

Subject: Provision of Body Worn Video Cameras

Report to: Policy & Resources Committee 23rd July 2019

Report by: Miranda Lee Head of Customer Services

SUBJECT MATTER/RECOMMENDATIONS

This report outlines the requirements and options considered for the provision and introduction of Body Worn Video Cameras to relevant officers across the organisation as an additional form of protection against potential harm from lone working and/o anti-social behaviour and abuse

Recommendations

It is recommended that Committee:

- 1) delegate authority to Officers to proceed with the proposal as outlined in Section 3 of this report, namely to proceed with the fully hosted and managed service provision for the introduction and use of Body Worn Video Cameras for designated staff within this organisation
- 2) approve budget provision as set out in Section 4.2 and 4.3 of this report

1. INTRODUCTION/BACKGROUND

- 1.1 In 2017 following a review of PPE (personal protective equipment) needs across the organisation undertaken by the Health & Safety officer, it was highlighted that a number of roles within the organisation would benefit from additional protection by wearing body worn video cameras.
- 1.2 The initial services and roles identified were within Parking Services and Environmental Services who were to undertake a trial of suitable devices which could then be recommended, procured and rolled out to other services across the organisation.
- 1.3 The initial trials were held within the Parking Services Team and Environmental Team. Although limited with some initial IT complications progress was made, and some devices successfully trialled including the development of draft council policies needed to be in place to ensure the safe use the cameras.
- 1.4 In December 2018, the Health & Safety Sub Group identified additional roles across the organisation which would benefit from having the protection of body worn video cameras. In addition to putting forward a proposal to procure a body worn video camera solution for this authority to manage as an in-house solution, it was also agreed to seek an option for a managed & hosted solution from a local authority already

providing body worn video cameras for their staff. Great Yarmouth Borough Council already works in partnership with the Borough Council of Kings Lynn and West Norfolk who already have a solution in place and the necessary infrastructure to host and manage this type of solution.

2. BUSINESS REQUIREMENT

2.1 The Health & Safety Sub Group identified the following requirements across the organisation;

Table 1

Service Area	Roles
Customer Services – Parking	Civil Enforcement Officers
Customer Services – Revenues	Property Inspector
Environment Services	Environmental Rangers
Property Services	Market Inspectors/surveyors
Planning	Enforcement Officers
Housing	Caretakers
Housing	Environmental Crime Officer

2.2 There are a number of benefits associated with the use of body worn video cameras by organisations such as ourselves, these include;

- Making staff feel more secure and safe whilst undertaking their duties
- Act as a visible strong deterrent reducing the number of incidents of aggression towards staff
- Provide admissible evidence helping to identify and bring to account perpetrators and witnesses of an incident that has taken place
- Identifies possible training and development of staff, assisting with complaint handling and resolution

3. PROPOSAL

3.1 The Senior Management Team considered 2 options to recommend proceeding with for the provision of a body worn video camera solution.

3.2 Option 1 – To proceed with procurement and implementation of an ‘in-house’

solution, and Option 2 - To proceed with the proposal put forward by our request from The Borough Council of Kings Lynn and West Norfolk to provide us with a hosted and managed service.

3.3 In consideration of these options, the decision was made to recommend proceeding with Option 2, the proposal put forward by The Borough Council of Kings Lynn & West Norfolk. This was based on the following:

- They already have the infrastructure in place and provide this technology solution to their staff
- They have an established CCTV Control Centre with secure storage and access to data and can respond 365 days of the year, 24 hours per day
- They are fully qualified and accredited to the CCTV operational and management requirements
- They have provided a competitive service provision cost

3.4 The provision of a hosted and managed solution includes:

- The provision of devices, hardware, software, licencing and connectivity to their secure environment
- A hosted and secure environment where footage will be able to be downloaded on a daily basis via a secure isolated VPN network
- Management and control of the data for a period not exceeding 1 month
- As data controller they will manage all access requests only releasing captured footage for a relevant reason to a relevant person

3.5 Great Yarmouth Borough Council have the responsibility of producing the supporting policies and procedures which may need to differ dependant on the role.

3.6 Staff issued with a body worn video camera must use it specific to the individual role and usage in accordance with the policies and procedures in place.

- To be decided based on the specific nature of the roles, staff will either turn the device on which will remain on through the course of their shift or turn on only when undertaking certain duties, or at specific times throughout the working day as may be appropriate
- A number of docking stations will be available in easy access of the services identified requiring a device
- Each day, the device should be docked which will transmit securely to a main control unit based in our council officers which will then upload securely to the hosted environment

3.7 The device to be supplied is from one of the leaders in enforcement & security services providers, IndigoVision. Their latest model comes with 14 hours of evidential

quality HD video and audio recording, easy on/off switch and up to 96 hours battery standby and multiple mounting options. The device captures and records video and audio footage when switched on.

Because of the volume of personal data and potentially sensitive personal data that these cameras will process, and the fact that they are mobile, it is important to have appropriate robust technical and physical security in place to protect this information.

Device security features

- FrontLine 2 hardware and software are designed from an early stage to guarantee security from camera to courtroom.
- FrontLine 2 burns the date, time, device and frame number into every frame of footage, allowing for clear indexing. AES encryption guarantees the identity of the badge and manager, preventing eavesdropping from unauthorised individuals.
- A FrontLine 2 cannot be accessed without the correct RSA authentication key, which can be uniquely assigned to each badge, shared between several badges, or even shared across multiple Video Managers in one organisation.
- FrontLine 2 controls which users can gain access. This means the FrontLine 2 runs as a secure service that cannot be directly accessed from the user's logon. Additionally, audit logs are recorded for every user action on the system, allowing traceability for potential misconduct. When footage is exported to be burned to DVD, a signature is burned into the exported video clip, linking back to the user, date, time and other details about the export. Every user can have different access control settings, preventing unauthorised access to sensitive functions such as footage deletion.
- FrontLine 2 automatically implements the customer's configured data retention and deletion policies. The FrontLine 2 can delay data deletion requests to prevent malicious evidence removal, according to configured policy

- 3.8 The Borough Council of Kings Lynn and West Norfolk are certified and accredited in:
- BS7958 CCTV Management & Operation
 - SCC (Surveillance Camera Commissioner) Surveillance Camera Code of Practice
 - SIA ACS Approved Contractor Status

4. FINANCIAL IMPLICATIONS

- 4.1 As part of the review of PPE across the organisation a budget was made available in the sum of £18,000.
- 4.2 The total budget provision required for this solution is £21,615.52 resulting in a shortfall of £3,615.52.

- 4.3 There is also an associated annual ongoing budget requirement of £4,374.
- 4.4 There are no procurement considerations that need to apply. Section 1 of the Local Authorities (Goods and Services) Act 1970, states that:

A local authority and any public body within the meaning of this section may, in relation to any relevant trading operation carried on by the authority, enter into an agreement for all or any of the following purposes,

(a) the supply by the authority to the body of any goods or materials;

(b) the provision by the authority for the body of any administrative, professional or technical services;

5. LEGAL IMPLICATIONS

- 5.1 The Surveillance Camera Code of Practice has been issued by the Secretary of State under Section 30 of the Protections of Freedoms Act 2012. It provides guidance on the appropriate and effective use of surveillance camera systems by relevant authorities who must have regard to the code when exercising any functions in relation to 'overt' surveillance. The code of practice also provides guidance relating to considerations of other relevant legislation including the Freedom of Information Act 2000 and the Human Rights Act 1998.

- 5.2 The code of practice set out guiding principles that should apply to all surveillance camera systems in public places. These are designed to provide a framework for operators and users of surveillance camera systems, in the case of this report this means the use of body worn video cameras, so that there is proportionality and transparency in the use of surveillance. There are 12 guiding principles:

- 1) Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need
- 2) The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified
- 3) There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints
- 4) There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used
- 5) Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them
- 6) No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged
- 7) Access to retained images and information should be restricted and there must be

clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes

- 8) Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards
- 9) Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use
- 10) There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published
- 11) When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value
- 12) Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date

The Surveillance Camera Commissioner provides a helpful self-assessment tool which enables us to demonstrate how we comply with the 12 guiding principles of the code of practice and helps to identify any areas where further action is required to fully conform to the principle(s).

In addition, the Surveillance Camera Commissioner also provides guidance and appendices on carrying out and completing the required Data Protection Impact Assessment which will complement our required Privacy Statements.

5.3 The Information Commissioner's Office has issued a data protection code of practice covering the use of CCTV which has been updated following the introduction of the data Protection Act 2018.

5.4 The code provides good practice advice for those involved in operating surveillance solutions and has a specific section relating to the use of body worn video cameras. These types of devices are likely to be more intrusive than normal CCTV because of their mobility in use. Careful consideration needs to be given to justify its use taking into account whether it is proportionate, necessary and addresses a pressing social need. The code of practice sets out the Information commissioner's recommendations on how the legal requirements of the Data Protection Act can be met. When considering the development of our accompanying procedures and processes we will need to ensure we take account of the following:

- Ensuring effective administration – setting a clear basis of processing personal information procedures on how the information is handled, for what purpose and by whom

- Storage and viewing of surveillance system information
- Disclosure – having arrangements in place to restrict the disclosure of information in a manner that is consistent with the purpose intended
- Subject Access Requests – Individuals whose information is recorded have a right to be provided with that information or, if they consent to it, view that information
- Freedom of Information – it is possible that Freedom of Information requests may be received and determination should be made as to whether these are actually Subject Access Requests
- Data retention – the amount of time the data is held should be limited
- Staying in control – continual review of requirements and subject to regular audit

5.5 Because the use of body worn video cameras are considered more intrusive than other types of CCTV surveillance due to their mobility and increased likelihood of recording wider collateral data, section 4.8.1 of the Surveillance Camera Code of Practice suggests operators should consider approved operational, technical and competency standards relevant, in this case for use of body worn video cameras.

6. RISK IMPLICATIONS

6.1 In relation to this proposal the highest area of risk is ensuring we comply with the legalities as outlined within section 4 of this report.

In mitigation of this risk, the proposal for a managed service solution is from an 'Approved Contractor of the Security Industry Authority'. There is a CCTV control centre already hosting a secure environment for this type of solution with the IndigoVision Body Worn Cameras already in operation. This provides an element of risk in that a third party will be delivering this service on our behalf, however, this risk is further mitigated by their accreditation and the service provision would have the necessary service level agreements in place.

7. RECOMMENDATIONS

It is recommended that Committee:

- 7.1 delegate authority to Officers to proceed with the proposal as outlined in Section 3 of this report, namely to proceed with the fully hosted and managed service provision for the introduction and use of Body Worn Video Cameras for designated staff within this organisation
- 7.2 approve budget provision as set out in Section 4.2 and 4.3 of this report

Background papers: [Surveillance camera code of practice - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/surveillance-camera-code-of-practice.pdf)

[Information Commissioner's Code of Practice](#)

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	Yes
Section 151 Officer Consultation:	Yes
Existing Council Policies:	Yes
Financial Implications:	Yes as outlined
Legal Implications (including human rights):	Yes – Surveillance
Risk Implications:	Yes as outlined
Equality Issues/EQIA assessment:	N/a
Crime & Disorder:	Yes
Every Child Matters:	N/a