



**SURVEILLANCE CAMERA
COMMISSIONER**

National Surveillance Camera Strategy Outline for discussion

January 2016

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National Surveillance Camera Strategy

This paper outlines the approach that the Surveillance Camera Commissioner (SCC) is seeking to adopt in developing a strategy to further develop the impact of the Surveillance Camera Code of Practice (POFA Code) under the Protection of Freedoms Act 2012.

This paper asks the Advisory Council to consider the paper and advise with regard to the proposals recommended within it.

Vision

The public are reassured that surveillance cameras in public places are there to protect and look after them – rather than look at them – and are operated in a way which is proportionate, effective in meeting a stated purpose and transparent.

Mission

The SCC will deliver this strategic vision by March 2020 through:

- Providing direction and leadership in the surveillance camera community with the aim of promoting best practice through compliance with the principles and guidance associated with POFA Code
- Promoting best practice in all sectors of surveillance camera operation, whether the operator is a relevant authority under a statutory duty to have regard to the POFA Code or is free to follow the Code on a voluntary basis.

End users

The Protection of Freedoms Act refers to relevant authorities, such as the Police Forces and Local Authorities, as those who are responsible for their surveillance system. Police Forces and Local Authorities are end-users. They are the ones who commission systems, are responsible for the data they collect and disseminate it as required to law enforcement agencies.

What needs exploring here is who the other end users are so that we can consider the breadth and depth of surveillance camera coverage. This is to ensure that they can be targeted so that they are aware of the POFA Code and can then consider how to ensure that their system is proportionate, transparent and effective.

- Local Authorities
- Police
- NHS
- Prisons
- Educational establishments
- Outsourced services
- Retail outlet
- Shopping centres
- Highways agency
- Government estate
- Residential Social Landlords
- TFL
- Rail and Transport companies
- Others

The POFA Code charges the SCC with encouraging all users of surveillance within a public space to voluntarily adopt the code. There has already been progress with a number of the voluntary adopters. This includes NHS Protect who will be auditing trusts to check compliance against the POFA Code; Association of University Chief Security Officers who are promoting the POFA Code to its members; ATOC who have included the 12 principles in their guidance to Train Operating Companies and others.

Any Strategy for 2016/2017 will need to consider the various equities of such groups, how they interlink with each other, with particular reference to delivery of an end product. Lessons learnt today suggest that by focussing on the correct soft levers (e.g. third party certification for local authorities) we are able to elevate the adherence to recognised standards.

Technology

The surveillance camera sector is massive and is an industry that will continue to grow. We have already seen the introduction of devices other than CCTV e.g. ANPR, dash/helmet cams, body worn video and more recently unmanned aerial vehicles. All now equipped with high definition cameras and in the future will probably have live streaming capability.

Technology companies are fast improving automatic facial recognition technology and other analytical capabilities. These uses need to be within the regulatory framework.

The SCC has formed a Horizon Scanning Committee chaired by Professor Lacey operating under Home Office Centre for Applied Science and Technology. Any developing strategy must surely be informed by that group to support ongoing development and provide reassurance to society that regulation can keep pace with technological development.

Stakeholders

The plethora of stakeholders that impact on this agenda is large. The previous [National CCTV Strategy 2007](#), arguably a forerunner to the role of SCC, proposed the formulation of a more holistic strategy that sought to harmonise development and delivery of surveillance product. There is much within that Strategy that still holds good today. The SCC believes that a programme of work to consider that approach and its potential to deliver the desired outcomes should underpin the approach for 2016.

Regulators

The Surveillance Camera Commissioner is the latest addition to the Information Commissioner and the Office for Surveillance Commissioners as part of the regulatory landscape. That addition has been dictated by the burgeoning use of surveillance camera systems and associated technologies by both the State and other organisations in public space. Any developing strategy will need to maximise the benefits of the strong working relationships across that Community.

Work strands we are aware of

- Assistant Chief Constable Bates leading National Police Chiefs' Council CCTV Working Group
- Assistant Chief Constable Kennedy leading National Police Chiefs' Council ANPR National User Group
- Chief Constable Marsh leading Body Worn Video User Group
- SCC Standards Board
- Public CCTV Managers Association – involved in setting vetting standards and developing a memorandum of understanding
- Local Authorities – exploring surveillance camera systems operating outside of regulatory compliance
- Information Commissioner's Office – promotion and consistency of Privacy Impact Assessments and pursuing licensing conditions e.g. taxis
- BSI – standards promotion
- Forensic Science Regulator – forensic standards on data retrieval
- Home Office Centre for Applied Science and Technology – Horizon Scanning
- CCTV National Standards Forum – Now working within SCC's meeting cycle and reporting framework

This list is by no means definitive. Greater co-ordination will provide visibility to each stakeholder.

Interdependencies

This list underpins the importance of providing opportunities for key stakeholders to engage, in a co-ordinated holistic fashion, with the broader surveillance camera community.

Recommendations

- Advisory council support the Vision outlined

- Advisory Council support development work of a comprehensive 2016/2017 Strategy that seeks to develop holistic approach to raising standards.

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