



**SURVEILLANCE CAMERA  
COMMISSIONER**

# **A National Surveillance Camera Strategy for England and Wales [DRAFT]**

October 2016



## ABOUT THIS CONSULTATION

- Duration:** From 25/10/2016 to 06/12/2016
- How to respond:** Please send your response by 06/12/2016 via an online survey at:  
<https://www.gov.uk/government/organisations/surveillance-camera-commissioner>
- Additional ways to respond:** Written responses can also be sent to:  
  
Surveillance Camera Commissioner  
1<sup>st</sup> Floor, Peel Building, 2 Marsham Street, London,  
SW1P 4DF  
  
Email: [sccconsults@sccommissioner.gsi.gov.uk](mailto:sccconsults@sccommissioner.gsi.gov.uk)
- Response paper:** A response to this consultation exercise is due to be published by April 2017 at:  
  
<https://www.gov.uk/government/organisations/surveillance-camera-commissioner>

## CONSULTATION PRINCIPLES

The principles that government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<https://www.gov.uk/government/publications/consultation-principles-guidance>

## EXECUTIVE SUMMARY

1. The Government is fully supportive of the use of overt surveillance cameras in a public place whenever that use is: in pursuit of a legitimate aim; necessary to meet a pressing need; proportionate; effective, and; compliant with any relevant legal obligations.
2. The Surveillance Camera Commissioner is appointed by the Home Secretary as set out in the Protection of Freedoms Act 2012 (PoFA). It is Commissioner's role to ensure surveillance camera systems in public places keep people safe and protect and support them. The Commissioner's remit applies to England and Wales, as does the Government's Surveillance Camera Code of Practice (SC Code).
3. The surveillance camera sector includes CCTV, body worn video, automatic number plate recognition and unmanned aerial vehicles. Indicative estimates are available of the number of CCTV cameras yet these only cover part of surveillance camera coverage and capability.
4. Work on a strategy was agreed by the Commissioner's Advisory Council in January 2016. The Advisory Council agreed to support work to draw together a comprehensive national surveillance camera strategy that seeks to develop a holistic approach to raising standards and compliance with legal obligations in line with the 12 guiding principles of the SC Code. Partnership working is at the heart of the strategy.
5. It is an ambitious strategy with long-term objectives and delivery plans which extend beyond 2020. In the first three-year period (2017 – 2020) we will progress in the full knowledge that technological change is moving at an exponential rate, so the world is changing around us. We want to develop a stronger evidence base before 2020 to inform further strategic planning to maintain momentum.
6. The Commissioner's strategic vision is:

*The public are assured that surveillance cameras in public places are there to keep and make them feel safe, and that those cameras are deployed and used responsibly as well as transparently in a manner which is proportionate to their legitimate purpose.*
7. The Commissioner will deliver this strategic vision by:

*Providing direction and leadership in the surveillance camera community, to enable system operators to understand best and good practice, and then demonstrate compliance with the principles of the SC Code and any associated guidance.*
8. Therefore, the strategy links in with other relevant legislation such as the Data Protection Act, Private Security Industry Act and other associated guidance.
9. The strategy will reach out to all system operators. Those who are a relevant authority under a statutory duty to have regard to the SC Code, and those who are free to adopt the SC Code on a voluntary basis.
10. The strategy has been divided into the following work strands each led by sector expert:
  - Standards
  - Horizon Scanning
  - Civil Engagement

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- Police
- Local authorities
- Voluntary adopters
- Critical National Infrastructure
- Installers, designers and manufacturers
- Training
- Regulation

11. Objectives have been developed for each strand with a supporting delivery plan setting out specific actions and outputs which contribute towards achieving the strategic mission. Delivery plans will be published in 2017.

12. The Commissioner owns the strategy and is accountable to Parliament and the public through the submission of an Annual Report which is laid in both Houses.

## INTRODUCTION

1. The Government is fully supportive of the use of overt surveillance cameras in a public place whenever that use is: in pursuit of a legitimate aim; necessary to meet a pressing need; proportionate; effective, and; compliant with any relevant legal obligations.
2. The Surveillance Camera Commissioner is appointed by the Home Secretary as set out in the Protection of Freedoms Act 2012 (PoFA). It is the role of the Surveillance Camera Commissioner to ensure surveillance camera systems<sup>1</sup> in public places keep people safe and protect and support them. The Commissioner's statutory functions are to encourage compliance with the Surveillance Camera Code of Practice<sup>2</sup> (SC Code), review its operation and advise Ministers on any changes to the SC Code and related legislation. The SC Code was issued by the Home Office in 2013 and sets out 12 guiding principles which, if followed, will ensure surveillance cameras are used effectively, efficiently and proportionately. This applies in England and Wales as does this strategy.
3. PoFA sets out that relevant authorities must have regard to the guidance in the SC Code. In general terms relevant authorities are specified as the police, the National Crime Agency and local authorities<sup>3</sup>. The SC Code is clear that any other organisations operating surveillance camera systems in public places are to be encouraged to adopt its guiding principles voluntarily and make a public commitment to doing so.<sup>4</sup>
4. This strategy aims to provide direction and leadership in the surveillance camera community to enable system operators to understand best and good practice and their legal obligations, such as those contained within the Data Protection Act and the Private Security Industry Act, and then to apply that understanding to demonstrate compliance with the principles of the SC Code and any other associated guidance. That legislation applies whether the system operator is a relevant authority under a statutory duty to have regard to the SC Code or is free to adopt the SC Code on a voluntary basis.
5. Work on the strategy was agreed by the Surveillance Camera Commissioner's Advisory Council<sup>5</sup> in January 2016 following the submission of an outline vision paper<sup>6</sup> by the Commissioner. The Advisory Council approved this approach and agreed to support a project to develop a comprehensive national surveillance camera strategy that seeks to deliver a holistic approach to raising and maintaining standards.
6. The Commissioner has been impressed with the support, encouragement and engagement across the range of stakeholders for a national strategy. It is clear there is energy for greater co-ordination to improve compliance and raise standards in the world of surveillance cameras and we have a team of experts leading strands of work and working in partnership with other regulators and stakeholders to drive this work forward. This will provide a blueprint and a delivery plan that will afford significant operational cost benefits, economies of scale, enhanced training opportunities and more focused direction for manufacturers and suppliers. The end result being a more transparent, efficient and effective approach to public space surveillance. The true beneficiary being the public – safe in the knowledge that surveillance cameras are there to keep them safe and protect them.

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<sup>1</sup> Surveillance camera systems are defined in POFA s.29(6). In general terms this means CCTV, IP enabled video surveillance systems, body worn cameras, automatic number plate recognition systems, UAV (drone) mounted surveillance systems, and the associated software which may be applied to analyse the data collected.

<sup>2</sup> <https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>

<sup>3</sup> Section 33 Protection of Freedoms Act 2012

<sup>4</sup> Para 1.17, Surveillance Camera Code of Practice June 2013

<sup>5</sup> <https://www.gov.uk/government/publications/surveillance-camera-advisory-council-terms-of-reference>

<sup>6</sup> <https://www.gov.uk/government/publications/national-surveillance-camera-strategy-outline-document>

## WHY WE NEED A STRATEGY

7. Surveillance camera systems are used in public places by numerous organisations all of whom have an interest in how policy and regulation in this area develops. These include local authorities, the police, other major sectors such as transport providers, health care and education providers, retailers, system installers, manufacturers, Government, regulators, business and members of the public. Surveillance cameras in public places are used for many purposes which aim to keep people safe, including – to investigate and deter crime and anti-social behaviour, protect people and property and to keep traffic moving in our towns and cities. Surveillance cameras are also increasingly being used for access control, management of properties and buildings and may be linked through the internet to other databases and software.
8. In recognition of public concerns over the extent of surveillance camera systems and the potential for unjustified invasion of privacy or other misuse, Parliament approved measures for additional regulation for their use in PoFA. That regulation is through a statutory Code of Practice and the Surveillance Camera Commissioner, who is appointed by the Home Secretary and independent from Government reporting to Parliament on an annual basis. This strategy and its delivery plan will provide a framework that informs that annual report
9. The aim of the SC Code is to promote surveillance by consent. System operators follow the 12 guiding principles in the SC Code to ensure that any surveillance of the public is necessary, proportionate, in pursuit of a legitimate purpose, effective in meeting that stated purpose and transparent.
10. The Government's intention is that regulation in this area is about improving the quality of decision-making over whether surveillance is necessary and how to undertake it effectively without excessive interference with privacy. The SC Code links into the Data Protection Act (and other relevant legislation) – this helps to ensure that data protection obligations are met in full, and promotes greater transparency about the use of surveillance camera systems.
11. Both the Government and the Surveillance Camera Commissioner remain of the view that whilst the number of surveillance cameras in operation may be indicative of the scale of surveillance, those estimates should always be treated with caution when commenting on the necessity of the surveillance undertaken. For example, these estimates take no consideration of the quality of images the cameras capture, how useful those images are or if the cameras are being used for a specified purpose in pursuit of a legitimate aim to meet a pressing need. There is a strong argument that it would be a mistake to develop policy and regulation on the basis that the number of cameras should be increased or reduced when the real consideration should be whether the cameras are necessary.
12. Since the 1990s the use of surveillance cameras expanded significantly and without specific and bespoke legislation. PoFA provided a single legislative framework for the first time. Yet there are still representations to the Commissioner's Standards Group<sup>7</sup> and Advisory Council from manufacturers, installers, consultants and end users calling for clearer guidance as to what standards and practices should be adopted. Currently there are numerous standards, codes of practice and guidance notes – see Annex A. The sheer number can create regulatory confusion in the surveillance camera sector which means rather than meeting a standard or complying with legislative and regulatory requirements they may do nothing. The

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<sup>7</sup> <https://www.gov.uk/government/publications/surveillance-camera-standards-group-terms-of-reference>

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Commissioner's Standards Group have made some progress to simplify the standards framework. This strategy will help provide further clarity and direction.

13. The surveillance camera sector is massive and is an industry that will continue to grow – there was a £2,120m turnover in the UK in 2015 on video and CCTV surveillance<sup>8</sup>. The most recent estimates suggest that there are between 4m – 6m CCTV<sup>9</sup> cameras in the UK. Considering these figures do not include the following types of surveillance camera – automatic number plate recognition, body worn video and unmanned aerial vehicles – that number is likely to be higher than when reported in 2013. These figures are indicative of the scale of surveillance, yet give no real indication whether surveillance is necessary nor of compliance with good practice or legislative requirements.
14. Considering the amount invested in the sector and the many groups involved in keeping the public safe – some already working together, there is a need for an overarching, coherent strategy that underpins the use of surveillance cameras bringing together all relevant groups. Such an approach will provide a better understanding of the links and opportunities for collaboration across organisations, leading to better economies of scale and will ensure funds (often taxpayers' (but not always)) are spent prudently. This economy of scale will not only protect the public purse but ensure systems are fit for purpose as the 'internet of things' develops and procurement is geared up to meet that challenge.
15. The strategy will need to be adjusted to meet the technological developments. The pace at which the developments evolve is at times staggering and can increase the risk of intruding into the privacy of an individual or community. Ensuring that the strategy is flexible and can develop with technology as it advances will help mitigate the effect on individuals and communities so that their privacy is protected.
16. This is not the first attempt at a national strategy for surveillance cameras in England and Wales. The 2007 CCTV Strategy<sup>10</sup> attempted to do this with regard to CCTV. It was an ambitious, systematic and innovative approach but for a number of reasons much of it didn't move from recommendations into delivery. Subsequently to the publication of that strategy, the Government decided to appoint an interim CCTV Regulator<sup>11</sup> and then to further regulate CCTV as part of the Coalition Government agreement<sup>12</sup>. These developments led to implementation of the strategy being shelved and a policy shift towards regulation under PoFA. Development of this strategy needs to acknowledge and build on the ambition of the 2007 CCTV Strategy.

## PROGRESS TO DATE

17. Since the legislation was enacted in 2012 and the SC Code issued by the Home Office in 2013 some significant progress has been made by the Commissioner, his Advisory Council and Standards Group as well as by many others in the industry to raise standards and promote the SC Code:
  - **A self-assessment tool**<sup>13</sup> which is easy to use enabling any organisation using surveillance cameras in public places to identify where they are meeting the 12 guiding principles or where they are falling short. It allows them to develop an action

<sup>8</sup> [http://ec.europa.eu/mwq-internal/de5fs23hu73ds/progress?id=jWb-O0uwDNIMmb\\_JXclPsvrnDFQL7HIKRf\\_fjMqoZ5l,-](http://ec.europa.eu/mwq-internal/de5fs23hu73ds/progress?id=jWb-O0uwDNIMmb_JXclPsvrnDFQL7HIKRf_fjMqoZ5l,-) (Table 6., pg. 117)

<sup>9</sup> <http://www.bsia.co.uk/Portals/4/Publications/195-cctv-stats-preview-copy.pdf>

<sup>10</sup> <http://www.statewatch.org/news/2007/nov/uk-national-cctv-strategy.pdf>

<sup>11</sup> <http://www.publications.parliament.uk/pa/cm200910/cmhansrd/cm091215/wmstext/91215m0004.htm>

<sup>12</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/78977/coalition\\_programme\\_for\\_government.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/78977/coalition_programme_for_government.pdf)

<sup>13</sup> <https://www.gov.uk/government/publications/surveillance-camera-code-of-practice-self-assessment-tool>

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plan to show due regard to the SC Code. As of 30 September 2016, 85% of local authorities have completed the tool.

- **A third party certification scheme**<sup>14</sup> where such organisations can apply to be assessed for compliance with the SC Code by an independent certification body and if successful use the Commissioner’s certification mark for 12 months or five years – an outward sign of inward compliance with the SC Code. As of 30 September 2016 41 organisations are certified against the SC Code.
- **A passport to compliance** – formerly an operational requirement document that puts responsibility for system development in the hands of those that operate them. The passport to compliance will aim to reduce technical jargon to enable procurement experts within organisations to have the ability to properly hold suppliers to account, where non compliance of the SC Code is evident. This is currently being tested.
- **A list of recommended British, European and international standards** published on the Commissioner’s website<sup>15</sup> for CCTV operators, installers, maintainers, manufacturers as well as CCTV monitoring companies.
- **Working with sectors outside the relevant authority definition to promote voluntary adoption** and compliance with the SC Code – for example, Universities, Banking, Transport and Retail.
- Publication of **CCTV advice for members of the public on the ICO website**<sup>16</sup>.
- **Development of ‘surveillance roadmap’**<sup>17</sup> led by the Information Commissioner’s Office setting out the roles and responsibilities of the bodies involved in overseeing surveillance legislation in the UK.
- **Revision of the ICO CCTV Code of Practice (In the picture: A data protection code of practice for surveillance cameras and personal information)**<sup>18</sup>. The code sets out the Information Commissioner’s recommendations on how operators of surveillance camera systems can meet the legal requirements of the Data Protection Act. The updated version contains bespoke advice for operators of automatic number plate recognition, body worn video and unmanned aerial vehicles. It also explains the wider regulatory landscape including the relationship between the remits of the Information Commissioner and the Surveillance Camera Commissioner.
- **A series of best practice case studies** which are available on the Surveillance Camera Commissioner’s website<sup>19</sup>.

## CHALLENGE

18. The public have a right to expect surveillance camera systems as one measure to help keep them safe and secure. Yet this is only possible where systems are fit for purpose, operated effectively, transparently and in compliance with any relevant legal obligations. Local authority CCTV systems can often play a proactive role in identifying where crimes may be taking place and directing a police response. However, local authority funding of CCTV has

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<sup>14</sup> <https://www.gov.uk/government/publications/surveillance-camera-code-of-practice-third-party-certification-scheme>

<sup>15</sup> <https://www.gov.uk/guidance/recommended-standards-for-the-cctv-industry>

<sup>16</sup> <https://ico.org.uk/for-the-public/cctv/>

<sup>17</sup> <https://www.gov.uk/government/publications/surveillance-road-map>

<sup>18</sup> <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

<sup>19</sup> <https://www.gov.uk/government/collections/surveillance-camera-code-of-practice-case-studies>

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been in decline for some time. A recent report by Big Brother Watch<sup>20</sup> has shown a 46.6% decrease on funding spent on the installation, maintaining and monitoring of CCTV by local authorities since 2012 – from around £515m to approximately £277m. This downturn in spend is likely to indicate some councils switching off or reducing their CCTV provision. In 2015/16 alone, towns such as Havant and Newbury have switched off schemes to save money and Westminster Council have also questioned their role in the provision of monitored CCTV. Anecdotal evidence also points towards CCTV Manager roles, that had previously been stand alone, being removed and merged with other management roles thereby arguably diluting the expertise in this area within local authorities.

19. After an incident takes place it is crucial that law enforcement agencies can determine what images exist, locate the owner of the footage, access it and then retrieve and analyse the images – all this must be done within the boundaries of current legislation.
20. At the same time we are seeing a rise in cyber crime and a fall in traditional crime<sup>21</sup> so what role should surveillance cameras have in this changing dynamic, are they effective? Should we rely on privately owned systems or members of the public (many of whom carry mobile devices which can record footage) to record incidents in public places? Furthermore, with a terrorism threat that is currently severe, what role will surveillance cameras play in identifying and countering that threat and what role will local authority systems play?
21. Against this background it appears even more vital that local authorities (and others) can make informed decisions about use of surveillance cameras and explain their use to local communities. The guidance and tools now available via the Surveillance Camera Commissioner enable any organisation to visibly demonstrate it uses surveillance cameras proportionately, efficiently and effectively and complies with the SC Code.
22. We are seeing continual technological advancements that mean how surveillance cameras are used in the present and future is changing significantly – as is the data they capture. For example in 2016 the Metropolitan Police used automatic facial recognition at the Notting Hill Carnival using a database of individuals who were forbidden from attending the Carnival, as well as individuals wanted by police who it was believed may attend the Carnival to commit offences<sup>22</sup>. Technology companies are fast improving automatic facial recognition software and other analytical capabilities such as sensors that can detect explosives. We are on the advent of superfast WiFi and 5G connectivity. Digital data from a wider range of sources can be analysed and compared alongside surveillance camera images and information. Smart cities<sup>23</sup> and the internet of things<sup>24</sup> are no longer science fiction but becoming a reality.
23. Whilst these technical advances present us with many exciting opportunities we must be mindful of how they will impact individuals' right to privacy. Equally, technology is being developed that means the data captured can be anonymised in such a way that it further protects an individual's privacy – software that turns people into avatars on monitors so all that is viewed on the screen is a computer generated image rather than images of people.
24. The available evidence does indicate that the public remains supportive of the use of surveillance cameras. Research in 2014<sup>25</sup> showed 86% of people support the use of CCTV in public places. Although as the way devices are used changes such as increased use of

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<sup>20</sup> <https://www.bigbrotherwatch.org.uk/wp-content/uploads/2016/02/Are-They-Still-Watching.pdf>

<sup>21</sup> <http://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmar2016>

<sup>22</sup> <http://news.met.police.uk/news/notting-hill-carnival-2016-181523>

<sup>23</sup> Cities where digital technology and infrastructure is embedded throughout to more effectively engage with its citizens

<sup>24</sup> Network connectivity and computing extends to numerous devices such as sensors, cameras and so on (not necessarily computers) are connected to the internet, allowing these devices to generate, exchange and consume data with minimal human intervention.

<sup>25</sup> [http://www.synecticsuk.com/images/pdfs/press/CI55\\_Synectics%20survey\\_spring2014.pdf](http://www.synecticsuk.com/images/pdfs/press/CI55_Synectics%20survey_spring2014.pdf)

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automatic facial recognition and body worn video they may become more intrusive and will this support remain the same? Transparency and therefore understanding will become more of a priority as technological advances challenge our views on citizens' right to privacy.

25. Government stated that implementation of regulation under PoFA was to be incremental<sup>26</sup>. Now there is a box of tools to support compliance with the SC Code, the ambition must be to encourage and enable ever greater compliance amongst relevant authorities (and others). This is evidenced through a passport to compliance – previously known as an operational requirement – and certification against it. This links into the dissemination and raising of standards of practice and legal compliance to other legislation such as the Data Protection Act and Private Security Industry Act which is central to this strategy.
26. The SC Code was created to bring coherence in what was already a complicated picture of legislation and regulation. This has undoubtedly helped but there still remain numerous codes of practice in circulation, an abundance of guidance and lots of organisations involved. There remains scope for regulatory confusion, which cannot be good for the system operator or for the public.
27. This strategy attempts to draw these many players together so that the expertise, energy and resources can be directed to greatest effect. It will do this by bringing together a group of experts and establishing a set of delivery plans (for 2017 – 2020) linked to each area of expertise. It will look at links across these areas in an attempt to help them work together in one coherent strategy. If this is achieved it will mean surveillance cameras are used to keep the public safe where they are necessary, proportionate, effective and transparent.
28. The evidence base for the effectiveness of surveillance cameras, the outcomes they can deliver and the costs and benefits need further development. We must stimulate data gathering (performance indicators, feedback from the Criminal Justice System on prosecutions involving surveillance cameras and so on) and research to provide a richer picture so system operators can make informed decisions and the public who are under surveillance can engage in meaningful discussion about the pros and cons. PoFA empowers the public to challenge surveillance camera operators. We must ensure this can be done in an informed manner which can address some of the myths which continue to appear in the media – this will be achieved if we have a sound evidence base to challenge these perceptions. This evidence will be crucial to making any case for the future shape of regulation.

## VISION

29. The strategy is ambitious with long term objectives and delivery plans which extend beyond 2020. In the first three year period (2017 – 2020) we will progress in the full knowledge that technological change is moving at an exponential rate so the world is changing around us. As set out at earlier an ambition is to develop a stronger evidence base before 2020 to inform further strategic planning to maintain momentum.
30. The Commissioner's strategic vision is:

*The public are assured that surveillance cameras in public places are there to keep and make them feel safe, and that those cameras are deployed and used responsibly as well as transparently in a manner which is proportionate to their legitimate purpose.*

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<sup>26</sup> <https://www.gov.uk/government/publications/circular-0112013>

## MISSION

31. The Surveillance Camera Commissioner will deliver this strategic vision by:

*Providing direction and leadership in the surveillance camera community, to enable system operators to understand best and good practice, and then demonstrate compliance with the principles of the SC Code and any associated guidance.*

## SCOPE

32. The strategy aims to reach any organisation or individual operating surveillance camera systems overtly in public places. That said, it will be necessary to prioritise available resources where the greatest benefits are anticipated over the three year period. Given the relatively small proportion of public space surveillance undertaken by relevant authorities, the strategy will include activity directed towards encouraging the wider awareness and adoption of the SC Code on a voluntary basis. The strategy will, however, focus on the use of surveillance cameras in public places by organisations rather than by domestic householders or members of the public. The delivery plans in each strand will set out how this will be achieved. When considering the industry as an enabler of compliance, the strategy will prioritise larger designers and installers as they are more likely to be installing or maintaining large scale surveillance systems in public places. With that in mind it will be necessary to prioritise available resources where the greatest benefits are anticipated over the three year period and work with other parts of the sector after that.

33. Public place has the meaning given by Section 16(b) of the Public Order Act 1986<sup>27</sup> and is taken to include any highway and any place to which at the material time the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. In reality, there will be surveillance camera systems which cover both public and non-public places; for example, the shop floor and storerooms of retail premises. In practice, unless the organisation which undertakes surveillance installs two separate systems, then consideration of compliance within the public place will also lead to consideration of compliance in the non-public areas. This may technically go beyond the intention of PoFA, yet it would appear to bring additional benefits to the system operator.

34. Surveillance camera systems are defined by Section 29(6) of PoFA.<sup>28</sup>

## OBJECTIVES

35. In consultation through their networks the strategy group has identified high level objectives. To support achieving the vision and mission each objective has an expert leading on shaping work to create leverage for the Commissioner. There are 10 strand leads. There is an eleventh (longer term objective in terms of the implementation plan which is dependent on scoping content and agreeing ownership and resourcing and online information hub – at present there is no strand lead. The objectives are:

1. A clear road map is available to enable certification against a range of recognisable **standards** for the whole spectrum of the industry (manufacturers, installers,

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<sup>27</sup> <http://www.legislation.gov.uk/ukpga/1986/64/enacted>

<sup>28</sup> (a) closed circuit television (CCTV) or automatic number plate recognition (ANPR) systems; (b) any other systems for recording or viewing visual images for surveillance purposes; (c) any systems for storing, receiving, transmitting, processing or checking the images or information obtained by (a) or (b); (d) any other systems associated with, or otherwise connected with (a), (b) or (c) It Excludes any camera system with relevant type approval of a prescribed device under Section 20 of the Road Traffic Offenders Act 1988 used exclusively for enforcement purposes, which captures and retains an image only when the relevant offence is detected and with no capability to be used for any surveillance purpose. For example, for the enforcement of speeding offences.

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designers, end users/system operators) in delivering surveillance camera solutions so that best and good practice and legal obligations are widely understood and compliance can be assessed and publicised.

2. There is an early warning system to **horizon scan** technological developments with implications for the scope and capability of surveillance, so that the Commissioner can assess whether regulation is sufficient and advise Government accordingly.
3. Information is freely available to the public and organisations about rights and responsibilities in relation to the operation of surveillance camera systems, so that they can be engaged in meaningful **civil engagement**/consultation to shape both national development of regulation and local decisions about surveillance of the public.
4. The **police** pro-actively share relevant information about their own operation of surveillance camera systems and use of data from their own and third party systems, so that the public are reassured about the proportionality and effectiveness of surveillance.
5. **Local authorities** pro-actively share information about the operation of a surveillance camera system in exercising any of its functions and any data sharing arrangements with third parties, so that the public are reassured about the proportionality and effectiveness of surveillance cameras.
6. There are 'soft levers' and incentives in place to encourage the **voluntary adoption** of the SC Code, so that the public can be reassured about the proportionality and effectiveness of surveillance in priority sectors.
7. Surveillance camera systems associated with protection of **critical national infrastructure** are operated in compliance with the PoFA, so that the public can be reassured of the proportionality and effectiveness of public surveillance as part of protecting the public
8. **Organisations involved in the manufacture, planning, design, installation, maintenance and monitoring of** surveillance camera systems are able to demonstrate their understanding and knowledge of and adherence to good and best practice, enabling system operators to comply with the SC Code.
9. Information is freely available about **training** requirements and provision for all those who operate, or support the operation of, surveillance camera systems or those who use the data for crime prevention/detection or public safety purposes, so that systems are used proportionately, effectively and transparently.
10. Greater synergies are established between **regulators** and those with audit and oversight responsibilities in connection with surveillance cameras so that public awareness of the SC Code and adherence to its provisions by stakeholders demonstrably raise standards of compliance and public confidence.
11. Information about surveillance camera regulation and how to achieve compliance can be accessed through a single well-publicised digital portal, so that awareness, adoption and assessment against the SC Code is promoted amongst interested parties.

## IMPLEMENTATION, TIMELINE AND GOVERNANCE

36. Each of the eleven strategic objectives will have a supporting delivery plan setting out specific action and outputs which contribute towards achieving the strategic mission. These delivery plans are owned by strand leads, each of whom is a recognised expert within their field and able to extend influence and leverage on behalf of the Commissioner. The priorities for actions and outputs to support each objective have been devised by the strand leads who have taken account of the resources available to support delivery.
37. The exception is objective 11 which relates to the establishment of a digital portal to provide a single and authoritative point of reference for information about surveillance camera system regulation. It might cover standards, good and best practice, legal obligations, training requirements and provision, and organisations which have completed self assessment or received third party certification. The Commissioner has retained ownership of this objective and will develop plans for its scope, resourcing and implementation by 2020.

## GOVERNANCE

38. The Commissioner owns the strategy and is accountable to Parliament and the public.
39. The strategy is driven by a Strategy Working Group, which is made up of the Commissioner, 10 strand leads – (see Annex B below), Home Office officials and a Strategy Manager. The group is chaired by the Commissioner and will meet at least twice a year to review progress against delivery plans and consider emerging issues, risks and opportunities for delivery of the vision and mission. Strategy Group meetings will be complemented by correspondence and meetings between leads and the Strategy Manager which enables ongoing scrutiny and challenge of the strategy.
40. Each strand lead acts on the Commissioner's behalf and is responsible for putting in place an effective governance arrangement to drive delivery of their strand, including reviewing progress and the availability of resources to meet requirements. These arrangements must be reported to the strategy for assurance purposes. The strand leads share a collective responsibility for the Commissioner for the coherence of the work strands in meeting the strategic vision and mission.
41. The Strategy Working Group reports into the Commissioner's Advisory Council which will support the Commissioner with advice on strategy priorities taking account of emerging issues, risks and opportunities for this three year strategy period and successor activity.
42. The Commissioner's office provides support and challenge to the strand leads and services the Strategy Group.
43. The Commissioner is appointed by the Home Secretary and is accountable to Parliament through the submission of an Annual Report which is laid in both Houses. The Annual Report will include an update on progress against the strategy during the reporting period, and detail of activity planned for the remainder of the strategy.

# The standards landscape

Town and country planning (general Permitted Development )  
Order 1995 Part 33

Scottish Government CTV 11 NSINCP 104 Public CCTV Managers Association  
Local Government End-users PSIA LGA MPEG BS 8243  
IEC 62676 Suite Testing CCTV Image quality CAST  
Department of Transport BS 8495 JPEG Sfs SLP15  
UKAS i-LIDS ISO/DIS 22311 Export Interoperability CEN/CENELEC TC4  
BS 8591 BSIA SYS 14 Information Commissioner Office SSAIB SS 2003  
The Human Rights Act 1998 CAST - Testing CCTV Image Quality  
ONVIF Protection of Freedoms Act 2012  
CCTV User Group BS 8418 Surveillance Code of Practice ISO/IEC JTC 1  
CENELEC TC/79 – WG7 ETSI EN 300 440 Equality and Human Rights Commission  
Town Councils Codes of Practice for the operation of CCTV EN 50132 suite  
NALC  
IEC TC/79 – WG12 Public Space CCTV Operator License  
CTV 15 BS 5979 CCTV National Standards Forum EN 50518 suite  
ICO - Code of Practice  
Guidelines to the maintenance and servicing of CCTV Systems Retrieval of Video Evidence and Production of Working Copies from Digital CCTV Systems BS 7958  
Security Industry Authority ACPO CCTV Operational Requirements (OR) Welsh Assembly  
CENELEC TC/79 – WG 14 Civil Traffic Enforcement Certificate of Approved Devices  
Form 197 - CCTV privacy masking guide



**National Surveillance Camera Strategy Governance Structure**



