



REVIEW OF THE ADVISORY COUNCIL

Issue:

To review the recommendations following a review of the membership and terms of the Surveillance Camera Commissioners' Advisory Council.

Background:

The Surveillance Camera Advisory Council was set up in order to "support the Surveillance Camera Commissioner (the Commissioner) by considering and offering advice on matters related to the Commissioner's functions". This is a broad remit and was right for the time given the role was only recently created and there was a need to engage a wide range of stakeholders in the process. The detailed list of responsibilities and composition of the Council further reinforce the view that the remit and membership is broad. Whilst there have been minor changes to the membership, this is an opportunity to revamp the Council to address the challenge of providing appropriate governance to the forward work programme.

Review:

The terms of reference¹ commit the Council to a review (paragraph 9) every 3 years. This review is just over the 3 year period but is timely given the work on the national surveillance camera strategy and the desire to give the strategy appropriate governance. Especially as the strategy will form the cornerstone of the Commissioner's forward work programme.

The review also seeks to provide clear water between the governance of the national strategy and the work of the strand leads – some of whom currently occupy both positions – and in governance terms, that is inappropriate.

Current membership:

¹ The terms of reference will be reviewed following the Council's consideration of the above proposal.

The current membership has representatives from the following areas of expertise:

1. Accreditation and certification
2. Surveillance camera manufacturer and installation
3. Surveillance camera management and use
4. Data protection
5. Human rights
6. Civil liberties
7. Police
8. Local authority
9. Scotland
10. Wales
11. Covert surveillance

Assessment of each area

1. Now that the third party certification scheme is up and running, and there is no immediate plan to have it accredited as a UKAS scheme, it is arguable that the certification bodies are not required. Yet they are the bodies on the ground assessing the difference the code makes.
2. BSIA are the only representative in this area, yet the Commissioner has seen an interest from the manufacturing sector to have direct involvement and this is a strand within the strategy. What about the SIA and the BSI given focus on standards?
3. The PCMA, CCTV User Group and the CNSF have been the representatives. Whilst these three groups begin to reflect the multitude of different sectors out there e.g. shopping centres, universities and healthcare, it is not clear if there are other groups out there that better reflect the diverse representation or can better support the work in the strategy to promote the code to wider than just public authorities.
4. Given the overlapping interest of the ICO this must continue.
5. As the Equality and Human Rights Commission has only been represented at one meeting, it is right that we consider an alternative approach. Should we consider an expert practitioner e.g. a lawyer?
6. Big Brother Watch have made a significant contribution to scrutiny as have the private meetings with Liberty and so this area should be retained although

membership needs looking at. Privacy International, given the recent engagement, has also been very informative.

7. As in 3, given the focus of the strategy is much wider, need to consider the needs of the relevant authorities against the progress of voluntary adopters.
8. As 7
9. There is ongoing interest for local authorities within Scotland and so representation on the Council is necessary to harness this interest.
10. Wales must be retained as they are covered by the strategy.
11. As the Office for Surveillance Commissioner is soon to be integrated with other covert commissioners, it will no longer exist and should therefore membership should be reconstituted to reflect the emerging body.

- a) Also on the Advisory Council is a representative of the Police and Crime Commissioners and as they represent a bridge to communities, and are a relevant authority in themselves, this must continue
- b) Neil Cohen from CAST. Technological developments are so fast paced, they are worth keeping abreast of although Neil leads a strand so may consider finding alternative representation.

What's missing?

- I have already mentioned direct engagement with manufacturers as one area where the Council could be strengthened.
- Recent engagement with academia has illustrated the value that they bring and so recommend inclusion of an academic.
- Criminal justice system to ensure use of camera systems is effective

Membership proposal:

Area of Expertise	Recommendation	Detail	Number of places
Accreditation and certification	RETAIN	To trade and support emerging work such as BWV standards.	3
Surveillance camera manufacturer	STRENGTHEN	Alongside BSIA, include manufacturer	2

and installation			
Surveillance camera management and use	AMEND	Consider representation from wider representation of system operators	3
Data protection	RETAIN	Information Commissioner representative	1
Human rights	AMEND	Consider lawyer or academic representative for compliance issues	1
Civil liberties	RETAIN	Continue engagement and support from Big Brother Watch and determine if other group(s) could also contribute.	2
Police	RETAIN	Current NPCC lead speaks on behalf of all police forces across different types of surveillance camera systems and sits alongside the Police and Crime Commissioner representative.	2
Local authority	RETAIN	Need to consider representative who can represent Local Authorities (including town and parish councils) on all types of surveillance camera systems	1
Scotland	RETAIN	Given interest from Scotland, re-engage	1
Wales	RETAIN	Given strategy applicable to Wales, re-engage	1
Covert surveillance	REPLACE	OSC will cease to be; engage representative from newly constituted body	1
Academia	ADD	Dr Peter Fussey has an interest	1
Technology	ADD	Given the rate of developments	1

		of both cameras and back office functions, a technology expert should be added	
Criminal Justice System	ADD	To ensure cameras and data is effective for law enforcement purposes, someone should be added.	1
Home Office	ADD	A senior representative from the Home Office policy unit (different from the rep on the Strategy Group)	1
Total			22

Recommendation:

- For the Advisory Council to consider the membership proposal
- To advise on areas that are missing
- To advise on the size/membership of the group
- To consider organisations/individuals that could support the appropriate governance of the national strategy

