operations, whether recording images of employees or the general public. Experience shows that once an organisation's reputation is damaged and trust is lost it is then very hard to regain.

A privacy impact assessment should look at the pressing need that the surveillance system is intended to address and whether its proposed use has a lawful basis and is justified, necessary and proportionate. Where the system is already in use, the same issues should be considered, or considerations should be made as to whether a less privacy intrusive method could be used to address the pressing need.

8.3 Accountability/Consultation

In the development or review of any surveillance camera system, proportionate consultation, and engagement with the public and partners (including the police) will be an important part of assessing whether there is a legitimate aim and a pressing need, and whether the system itself is a proportionate response. Primarily, consultation will aim to inform stakeholders of the proposal for a CCTV scheme, to fully explain the objectives and to gather any feedback from interested parties. Residents whose properties are situated adjacent to a proposal may want to request the use of privacy zones to obscure CCTV Operators from viewing areas on that particular camera.

9.0 Transmission Systems

Fibre optic transmission will always be the most reliable and secure method of transmitting CCTV data/ images, but it is usually the most expensive transmission solution. However, to reduce costs through payments to third parties, the Council has secured funding from the Greater London Authority (GLA) and invested in its own dark fibre network which will support the upgrade to digital CCTV cameras. Other alternative transmission includes wireless, which generally requires Line of Sight (LOS) and high buildings with appropriate permissions on which to install wireless equipment. This is less resilient and can be susceptible to interference.

The Council will always consider transmission options that provide it with a resilient yet cost effective solution; this may be with service providers who can offer deals and incentives, including the provision of cameras as part of a package of measures that the Council should consider.

9.1 New Technology

Technology continues to evolve and may improve the CCTV service and reduce the revenue costs if these new technologies are embraced where appropriate. When designing new or replacement CCTV systems, the Council and its advisors will ensure equal importance is placed on 'future-proofing' these existing CCTV systems so that old equipment does not become an expensive burden with implications of maintenance. To this end, High Definition (HD) digital cameras are being introduced, this will ensure greater quality and detail is obtained and the system interrogated 'after the event' with no detriment to the evidence.

10.0 Investment/Funding

The Council has secured external funding to both support the introduction of dark fibre and provided capital funding to upgrade the existing public space cameras to digital. The CCTV operational costs will be funded from the Merton Council's budget and third party contributions and will cover annual revenue expenditure. The Council will seek third party capital funding for new installations wherever possible as well as contributions for on-going revenue where pro-active monitoring by the Council is required or where on-going transmission costs are incurred and paid by the Council. Capital expenditure on new or enhanced CCTV systems owned by the Council will only be approved by the CCTVSG once on-going annual revenue expenditure has been established and a source to fund this has been identified. Such decisions will be documented and circulated.

Where monitoring of other third-party services is provided by the CCTV control room, suitable Service Level Agreements and if necessary, Memorandums of Understanding will be adopted and contracts signed to cover the CCTV operator/control room costs and allow for some profit, for the provision of this service.

11.0 Planning Issues

There are some strategic decisions and priorities that can be implemented as a matter of policy, to ensure that CCTV requirements are not overlooked in any planning application process. This will form part of the work of the once established Steering Group. A combined holistic approach to both transport and the road infrastructure should be taken jointly with those charged with the improvement and development of the borough and those with the community safety responsibility. This will enable all relevant departments to consider the implications of the impact of traffic management, anti-social behaviour or other crime in order that this can be measured, and appropriate methods weighted and costed for prior to planning permissions being granted. This might include the provision of CCTV cameras or just the ducting infrastructure to be installed during the construction phase of works but which will enable cameras to be added later if necessary. Costs for the maintenance and on-going, pro-active monitoring also need to be considered. In the same way that Planning Permissions could be more widely used by other Council departments to

initiate works during the same phase of building works, those responsible for highways works within the Council may carry out works in isolation to other Council departments when road, footpath or other street works take place. If these were notified to other departments and in particular the Safer Merton, it could be possible to ensure dual works take place and all implications considered. If communication and notifications are made between the Safer Merton and the Future Merton team about where intended roadworks/development of areas are to take place, the opportunity for joint funding and the installation of ducts or cameras could be considered as a joint, holistic approach.

11.1 Section 106 Town and Country Planning Act 1990

Every opportunity to exercise a levy on a planning application where the effects are likely to impact on community safety should be taken. This should be used to not only generate capital funds but ongoing revenue streams. Such applications and grants also need to be considered by Safer Merton. A process should be developed between the Planning and Safer Merton in order that when relevant planning applications are made, including for the provision of Section 106 monies, consideration to permit this development or not, is not determined in isolation to community safety and those responsible for its delivery. As a consequence, any monies allocated to the Council should enable an element to be ring-fenced for Safer Merton.

11.2 Planning Permission and Ducting

To avoid reliance on third-party providers, Merton Council recognises the benefits and advantages of installing its own duct and fibre optic cabling and this project is currently underway with an expected completion date end of March 2024. Through the Steering Group, the Council will consider a policy of requiring that developers/builders install spare ducting for Council purposes in all their developments as part of the planning consent process. For example, if a new shopping centre or retail park is being built and ducting is being installed, an extra, spare duct should also be installed for 'unknown' Council use. This will then enable future CCTV (or other Council projects) to use that ducting without additional Civils and other associated costs.

12.0 Management of the CCTV Systems

The Council will operate a 24/7 pro-actively monitored CCTV system with suitably qualified staff to oversee and manage the operation. The Council recognises the role of the CCTV manager is critical to deliver a professional, lawful compliant operation of the Council's CCTV service. The day-to-day service delivery responsibility rests with the designated CCTV manager or supervisor and the staff who operates the CCTV equipment and handles the data. The Council's CCTV Manager is responsible for the day-to-day operation of the Public Space Surveillance CCTV system and acts as the central coordinator and point of contact on all issues relating to CCTV within London Borough of Merton. The CCTV Manager will be responsible for ensuring all users are kept up to date on legislation and changes in procedures and will review the Council's

Policy and Codes of Practice, Operational Procedural Manual documents annually and maintain a central database of all documents relating to the Council's CCTV system.

12.1 The CCTV Manager

The CCTV Manager is responsible for:

- The day-to-day operation of the CCTV systems within their charge and the security and accountability of all equipment and media used by their system. This includes any system owned by the Council but which is in the possession of third parties such as those cameras deployed in leisure and civic centres, schools, recycling centre and remote DVR locations, etc.
- Making sure that authorised staff using the CCTV system are properly trained in the use of the equipment and comply with the Code of Practice, Operational Procedural Manual and policies and procedures. They are not to permit any other staff to operate the equipment or view images without authorisation.
- The CCTV Manager will delegate authority to the CCTV supervisor to be the first point of contact for enquiries, complaints and requests for evidence and as the liaison officer for all external and internal contacts.

12.2 CCTV Staff Training

- All Operators, including those who may have access to monitoring facilities at any secondary monitoring site, will be fully trained in the use of each item of equipment as well as the content of the Code of Practice and this Manual.
- Under the provisions of the Private Security Industry Act 2001 it is a criminal offence for staff to be 'contracted' as public space surveillance (CCTV) Operators in England, Wales, and Scotland without an SIA licence. The Security Industry Authority is the organisation responsible for regulating the private security industry. It is an independent body reporting to the Home Secretary under the terms of the Private Security Industry Act 2001.
- A Public Space Surveillance (CCTV) licence is required when activities ('licensable duties') are carried out using CCTV equipment to:
 - Monitor the activities of a member of the public in a public or private place or
 - Identify a particular person(s)
- A Public Space Surveillance (CCTV) licence is only required when services are supplied for the purposes of or in connection with any contract to a consumer. This will include local agreements between the Council for the supply of monitoring services for a CCTV Control Room operated and staffed by a sub-contracted company whether for payment or otherwise Certificated training to a recognised standard by an SIA approved awarding body (E.g. Edexcel; EDI; City and Guilds etc.) must be undertaken to be issued an SIA PSS CCTV Licence to operate
- Any sub-contracted security staff operating in the CCTV Control Room will be in possession of an SIA CCTV Licence in compliance with this legislation as necessary and to meet the recommended standards of the Home Office National CCTV Strategy. Only warranted police officers are exempt under the provisions of the Private Security Industry Act 2001

- All training will include topics on all relevant social and legal issues. Staff will undertake continuation training on a regular basis.
- Others who may be involved in the use of information gathered by virtue of the Merton Council CCTV System (e.g. investigators, managers, etc.) should be properly educated in respect of the Code of Practice and the Operational Procedural Manual. They should be made aware of the capabilities and limitations of the system and their responsibilities regarding the handling of recorded material.
- Pertinent legislation will be included in any training given to staff.

12.3 Performance Management

Due to the large sums of capital and revenue expense involved in the running and operation of the Council's CCTV system, it is essential that 'value for money' can be demonstrated to members and tax payers. Although most benefit of the PSS CCTV comes from anecdotal testimony, it is crucial that a factual based information system is created to measure monthly and subsequently yearly, quantifiable benefit of the successes and uses of the system.

The following information will be captured and presented by the CCTV Manager annually to the Merton Community Safety Partnership

- The number of viewings that Police officers request and view.
- The number of Evidence packages created for Police to help solve cases.
- The number of arrests on incidents captured by CCTV
- The number of incidents caught on CCTV

Whether incidents are Proactive (i.e. seen by Operators) or Reactive (ie reported by police radio or other) this also includes other 3rd parties solicitors, insurance requests.

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13.0 Maintenance of the CCTV System

A suitable service provider under contract will maintain the various CCTV systems owned by Merton Council. Such contracts will normally be tendered for a period of three years with an option to extend up to a maximum of five years in 12-month intervals.

When tendering for this maintenance service provision, the Council will explore options to include an all-inclusive contract of labour, which includes parts but will be minded ensuring it receives value for money and will not disregard the option to have a labour only contract and parts charged additionally.

APPENDIX A

CCTV Steering Group

The purpose of the CCTVSG is to provide a forum for relevant responsible officers to discuss the implementation of CCTV policy and provisionally agree financial and developmental issues in relation to the development of CCTV in the borough. The agreement and adoption of a CCTV Strategy for LBM will engage stakeholders in a cohesive manner, providing all parties who make use of the system to accept the role and authority of the designated, responsible manager. A LBM CCTV Strategy Group will be a suitable focus consortium to coordinate work and drive up the efficiency and effectiveness of the CCTV service.

Membership of the Steering Group to include:

- E&R Assistant Director (chair)
- CCTV Manager
- Street Scene & Waste
- Highways/Future Merton
- Parking Services
- Green Spaces
- Metropolitan Police Service
- Relevant key stake holders (e.g. RSL's)
- Capital Programme manager
- Facilities Manager
- IT Service Manager
- Planning
- Head of Safer Merton
- Crime & Design Manager/CTSA (police)
- Head of Policy, Strategy and Partnerships
- Commissioning Manager (as required)
- CCTV Consultant (as required)

Purpose

- The Steering Group will bring together stakeholders from across the borough to have an input into the operation of CCTV, including:
- Assessing, modifying, and then adopting the documented CCTV Strategy for the LBM
- Identifying and agreeing a strategic direction for CCTV in conjunction with the agreed CCTV Strategy.
- Providing a forum for the provision, use and operation of CCTV;
- Acting as a corporate contact point for development of partnership working with other organisations and stakeholders, e.g. the police, local business users of CCTV, other neighbouring Councils;
- Will be the lead for receiving proposals/requests for the provision of CCTV Camera scheme/s, or significant changes to delivery of the service and the only

group to sanction additional CCTV cameras for whatever department for the LBM;

- To agree, develop and maintain the criteria/procedures for the provision of new/ revised CCTV camera scheme/s;
- Coordinating and agreeing to publicise positive aspects and good works carried out by the CCTV system/operators;
- Agree levels of investment, both capital and revenue for the CCTV system;
- Decide on any disinvestment of the system (e.g. decommissioning cameras);
- To ensure oversight and legal compliance with all aspects relating to the CCTV system, (Senior Responsible Officer function) including those associated with Traffic Enforcement that could impact on the Council and partner services.

APPENDIX B

Control of the Addition of CCTV Systems

There is a need for more centralised control of CCTV development for Merton Council, based on an agreed policy, strategy and delivery plan. If any 'stand-alone' CCTV systems are installed across the council area, these can attract disproportionate installation and on-going revenue costs. When diverse requests for CCTV cameras are made, the applicant or council officer completes a Criteria Form to focus thinking on the reasons why a camera or a complete CCTV system might be needed and implemented and where it fits into the plan to balance unfocused extraneous demands.

The London Borough of Merton will adopt a 'central assessment system' whereby any/all requests for the installation of CCTV across the council area, are considered by the Corporate CCTV Steering Group and weighted and scored against Cost, Operational Requirements, PIA, Fitness for Purpose, Quantity, Quality and Accountability. This applies to both Public Space, Traffic Enforcement and 'stand-alone' systems in council owned premises. Purchase and Deployment of CCTV Cameras London Borough of Merton is committed to respecting people's rights to privacy and supports the individual's entitlement to go about their lawful business. This is a primary consideration in the operation of any CCTV system, although there will inevitably be some loss of privacy when

CCTV cameras are installed often in response to a crime and disorder incident or series of incidents. Currently the CCTV service have access to over 20 deployable CCTV cameras. On each occasion the deployment of a camera is requested, it is crucial that serious consideration is given to the necessity for cameras in a given location and their impact on the privacy of individuals using the areas where cameras are to be installed. Cameras are not to be installed in such a way that they can look into private space such as houses unless they can be fitted with privacy zones, which block out private areas so that these cannot be viewed or recorded.

Covert cameras are not normally to be deployed into areas used by staff or the public. Cameras should normally be clearly visible and signed. Concealed and unsigned cameras within council property may on rare occasions be deployed in areas of high security where there is no legitimate public access and where staff access is controlled and restricted. Staff who normally work in these areas should where appropriate be informed of the location of these cameras, their purpose and where the monitor is kept.

London Borough of Merton will not use CCTV cameras if there are cheaper, less intrusive, and more effective methods of dealing with the problem. If after looking at all the alternatives, it is decided that CCTV is the only suitable solution a clear operational objective for the system and each camera must be identified and an assessment on the impact on privacy must be carried out. A record of these decisions must be retained for inspection and reviewed every year. A copy of these documents should be sent to the council's CCTV Manager. Authorisation for the purchase and installation of CCTV cameras must be obtained from the council's CCTV Steering Group after production of a business plan/report. How the system will be paid for and its annual revenue costs and how they will be met must also be identified. This applies

to ANY/ALL LBM departments, including those enforcing traffic regulations, who should channel all CCTV request through one authorised manager. Public consultation for new camera systems must also be considered.

The council's CCTV Manager will be available to give advice at each stage of the above process. Once a decision is made to purchase CCTV cameras advice should be sought from the council's Legal Services Team to ensure that the correct procedures are followed. It is a requirement under the Information Commissioners Code of Practice and the National CCTV Strategy that any equipment purchased is fit for purpose and will meet the objectives set down for the scheme. There is also a clear requirement for all CCTV schemes to have an effective maintenance schedule and Code of Practice. Officer's purchasing new CCTV equipment need to ensure these requirements are met. London Borough of Merton does not deploy 'Dummy' cameras as these give a false sense of security. Neither are council officers to purchase cameras that can monitor conversation or be used to talk to individuals as this is seen as an unnecessary invasion of privacy. Once new cameras have been installed, a copy of a map or building plan showing the location of the CCTV cameras should be sent to the council's CCTV Manager for inclusion in the council's central CCTV records.

APPENDIX C

Signage

The London Borough of Merton will have a consistent CCTV signage policy. All areas where CCTV is in use should have clear, consistent signs exhibited to comply with the Data Protection Act; this is to advise people that they are about to enter an area covered by CCTV cameras or to remind them that they are still in an area covered by CCTV. The signs will also act as an additional deterrent. CCTV signs should not be displayed in areas, which do not have CCTV cameras. Where 'Covert' cameras have been authorised for deployment, signage will not normally be erected.

Signs should carry the outline of a CCTV camera. The information on the sign should explain why the CCTV cameras are there, including Traffic Enforcement purposes, who runs them (London Borough of Merton) and a contact number (020 8545 3843). The signs, position and the message need to be big enough to enable people to easily read the information on it (A3 size as a minimum).

Consideration will be given by the CCTVSG to promoting the telephone number contained on the sign to encourage the public to bring to the attention of CCTV operators incidents that are currently occurring that will be quicker for the PSS CCTV system operators to respond than awaiting notification from the police via the normal public/police communication channels.

Appendix D.

CCTV Control room access

For reasons of security and confidentiality, access to the CCTV Control Rooms is restricted to authorised personnel only. Public access to the CCTV Control Rooms and recording facility is prohibited except for lawful, proper and sufficient reasons. Any such visits will be conducted and recorded in accordance with the contractor's operational rules, procedures and guidelines approved by the Council.

The control room has a secure entrance lobby for added privacy and this will always remain secured. Routine access to the control room will be limited through an electronic door entry system to:

- Duty CCTV staff
- Designated officers of the council

Arrangements will apply to visitors and contractors as outlined below.

Visitors

Organised visits for viewing the operation of the system will be arranged from time to time. These visits may be subject to change or termination at short notice to meet operational requirements. Operation of equipment will only be carried out by the duty operator. Visitors may be asked to make their request in writing specifying the reasons for that request.

It is important that operations are managed with minimal disruption. Casual visits will not be permitted. All visitors will sign a log detailing their name, organisation, purpose of visit and their arrival and departure times. This log will be subject to regular audit and assessed to ensure compliance with the code of practice.