

**SURVEILLANCE CAMERA COMMISSIONER'S ADVISORY COUNCIL –
19 SEPTEMBER 2016
NATIONAL SURVEILLANCE CAMERA STRATEGY**

Purpose

1. To provide the Advisory Council an update on progress of the project to develop a National Surveillance Camera Strategy for England and Wales since its last meeting in April 2016, and facilitate discussion over strategic direction, governance and implementation, as well as the timetable for consultation and launch of the strategy.

2. The strategy has been developed with the support and commitment of a group of expert work strand leaders (**Annex A**) each of whom has taken ownership of a strategic objective. A draft of the Strategy document is attached at **Annex B**, along with a including a table which illustrates examples of deliverables to support its implementation (**Annex C**). The strategy development project timeline is attached at **Annex D**.

3. The Advisory Council is invited to consider:

- **If the vision and mission set the right direction and level of ambition.**
- **If the proposed scope is broadly correct.**
- **Whether the draft objectives are clear and achievable.**
- **Are there any objectives and work strands missing which might make a significant contribution towards progress between now and 2020.**
- **Does the strategy have sufficient governance to ensure it can be implemented successfully.**
- **Whether the draft strategy is likely to uplift compliance with the POFA Code.**
- **If there are any fundamental reasons not to start wider consultation over the draft strategy in October 2016.**

4. The Advisory Council is also invited to provide any written comments on the detail of the draft strategy by Friday, 23 September

Background

5. The Protection of Freedoms Act 2012 (POFA) put in place statutory arrangements for the further regulation of CCTV and other surveillance camera systems in public places in England and Wales. These arrangements are intended to bring coherence to regulation, and to clarify and reinforce understanding of mandatory requirements, including those under the Data Protection Act 1998 and the Private Security Industry Act 2001.

6. The SCC's statutory role is to encourage compliance with a Code of Practice issued as guidance under POFA (POFA Code) and provide advice about it. His

mission can be characterised as being to ensure that surveillance cameras in public places are used effectively, efficiently and proportionately, so that the public can be reassured that those cameras will keep them safe and secure without interfering with their right to privacy.

7. Parliament has agreed a list of relevant authorities in England and Wales who must follow a duty to have regard to guidance in the POFA Code (S33(5) of POFA), and also agreed that other organisations operating surveillance cameras in public places “..... are [to be] encouraged to adopt [the POFA] code and its guiding principles voluntarily and make a public commitment to doing so.” (Para 1.17 of POFA Code)

8. Since the SCC's appointment in March 2014 good progress has been made in publishing guidance and developing tools to assist those who want to follow the POFA Code. This would not have been possible without the support of the Advisory Council, the Standards Group and many other partners in the surveillance camera community.

9. When the Advisory Council met in January 2016, it agreed the SCC should develop a comprehensive national surveillance camera strategy that seeks to draw together a holistic approach and coherent action to raise standards and compliance with legal obligations in line with the 12 guiding principles in the POFA Code.

10. Home Office Ministers have indicated their support for the development of a strategy to improve compliance with the POFA Code.

Progress

11. A Strategy Group was established to take this work forward. It comprises the SCC, experts to lead development of various strands of work, the Home Office and members of the SCC's support team. The work strands and leads are set out in **Annex A**. The Strategy Group met for the first time on 6 March. A Project Manager was appointed in June.

12. The Strategy Group has developed a draft strategy document which includes a vision and mission, scope, and a series of objectives for the period from April 2017 to March 2020 (**Annex B**). The vision and mission are clearly focused on a collaborative approach towards using the POFA Code to promote proportionate, transparent and effective surveillance which protect the public and meets legal obligations. The scope of the strategy has been drafted to be consistent with the regulatory framework under POFA, and in recognition that the limited resources available for delivery between 2017 and 2020 inevitably require prioritisation. The work strands support delivery of each strategic objective.

13. Against a challenging timetable and with the commitment of the strand leads and their own working groups, good progress has been made on high level delivery plans for the work strands which start to map out the implementation of objectives and how success might be measured. As might be expected in what is a complex project dependent upon partnership working, progress across the work strands has been

variable. Further action is in hand to support the completion of a full set of high level delivery plans before the anticipated start of public consultation in early October. This will be challenging in some of the work strands, and subject to progress, the Strategy Group will have to come to a view on overall readiness to start consultation.

14. The Strategy Group considers that an information hub for surveillance camera regulation would improve communications to raise awareness, adoption and assessment against the POFA Code and its guiding principles. This chimes with feedback from SCC/British Standards Institute workshops in 2014 and research conducted in 2015/16. This cross-cutting work strand will be dependent upon scoping delivery plans from the other ten work strands, and agreeing ownership and resourcing of the hub. The SCC has retained ownership of this work strand and proposes to develop implementation plans by March 2018. This would enable resources at this early stage to be focused on the other ten work strands to develop materials and activity which would subsequently be placed on the information hub.

15. Delivery plans are being developed to ensure that this strategy helps to galvanise collaboration and partnership effort toward protecting the public, rather than being just a statement of intent. These plans should also add to the evidence base wherever possible; thus informing good practice and any future recommendations to the Government about the regulatory framework.

16. Furthermore, a proposed governance structure has been developed as an integral part of strategy implementation; this is set out in the draft Strategy Document (**Annex B**). This structure is intended to ensure that collective efforts are prioritised, resources identified, and progress can be reported and scrutinised.

17. As mentioned above, the Strategy Group is still working towards a full set of high level delivery plans. Some illustrative examples of the kind of activity currently being considered as part of strategy implementation are set out in **Annex C**.

Next Steps

18. Subject to your views, the SCC intends to continue developing the strategy and delivery plans, and to undertake a wider consultation over the draft strategy.

Annex D provides a project timeline for this work towards a strategy launch in December 2016.

19. The SCC plans to undertake a six week consultation over a draft strategy in October and November 2015. This plan is based around an online survey, a set of events and direct communication with key stakeholders and partners, including all members of the Advisory Group, to seek their views. The consultation will be publicised more widely through the SCC website, social media, blog, press and other channels, as well as via our partners' channels.

20. Alongside consultation activity, Strand leads will continue to develop more detailed plans for strategy implementation with their working groups. This will,




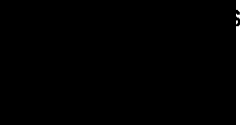

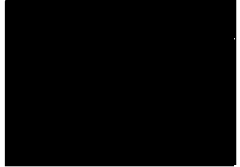
include identification of priority actions, and the necessary resources to facilitate delivery of the vision.



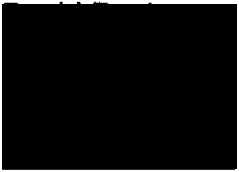
21. The delivery plan summary templates already provided by stand leads provide a broad indicator of how the strategy can be implemented. The illustrative examples from these in **Annex C** are intended to inform discussion at the Advisory Council and the subsequent public consultation. Plans for launching the strategy in December 2016, include publishing a summary table of deliverables and milestones for each work strand. This would then permit Strand Leads until March 2016 to finalise the detail of their respective delivery plans.

Alastair Thomas

Strategy Development Project Manager

National Surveillance Camera Strategy - The Eleven Strands

Strand	Strand Leader	Description – who and why
1. Standards and Certification		There are a plethora of standards, guidance notes and codes that users, installers, designers surveillance cameras/systems can follow. Whilst progress has been made the standards framework is complex. Legal obligations must be followed. This strand seeks to provide a clear road map of standards, assurance and certification which is available for the whole industry.
2. Horizon Scanning		This strand looks at the future technological developments in surveillance cameras and related capabilities. It seeks to inform consideration of whether regulation and guidance is sufficient and thus enable the Commissioner to advise government accordingly.
3. Civil Engagement		This looks at how members of the public are engaged to understand their rights and responsibilities in relation to surveillance cameras and organisations that use them. It seeks to understand how they can be engaged in meaningful discussion and consultation to shape both national development of regulation and local decisions about surveillance of the public.
4. Policing [	Policies forces and other bodies such as the National Crime Agency and PCCs are relevant authorities in the PoFA and must therefore pay due regard to the PoFA Code. They use surveillance cameras and as a recipient of data sharing have key relationships with others who use cameras.
5. Local Authorities		Local authorities (unitary and two-tier) and town and parish councils are relevant authorities under POFA and they must pay due regard to the PoFA Code. They often run numerous independent systems supporting operational policing; protecting communities and helping town/city centres operate smoothly.
6. Voluntary Adopters		This strand looks to organisations operating public space surveillance who are not relevant authorities as set out in POFA S33(5), for example, the retail sector. It seeks to encourage the voluntary adoption of the PoFA Code, so that the public can be reassured about the proportionality and effectiveness of surveillance in priority areas of public places.

Strand	Strand Leader	Description – who and why
7. Critical National Infrastructure	(CPNI)	This strand looks at how surveillance camera systems used to protect critical national infrastructure comply with the POFA Code. It seeks to reassure the public that the systems in these places are proportionate, effective and efficient.
8. Installers and Manufacturers		Organisations operating surveillance camera systems can only do so with the engagement of suppliers - installers, consultants, designers and integrators of surveillance cameras systems as well as manufacturers of devices. These suppliers can fulfil a critical role in good practice, and act as enablers to compliance with the POFA Code by system operators.
9. Training		Trainers and training organisations play a crucial role in ensuring that those using and supplying surveillance camera systems understand the practical and legal requirements. This helps ensure systems are used proportionately, effectively and transparently.
10. Regulation		There are a number of regulatory bodies with responsibilities in relation to surveillance cameras: ICO, SCC, HMIC, OSC, SIA. This can confuse users of surveillance cameras as well as members of the public. This strand seeks to look at opportunities for cooperation between organisations to harmonise regulation and guidance, improve assurance and reduce any regulatory confusion.
11. Information Hub	Surveillance Camera Commissioner	Provision of information through a single digital platform with a strong branding can facilitate effective communication with camera system operators, their partners and the public. A hub could, for example, set out training requirements and list providers. It could signpost to other regulators and help reduce regulatory confusion.

The standards landscape

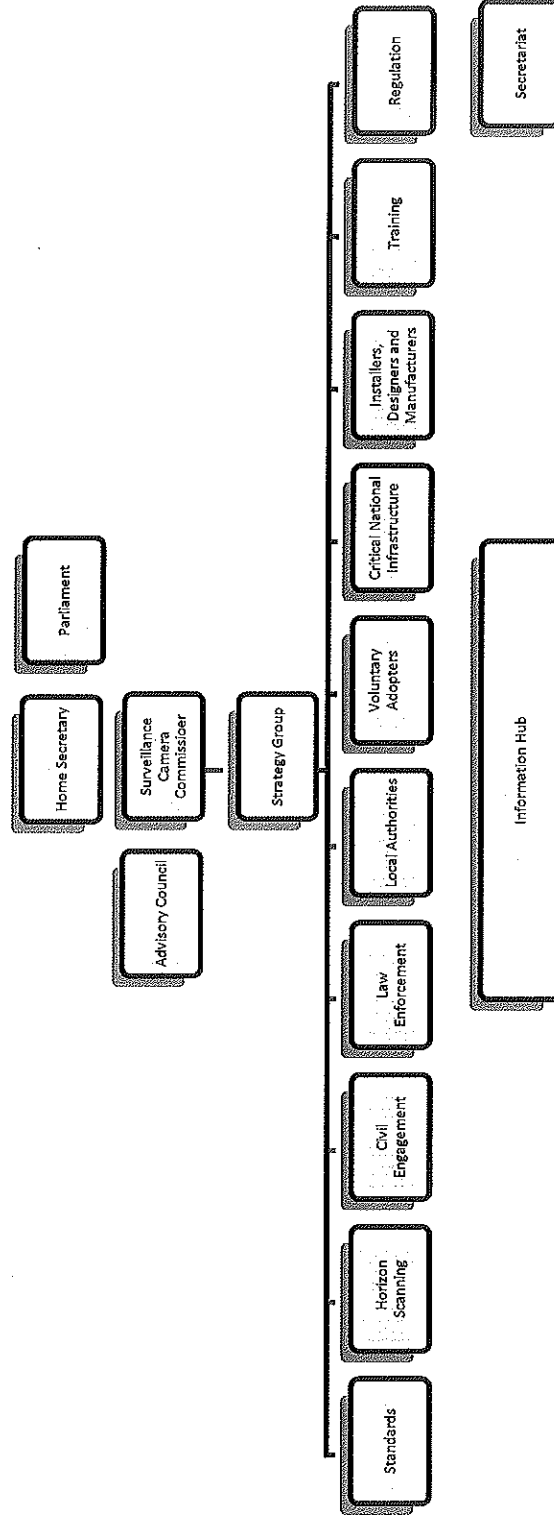
Town and country planning (general permitted development)
Order 1995 Part 33

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



TO BE INCLUDED

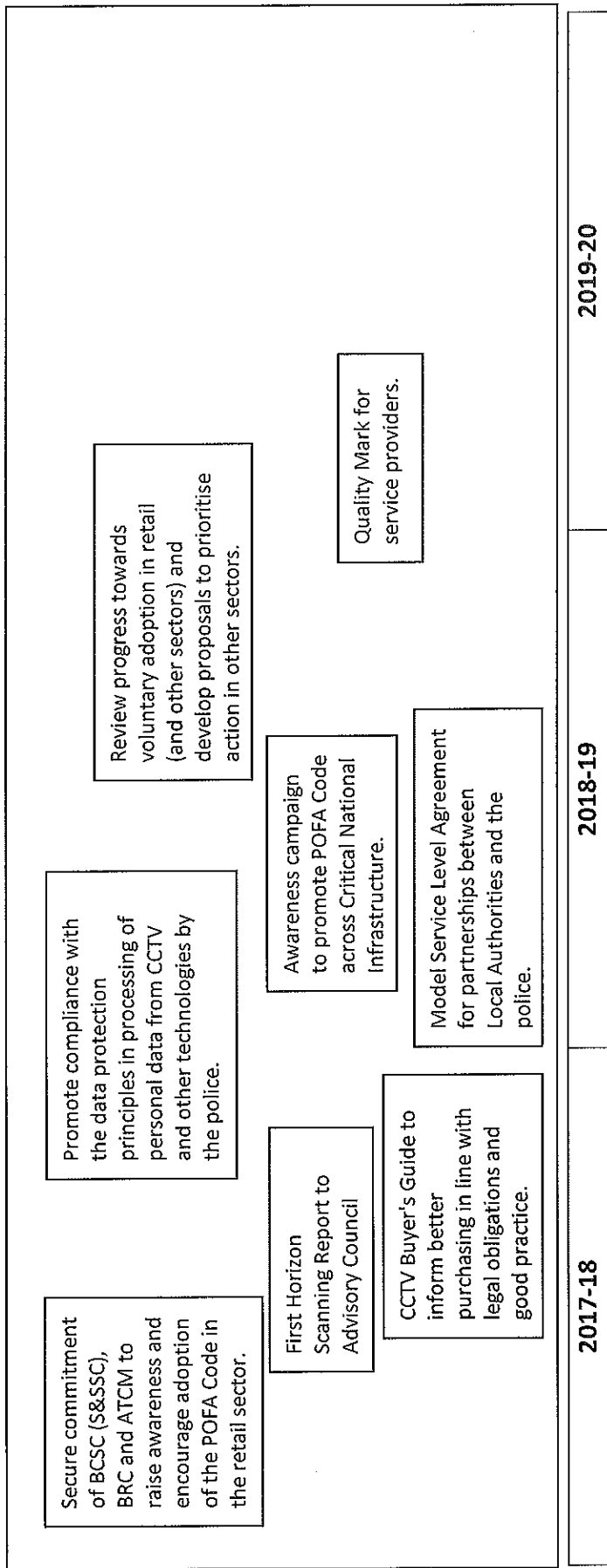
National Surveillance Camera Strategy Governance Structure

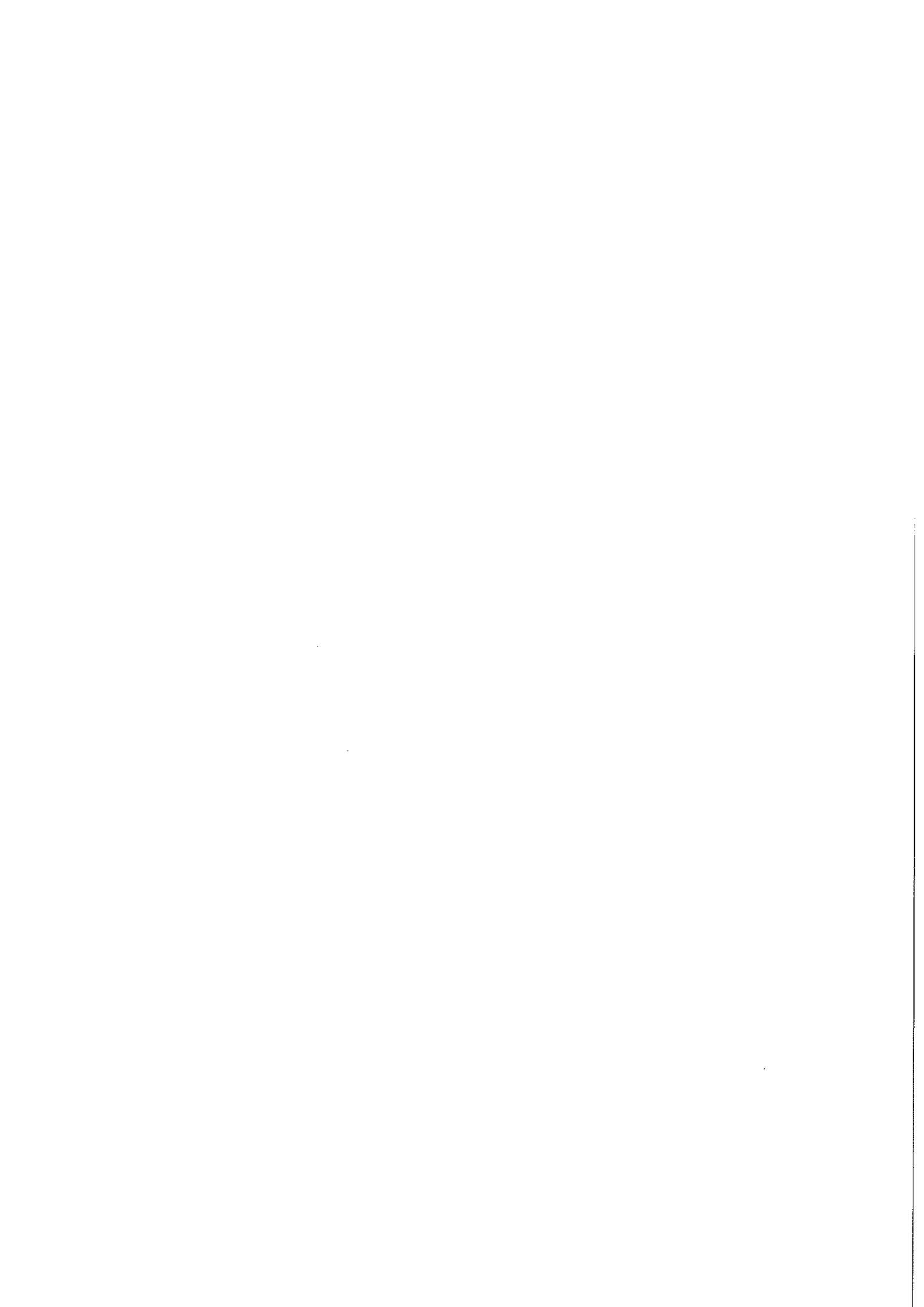


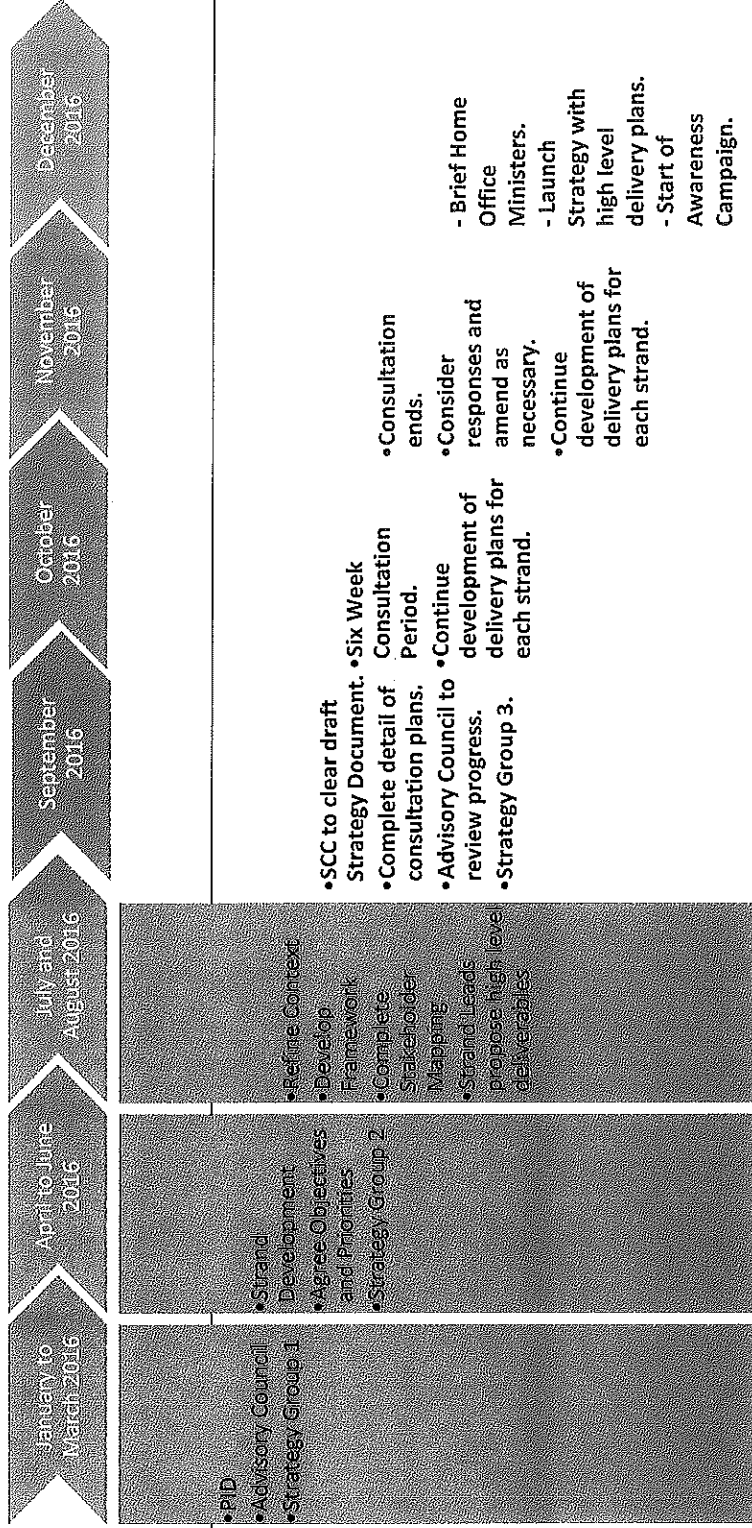
GLOSSARY

To be inserted

NATIONAL SURVEILLANCE CAMERA STRATEGY
 ILLUSTRATIVE EXAMPLES OF DELIVERABLES TO SUPPORT IMPLEMENTATION







ANNEX D

NATIONAL SURVEILLANCE CAMERA STRATEGY DEVELOPMENT PROJECT TIMELINE

