

INDEPENDENT MONITORING SCHEME FOR CCTV USAGE



Sussex
Police
Authority

OCTOBER 2009 – 2013

Independent CCTV Monitoring Scheme

Introduction

Closed Circuit Television (CCTV) has proved to be a useful tool to deter and detect crime. However, if misused, it can have a negative impact on public confidence. The Authority therefore feels it is in the public interest to have an effective independent oversight of the CCTV that is managed by Sussex Police in Sussex.

Much of the work carried out by CCTV systems is of a confidential nature, in accordance with the provisions of the Human Rights Act 1998 and the Data Protection Act 1998, together with other legislation.

This Scheme is the first of its kind within Sussex. The Authority has appointed a Lead Member for the Scheme and oversight of the Scheme will be performed by the Authority's Professional Standards Committee. This Scheme will be reviewed every four years.

The Independent CCTV Monitoring Scheme utilises the skills of independent volunteers from around the county who have been trained, security cleared and managed by the Authority to perform this important public scrutiny role.

Aims of the Independent CCTV Monitoring Scheme

Some of the benefits to be derived from a scheme are summarised below:

- 1) Efficiently administered, the Independent CCTV Monitoring Scheme will promote public confidence in the Sussex Police CCTV system's integrity and transparency. Additionally, regular external scrutiny will help to ensure that the use of public place CCTV is more widely accepted.
- 2) Independent CCTV Monitoring Visitors are able to express unvoiced opinions or concerns reflective of the local community, and these views will be free from political or internal pressures. This will also promote continuous improvement and bring innovative ideas.

Implementation of a Scheme

Recruitment and Selection of Independent Monitoring Visitors

The commitment to diversity is clearly demonstrated in Sussex Police Authority's recruitment process for any volunteer or member of staff. Sussex Police Authority places equality at the centre of its work when forming policy or strategy, providing a service, consulting with the public or employing people.

Prospective visitors should be independent persons of good character who are able to make informed judgments in which the community can have confidence.

Volunteers for the Independent CCTV Monitoring Scheme will initially be recruited from the Authority's existing group of Independent Custody Visitors.

This arrangement is efficient and effective, as Independent Custody Visitors have already been selected following a rigorous selection process, have been appropriately vetted and possess the following attributes that are wholly appropriate for this separate role:

- a) be of good character
- b) have credibility within the local community
- c) have no criminal record
- d) promote respect for the decisions they make
- e) be intelligent and inquisitive
- f) be enthusiastic and keen
- g) have a general experience of life with a mature and responsible attitude

An officer of the Authority, with the assistance of the Lead Member for Independent Monitoring of CCTV, will recruit, select and appoint Independent Monitoring Visitors.

As is the case for the appointment of Independent Custody Visitors, to avoid potential conflict of interest the following people are excluded from becoming Independent Monitoring Visitors:

- a) Members and officers of Sussex Police Authority
- b) Police officers and police staff
- c) Those currently involved in the criminal justice system (e.g. magistrates)

Tenure

Visitors will be appointed for an initial period of one year, with a maximum term of two years. All appointments will be subject to a probationary period of six months.

Sussex Police Authority has the right to terminate an Independent Monitoring Visitor's appointment at any time.

Co-ordination of the Scheme

Similar to Sussex Police Authority's Independent Custody Visiting Scheme, this Scheme will be co-ordinated by an officer from the Chief Executive's office at the Police Authority. The officer will ensure that the Scheme operates correctly and that visits are arranged and carried out monthly, at the Police Monitoring Centres at Haywards Heath and at Brighton. Substitute Visitors will be identified during periods of holiday or sickness.

Primary Elements of an Effective Independent Monitoring Scheme for CCTV

a) Frequency of Visits and Number of Visitors

In order to be effective, the frequency of visits should be sufficient to provide an accurate, ongoing assessment of CCTV activities without being so frequent as to disrupt the operation of the control room. One visit per month is recommended to each Police Monitoring Centre (Haywards Heath and Brighton).

Visitors must always inspect as a pair. This will help ensure that there is a degree of mutual support, which may result in a more effective and productive examination, together with corroboration of events reported. This will be particularly relevant should anything untoward arise from the visit. In order to achieve one visit per month, a total team of 12 visitors is required (six for Brighton, six for Haywards Heath). This prevents the frequency of visits becoming too onerous for individual visitors, or so infrequent as to make familiarisation with the CCTV operation difficult. Each pair of visitors will hence make a visit every three months.

An additional four visitors will be appointed from outside the existing pool of ICVs, with under-represented groups specifically targeted to ensure a good cross-section of the community is involved in the CCTV monitoring process. This will be achieved within 12 months of the launch of the scheme.

b) Format of visits

In order for the Independent CCTV Monitoring Scheme to be as

credible as possible, visits to the Brighton and Haywards Heath Police Monitoring Centres will be both unannounced and scheduled.

1) Unannounced

Using this method, Visitors are authorised to visit the Police Monitoring Centre unannounced, at any time. The obvious strength of this method is its completely random nature and the inability of the CCTV control room staff to 'prepare' for the visit. Such a method conveys a powerful message to the communities of Sussex.

2) Scheduled

In order to maximise the value of a visit, it is also beneficial for the CCTV Manager/Supervisor to spend some time with the Visitors and discuss any matters if needed. It would be necessary to give 24 hours' notice of an intention to visit. It will be the responsibility of visitors to make contact with the Police Monitoring Centre and arrange a mutually convenient time.

c) Rota

A rota of visits to both the Brighton and Haywards Heath Police Monitoring Centres will be drafted in advance for a period of one year. The rota will be prepared by an officer at Sussex Police Authority.

It will be the responsibility of the individual Visitors to arrange a mutually convenient date and time for the visit to take place.

d) Duration of Visits

In order to ensure a thorough inspection, visits should take at least 30 minutes, but no longer than two hours to prevent them becoming particularly disruptive. It will be advantageous for a management representative to be present in order to answer questions concerning the overall management and administration of the system.

Managers are recommended to allow Independent Monitoring Visitors time to observe and talk to CCTV operators about monitoring activities. Independent Monitoring Visitors may well wish to test, through the actions of the CCTV operators, the policies identified in the Sussex Police Code of Practice for CCTV usage.

e) Additional Visits

Additional visits may be undertaken at the request of the CCTV centre manager, as this can be particularly useful, for example, where a complaint from a member of the public has been received regarding the use of public place CCTV. The investigation into the complaint may benefit from an independent assessment of facts, or any other incident requiring an external perspective.

f) Initial Training and Annual Meeting

Training for Independent Monitoring Visitors is essential, together with a period of familiarisation of the CCTV system. Although Visitors will

not require a detailed knowledge of the technology used, they will need a good understanding of the Code of Practice for CCTV operators. It is how the system is used by operators and the level of conformity with rules and procedures that Independent Monitoring Visitors will monitor.

Training, therefore, should cover:

1. How the CCTV system operates – a summary of the technology used.
2. The Sussex Police CCTV Code of Practice.
3. Partners and their relationship with the CCTV system in Sussex.
4. Geographical areas covered by the system.
5. Legislation affecting the operation of CCTV.
6. How the Independent CCTV Monitoring Scheme will operate and its objectives.
7. The importance of the Independent CCTV Monitoring Scheme and its impact on public confidence in policing.
8. The importance of confidentiality.

g) Annual Review Meeting

Once the Scheme becomes fully operational, there will be an opportunity to have an annual review meeting (with Sussex Police) to consider the following factors:

- 1) The strengths and weaknesses of the Independent CCTV Monitoring Scheme.
- 2) Particular successes and failures.
- 3) Future development of the Scheme.
- 4) Future development of the CCTV system in general.
- 5) Other issues of concern.

h) Areas to be visited and observed in the Police Monitoring Centre

For a truly independent and effective Independent CCTV Monitoring Scheme, access to all areas of CCTV operation must be granted. This should include spot checks on randomly-selected digital video footage from the system hard drive. All aspects of public place CCTV usage should be opened up for scrutiny.

It has been argued that such unlimited access could lead to a breach of the provisions of the Human Rights Act. However, provided a CCTV

system is controlled in accordance with a Code of Practice and complies with the provisions of the Data Protection Act, the introduction of a well-managed Independent CCTV Monitoring Scheme will help to ensure compliance with human rights matters.

A copy of the Code of Practice will be made available to each Visitor to enable them to gain an understanding of how the CCTV system operates. This would enable Visitors to pick areas of interest to inspect and provides a focus and direction.

The majority of inspections should focus around issues of privacy and the investigation of any complaints received. According to the national CCTV Users' Group, these are areas of particular concern to the public.

i) Reporting on visits (written records)

It is vital that a written report is produced by the Independent Monitoring Visitors at the end of their inspection. Visitors will be provided with forms for completion and they should be given access to a private area away from control room staff in order to put together their report. The completed reports will be sent to the Chief Executive's office, who will ascertain whether any actions need to be taken following the visits. A copy of the report will be also be sent to the Head of Communications Department at Sussex Police so that the necessary actions/changes can be implemented promptly. The findings will also allow Visitors on subsequent inspections to assess whether areas of concern/non-compliance have been rectified.

j) Professional Standards Committee

The Sussex Police Authority Professional Standards Committee will be responsible for organising and overseeing the delivery of the independent monitoring of public place CCTV in Sussex. The Committee will keep the arrangements under review and revise them regularly enough in line with technological advances and national developments.

Conclusion

A successful Independent CCTV Monitoring Scheme will prove to be an asset to policing in Sussex.

Recruitment of the correct volunteers, who are continually motivated and encouraged to challenge the way in which public place CCTV systems are operated, can be invaluable. Visitors can prove to be an additional resource to call upon to assess or develop new ideas and can form a vital part of the system's integrity.

Above all, the Scheme aims to increase public confidence in local policing.

EXAMPLES OF CHECKLIST PROFORMAS

CHECKLIST FOR INDEPENDENT MONITORING VISITORS' INSPECTION

- 1) Ensure no deliberate monitoring of people carrying out legitimate business.
- 2) Availability of the Sussex Police Code of Practice on CCTV.
- 3) Availability of the Code of Practice for inspection by the general public.
- 4) Details of complaints received from members of the public and the action taken.
- 5) Ensure that the CCTV Manager undertakes regular checks of the system as well as regular supervision of CCTV Operators.
- 6) Access to the control room is restricted to authorised personnel.
- 7) Police officers are only allowed to review footage with the correct authorisation.