

Appendix A

SUBJECT: CCTV Strategy Review

**Head of Audit Services
21st November 2012**

BACKGROUND

1. A report was presented by the Director of Corporate Resources to the Community Safety & Community Services Scrutiny Committee in November 2011 providing an overview of the Council's CCTV responsibilities, with a particular focus on the role of the CCTV Control Room in Sedgley.
2. Concerns were raised by Members over the number of cameras included at the Report i.e.750 excluding schools.
3. It was recommended that further information surrounding the new amended requirements arising out of the Protection of Freedoms Bill and the findings of the internal CCTV review should be reported to a future Scrutiny Committee meeting.
4. This report examines the findings of the internal review of CCTV together with the latest position regarding the Protection of Freedoms Bill.

FINDINGS

HISTORY

5. In discussions with officers, a number mentioned the impact of a series of incidents [e.g. Dunblane, St Lukes Primary and "7/7"] increasing concerns over security of public buildings and the public fear of crime/terrorism. These all led to an increase in the number of CCTV cameras installed.
6. During research it was noted that a National Police CCTV Strategy was produced in 2007 and a West Midlands CCTV Strategy produced around the same time. We were unable to locate any more recent documents.
7. We have also been unable to find a documented Dudley MBC CCTV Strategy. It appears that a number of locations who have installed CCTV have done so on their own without recourse to a corporate contract, specification, etc. A few have had input from Security Consultants, attached to Corporate Property.
8. It appears that Dudley MBC "strategy" was initially based around the availability of Home Office grants for public scene cameras as part of an initiative to prevent and detect crime. This also resulted in the location of a central control station currently based at Sedgley Police Station to facilitate monitoring and recording of images. The control centre is overseen by a Manager within Corporate Resources who has a range of other duties. For the purposes of this report they will be referred to as the CCTV Manager.
9. A number of the grants were capital one off allocations with no real revenue budget to handle on going maintenance and replacement regimes.

CAMERA NUMBERS AND LOCATIONS

Using the background papers for the Community Safety report from Nov 2011, we have checked on the current numbers of cameras and the numbers appear to have increased slightly. We also asked for details of schools using CCTV and identified 32 sites. The information is summarised below which shows there are over 1100 cameras installed at 130 locations within Dudley Borough.

CCTV Users	Number of Cameras	Number of Locations	Maintenance By / Body Responsible
DACHS	378	56	Baydale
DUE	330	27	Various
DCR	45	7	Various
DCS	8	4	Various
Bus Stations	71	2	Centro
Castle Gate	6	1	Castle Gate
Urban TC	23	1	W'ton UTC
Schools	293	15	Various
Schools		17	Information awaited
Totals	1156	130	

Notes – The cameras involved in Healthy Hubs, UTC and public space have been classified as three locations.

10. The information requested from schools included the split between cameras filming inside buildings and those covering external areas. An assessment was then made of the other locations using CCTV and we estimate the split is approximately 60% internal monitoring and 40% external i.e. close to 700 of the 1120 cameras monitoring internal areas of buildings.
11. It does seem relevant to consider the split between internal and external cameras as the latter could have more implications from a privacy impact assessment perspective if the camera coverage includes private property i.e. houses or land.
12. From enquiries to a few sites it is evident that staffing levels in schools, museums and the like prevent them from having staff roaming spaces to prevent and detect crime or anti social behaviour, or monitor in real time images being filmed. This is one of the reasons for large numbers of cameras at some sites.

PURPOSE OF EQUIPMENT

13. It seems that all security CCTV is organised for the prevention and detection of crime and anti social behaviour. There are some traffic management cameras operating in the Borough to aid traffic management. The report to Scrutiny Committee included the following aims and objectives for CCTV to :-
 - a. Help reduce the fear of crime
 - b. Help deter crime
 - c. Help detect crime and provide evidential material for court proceedings
 - d. Assist in the overall management of the Dudley Borough Town Centre
 - e. Enhance community safety, assist in developing the economic well being to the Dudley Borough area and encourage greater use of the town centres and shopping centres etc
 - f. Assist in traffic management
 - g. Assist in supporting civil proceedings
14. CCTV [and CCTV Control Centres] can also be used for a variety of other purposes e.g.
 - a. Reduce, deter and detect anti social behaviour e.g. fly tipping, bullying incidents in schools
 - b. Assist in making traffic crossings safe for the public and our staff
 - c. Monitor/verify intruder/fire alarm activations and provide a response to the activations
 - d. Provide additional protection for lone workers by physically checking on staff remotely at agreed times
 - e. Handle out of office hours telephone calls
 - f. Integration with Telecare type service
15. One of the most important overall purposes for CCTV is to be a part of a multi disciplinary approach to one of the key objectives of the Council, as laid out in the Council Plan 2013 i.e.

“Community Safety – Dudley Borough where people are safe, and feel safe enjoying a sense of freedom from crime and anti social behaviour.”

PARTNERSHIPS

16. Discussions with various officers and the Partnership Manager from the Police indicated that there are already a number of partnerships in place, some income generating and some revolve around crime reduction and/or traffic management e.g.
 - a. Community Safety & Crime Reduction / Joint Activities Group
 - b. Police
 - c. Dudley Borough Business Crime Partnership
 - d. Urban Traffic Control centres
 - e. Centro – Bus Stations
 - f. Castle Gate Retail Park

It was noted that the Police seem to appreciate the information and help they receive from the Control Centre

17. During the research for this review a copy of the 2002 Dudley MBC & West Midlands Police Code of Practice was found and it provides detail on how the system should be operated but also makes suggestions e.g.
 - a. A copy of the Code of Practice should be published on the web site
 - b. An Annual Report should be published
 - c. Periodic assessment of the CCTV system which should include assessments of the :-
 - i. Impact upon crime, not just areas covered by cameras
 - ii. Incidents monitored by the system
 - iii. Impact on town centre business
 - iv. Areas without cameras
 - v. Views and opinions of the public
 - vi. Operation of the Code of Practice
 - vii. Whether the purposes for which the system was established are still relevant
 - viii. Cost effectiveness

We did not see evidence of all of the above.

18. Logically there are other public bodies in Dudley Borough using CCTV but we made no enquiries on these albeit there could be scope for partnership working with bodies such as colleges, hospitals, etc.

PURCHASE OF EQUIPMENT

19. The 130 sites can be broken down into more discreet groups to reflect operational areas. For example one officer has responsibility for the museum CCTV operations so museums could be considered "one operational location" this impacts on the arrangements for procurement, kit specification, maintenance, etc. The same can be said for the large number of the DACHS Housing sites being managed from Forge House in terms of new installations and maintenance arrangements. The various locations appear to have arranged their own procurement, maintenance, etc. There was limited evidence of a corporate approach to procurement, specifications, maintenance, etc.
20. Each of the schools spoken to seems to be operating on a stand alone basis so they are making their own procurement judgments and carrying out the associated procurement process.
21. The Security Consultancy function within Corporate Property used to have two officers but one left some time ago and has not been replaced due to budgetary constraints. The remaining officer has had some involvement in CCTV and has been involved in some sites to the extent of offering advice or

overseeing specification, procurement, etc and facilitating more standardised arrangements.

22. Enquiries to selected sites representing the majority of non schools locations identified the following :-

Location	Number of Cameras	Annual Maintenance [£]	Repairs & New Equipment 2012/13 [£]
DC+	19	1150	Nil
Public Space & Control Centre	187	17,000	16,000 [budget]
Housing	321	Nil	17,767
Stourbridge Town Hall	16	746	8,375
Museums	128	Nil	3,568
Dudley Leisure Centre	6	653	Nil
Public Car Parks	105	Nil	2,000
Lister Road Depot	12	Nil	2,386

It is difficult to compare the figures as the age and location of each camera differs.

23. Wolverhampton City Council CCTV operations also includes a Control Centre which incorporates Urban Traffic Control [UTC] cameras. They provide a service to Dudley and monitor the 23 traffic cameras located in Dudley Borough.
24. There are also number of smaller CCTV systems for specific stand alone operations e.g.
- a. Community Safety funded body worn cameras and 4 mobile cameras for the Police which are used, monitored, etc, independently of Dudley MBC.
 - b. Traffic Management operate covert cameras installed inside Lollipop signs which are operated by Crossing Staff.
25. The latest offering of CCTV for IT Services Data Centre has been sourced via our own in house Electrical & Mechanical staff with communication links organised by IT Services and camera/system specifications provided by our own Security Consultant. These services were also utilised for the Dudley Council Plus offices.

SEDGLEY CONTROL CENTRE

26. It was noted during discussions that the Sedgley Police Station is no longer a significant operational base for the Police and apart from a Neighbourhood Police Team the site is staffed by volunteers. That level of use may be behind the Police being reluctant to renew a lease for the Control Centre.

27. There is a budget of £17,000 for maintenance of the Control Centre and Public Space cameras. Centro organise maintenance of their own cameras as do Castle Gate. The CCTV Manager also has a small budget of £16,000 to pay for replacement equipment if any needs updating, replacing, etc.
28. The images from the cameras are monitored at the CCTV control room by SIA licensed and suitably qualified staff supplied under contract by OCS Group. There are eight operators in total who work a day shift and a night shift 24 hours a day, seven days a week. There are two supervisors who form part of the team of eight. All activities in connection with the monitoring and sharing information with the Police are carried out in accordance with the Dudley Borough CCTV Operational Procedural Manual.
29. The Control Centre has dedicated performance management data for Centro operations but not all other locations. They have the ability to prepare management information on camera data off their computer system [VTAS] if required.
30. The Control Centre currently monitors images from 187 cameras and these are :-

Location[s]	Cameras	Percentage [%]
Sedgley Control Centre	9	5
Bus Stations	71	38
Town Centres	52	28
DUE Car Parks	8	4
DACHS Housing	13	7
Castle Gate Park	6	3
Healthy Hubs	5	3
UTC	23	12
Totals	187	100

31. A privacy zone check on existing cameras is done on each shift to ensure that any screen blocking areas are maintained. These prevent pan and zoom being used on private residential properties.
32. No operational impact assessments or privacy impact assessments are carried out post installation. The Information Commissioner guidance suggests these should be done at least annually.
33. Linked to Dudley Borough Business Crime Reduction partnership, Control Centre staff operate the base radio station for passing information between shops, security guards and appropriate crime reduction staff to share intelligence about persons committing crime. It was indicated this scheme could be extended to other Town Centres.
34. The provision of images is largely restricted to requests from the Police.

35. Control Room income totalling £157,700 per annum is received for the monitoring of systems. The income received offsets costs of approximately £272,300 per annum.
36. Whilst the Bus Station use emergency "Help" buttons, these are not generally available elsewhere where cameras are used. Research suggests this could be used at designated points for the public to use more generally to summon emergency help and get the attention of the CCTV Operators. Some Councils have introduced a service whereby the public can text the Control Centre to pass on any suspicions about activity in CCTV designated areas.
37. Certain camera images can also be viewed by Police at their Halesowen Control Room. There is also a link with the Emergency Control Centre at Himley Hall.

Wolverhampton City Council CCTV operations also includes a Control Centre which incorporates Urban Traffic Control (UTC) cameras. They provide a service to Dudley and monitor 23 traffic cameras located in Dudley Borough.

GOVERNANCE

38. The Protection of Freedom Bill was enacted in 2012. It includes reference to the appointment of a CCTV Surveillance Commissioner who would be required to produce a code of practice. These actions are still to take place at the time of writing this report.
39. Dudley MBC holds a registration with the Information Commissioners Office [ICO] for all Data Protection issues so we do not need to register each location with the ICO. Schools do however have to register as they are separate entities. The registration is not overly complex and in some cases just involves notifying the ICO so that their general DPA registration recognises the addition of CCTV.
40. Each location using CCTV should complete an Information Governance CCTV Checklist and forward to the Information Governance Team, and resources are being directed to ensuring these are completed.
41. The Dudley MBC web site gives some information on the use of CCTV.

RESOURCES

42. The Authority has a limited central record of all cameras, security systems, etc.
43. We now have one Security Consultant and a CCTV Manager.
44. Funding appears to have historically been found via the Home Office and working within the framework of Community Safety groups such as Crime Reduction, Borough Business Crime Partnership and Joint Activities Group.

45. Funding sources from the Home Office have dried up for any major new installations. The Community Safety Team and their input at Crime Reduction Group have provided funds for some new equipment updates e.g. digitalisation. A wide range of revenue budgets covers the costs incurred by CCTV users albeit some capital schemes may have included security equipment.
46. The major expenditure on CCTV seems to be the costs associated with the Control Centre and associated cameras. Current expenditure on other CCTV operations in non School locations appears to be largely limited to repairing existing equipment and provision of new equipment if monies become available.
47. Finance is an issue as regards any significant requirements for replacement equipment, maintenance. At the present time the CCTV Manager has a small allocation each year for replacement of equipment but no strategic plan for replacement of equipment nor any financing identified for a replacement programme.
48. Part of the CCTV Control Centre costs are met by income generating work for Centro, DUE and DACHS. This could be increased if other options for monitoring were explored such as schools, council alarm systems, CCTV monitored by the private sector, more monitoring of private sector clients systems. Additional services may include key holding and use of CCTV for remote patrolling of sites rather than employing private sector security guards.

CONCLUSIONS

49. There is no formal CCTV strategy covering all locations
50. The current position as regards locations, specifications, maintenance arrangements, etc, has been largely influenced by local managers and suppliers without recourse to corporate specifications or resources.
51. The procurement of equipment, maintenance and monitoring [including alarms] has not been done via a corporate contract.
52. There is scope for a more effective, efficient and economic set up for CCTV in terms of standardised equipment specifications, contracts, maintenance and monitoring. Whilst it is difficult to quantify all costs and income in economic terms, it is envisaged that there is scope for ensuring the CCTV operations are operating at the very least on a break even cost basis.
53. Our in-house security consultant has been involved in providing advice to around 20% of locations.
54. The Sedgley Control Centre operational manual and general operation appears good.

55. The Control Centre may not have a medium to long term future in its current location. There may be a need to locate an alternative site and the Police have indicated they would co-operate in locating suitable premises.
56. There are in house resources within IT Services, Corporate Property and DUE to provide in house solutions to equipment specification, installation and maintenance.
57. The Authority has a large property portfolio which incorporates a significant number of CCTV Systems and alarm installations. There is no significant link up between fire or intruder systems and CCTV.
58. There is limited communication between CCTV users.
59. CCTV has not caused any problems in its current configuration in terms of damaged reputation through abuse of recording images.

RECOMMENDATIONS

60. Dudley MBC should prepare a CCTV Strategy which aims to bring together, and cover, all CCTV operations to consolidate governance, specifications and maintenance with a view to creating a more comprehensive and consistent set of arrangements. The strategy should cover :-
 - a. Objective of systems
 - b. Legislative compliance standards
 - c. Governance requirements and compliance standards as regards Dudley MBC, Home Office, Information Commissioners Office and CCTV Surveillance Commissioner
 - d. Operating procedures requirements
 - e. Communication standards for public interaction
 - f. Partnership working details and requirements in respect of :-
 - i. Police [including their responsibilities and input]
 - ii. Other CCTV users in Dudley MBC [including Schools]
 - iii. Other public bodies using CCTV in the Borough
 - iv. Private sector organisations using CCTV in the Borough
 - v. Crime reduction agencies and organisations
 - vi. CCTV User Group [to be organised]
 - g. Linkage to Corporate Security Strategy and associated activities
 - h. Financial and technical resource plans
 - i. Performance management requirements for large and small systems, and links to other crime statistics
 - j. Operating effectiveness, and privacy, impact assessments
 - k. Business Plan requirements
 - l. Annual Performance Report requirements covering incident reporting, operational effectiveness and privacy impact assessment results
61. An action plan should be prepared to ensure that CCTV sites comply with corporate security requirements regarding the installation, maintenance and monitoring of CCTV and alarms.

The exercise could also link with Corporate Security Strategy requirements whereby each site has to complete a security checklist which helps facilitate the creation of a security plan for each site.

62. The significant property portfolio requires dedicated resources to manage CCTV and security advice & support in a proactive and reactive manner.
63. Various plans should be drawn up to facilitate :-
 - a. Financial e.g. for replacing equipment
 - b. Operational e.g. the location of the Control Centre and cameras
 - c. Technical e.g. equipment specification, technology development monitoring and the capacity of the Control Centre to take on more commercial approaches such as monitoring alarms, key holding and UTC camera communication links and monitoring
64. A test site should be selected to establish the Control Centre for monitoring intruder and fire alarms rather than ADT. This should ideally also include access by the Control Centre to CCTV cameras so they can confirm intruders, fires, anti social behaviour. Should also consider including speakers attached to selected cameras to allow the Control Centre to inform people that they are being recorded and should leave the site before the Police are called.
65. Following on from ground work to establish current systems and, creation of draft CCTV Strategy, a Corporate CCTV User Group should be set up to ensure a corporate approach to CCTV.
66. Develop a better communication strategy with the public [and potential partners] so that information is published on the internet to increase public confidence and knowledge of CCTV systems in the Borough. Additional information would include a code of practice, details of camera locations, an annual report on CCTV operations and effectiveness, etc.
67. Implementing these recommendations will have significant resource implications for Dudley MBC. If the Council does not feel confident in finding sufficient resources to implement the recommendations of this report it may be worth considering outsourcing CCTV. However, there would still be a need to prepare the strategy, plans, specifications, etc, necessary to outsource.

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21st November 2012