



City of Westminster

Westminster CCTV Service Deployment Protocol

May 2024

v1.0 Initial Roll-out

1. Introduction

- 1.1 This protocol relates to tasking and deployment requests that can be raised by Council officers and partners for the use of the Council's redeployable (temporary) wireless CCTV cameras for the purpose of assisting the council in tackling anti-social behaviour, crime, fly-tipping and noise problems that impact Westminster's residential communities.
- 1.2 These cameras are overt in nature and cannot be used inside buildings, on private land, or to capture evidence in a covert manner.
- 1.3 CCTV is an investment in 'situational' crime-prevention. It is designed to change the environment in which crime occurs, rather than trying to change the attitudes and capacities of offenders.
- 1.4 CCTV is used most successfully when the problem at a location is clearly identified and where there is a clear rationale for the installation of CCTV. Furthermore, it is a tool that should be utilised as part of a wider problem-solving approach and a range of interventions.
- 1.5 Temporary cameras are designed to be deployed on a temporary basis. They are not intended to become permanent fixtures and should not be relied upon as a permanent solution to a problem.
- 1.6 They are designed to be deployed for a fixed period, initially for a 12-week period in order to assess the extent of a problem; assist with measuring the number, type, place of incidents; assist with the identification of perpetrators or capture evidence for conviction.
- 1.7 Cameras operated within Westminster Housing stock are currently outside of scope of this document.

2. Resources

- 2.1 There are 100 deployable CCTV cameras that can be deployed across the public realm in the borough.
- 2.2 In addition to this, there are public realm CCTV cameras, both permanent and redeployable, managed and monitored by the Metropolitan Police Service (MPS). The Westminster CCTV service is intended to complement and not replace these existing arrangements.
- 2.3 The deployable units are pan-tilt-zoom cameras (PTZ) capable of remote directional and zoom control. As such they can move 360 degree once installed, however, it should be noted that the lamp column obscures about 90 degrees of the coverage to the rear of the lamp column.
- 2.4 The cameras will link directly into the London Borough of Hammersmith and Fulham's (LBHF) Video Surveillance Service through the use of 4G Sim Cards.

Temporary cameras can be operated from the LBHF Video Surveillance Service (VSS) Control Room by CCTV operators on a 24/7 basis.

- 2.5 These cameras are not monitored continuously by staff, but the cameras are always recording. These recorded images can be downloaded when a request is received following an incident. Recorded images can be passed to enforcement teams in the council and/or police if they are of sufficient clarity to assist with identification and evidence gathering.

3. Deployment

- 3.1 Temporary cameras are installed, maintained and serviced under contract by North. The cost of deployments will be covered by the CCTV service.
- 3.2 In line with the Westminster Way and in order to reduce the impact on pedestrian comfort, where possible existing street furniture of lighting columns should be used for deployment. The lighting column that will be used must be suitable, including tall enough to prevent vandalism to the camera, capable of providing a power supply and to provide a good line of sight. Some heritage columns will not be suitable for use.
- 3.3 Where there is no existing suitable street furniture, consideration will be given to installing an additional column to support the camera. This additional cost and public disbenefit will be balanced with the prioritisation criteria detailed below.
- 3.4 The Highways directorate arrange for a check of the suitability and structural integrity of any lighting column and advise on any electrical components that might need to be added, usually a commando socket.
- 3.5 A shared database will be used to track the installation of a deployable camera following a tasking request being received. This will be used to update the location of any assets on Confirm.
- 3.6 In order to comply with legislative requirements and to maximise deterrent effect, all deployments will be accompanied by a sign, where possible attached to the same lighting column, or nearest suitable highways asset.

4. Tasking and Deployment Process

- 4.1 The Council has long established processes for tackling neighbourhood crime, disorder, waste and noise issues. Local multi-agency partnerships of City Inspectors, local police teams, housing officers both proactively identify problems of concern within a neighbourhood and respond to issues raised to them. This activity is co-ordinated through the Neighbourhood Co-ordinators in the Council's Neighbourhoods Service within Public Protection and Licensing.
- 4.2 The Westminster CCTV Service will utilise these existing processes as much as possible – embedding CCTV as a tool to help local teams deliver outcomes for local residents and businesses.

- 4.3 Within these arrangements, there are established processes for local residents, businesses and ward members to raise ASB, fly-tipping and noise issues for the local partnerships to work to address. Stakeholders should be encouraged to raise problems which need to be addressed, and for which CCTV may be one tool to reach a solution, rather than to specifically request cameras in any given location.
- 4.4 Local ward priorities set in Ward Panels & Neighbourhood Co-Ordinator meetings. The latter also provide an opportunity for ward councillors to influence local priorities, scrutinise the work of local teams and provide challenge if officers do not believe a CCTV will assist with remedying a problem.
- 4.5 If CCTV is considered a suitable tool to assist with a local problem, the Neighbourhood Co-ordinator should work with local partners to complete the CCTV Proposed Deployment Form. On completion, this should be submitted to the Westminster CCTV Lead. The Neighbourhood Co-ordinator will only need to complete a Data Protection Impact Assessment (DPIA) if the request is outside the scope of the approved DPIA.
- 4.6 No deployable cameras should be installed in the borough without the CCTV Proposed Deployment Form being completed. This is to ensure they are installed in line with all relevant legislation.
- 4.7 When completing the deployment form Neighbourhood Co-ordinators should provide as much information as possible. The request should include the following:
- the nature, scale and extent of the problem to be tackled;
 - evidence of the issue or problem to be tackled, this may include CAD reference numbers, number of police callouts, number of complaints (e.g. resident complaints, Councillor enquiries),
 - details of specific locations where incidents are occurring
 - other problem-solving activity being taken, i.e. how CCTV will support a wider problem solving approach;
 - what the desired outcome is, including the output and outcome measures against which that deployment will be assessed.
- 4.8 On receipt, the CCTV Proposed Deployment Form will be assessed by the CCTV against the suitability and prioritisation criteria below. Checks will also be undertaken to ensure that the deployment is legally compliant and technically and operationally achievable. Checks will also be made that ward councillors are aware and are supportive of the deployment. Following this, a decision on the deployment will be taken by the Director of Public Protection & Licensing, in consultation with the Lead Member.
- 4.9 If a request is urgent, an expedited request will be considered by the Head of Community Safety and Specialist Services, in conjunction with the Director of Public Protection and Licensing.
- 4.10 If agreed, it is for the CCTV Lead to co-ordinate deployment through the Council's contractors.

- 4.11 Once approved, a deployment will be for 12 weeks, and this should only be curtailed in exceptional circumstances.
- 4.12 After the camera has been installed for 12 weeks the Neighbourhood Co-ordinator is required to work with the local partnership in order to complete a tasking outcome form. If the local partnership would like the camera to remain installed, they will need to provide justification on the tasking form, including how many times footage from the camera has been viewed, and the effectiveness of the deployment against the output and outcome criteria identified at deployment.
- 4.13 All deployments, outcome forms and risk assessments will be reviewed routinely every 3 months by the Partnership Operations Group. The Group will also determine the length of any continued deployment, up to a maximum of 12 weeks, at which point the deployment will be reviewed again.

5. Monitoring and Tasking Processes

- 5.1 Cameras are not monitored continuously by staff, but the cameras are always recording. If given clear taskings the team will run the camera(s) on the video wall. These taskings need to be in place with the agreement of the LBHF VSS Supervisor.
- 5.2 In accordance with the Data Protection Act, footage is only kept for 28 days from the time of the recording unless it is downloaded.
- 5.3 Footage from the deployable CCTV camera can be viewed by requesting footage from the LBHF Video Surveillance Service control room, specific times and dates will need to be given. Requests can be made to vssinfo@lbhf.gov.uk. Footage will only be downloaded if a specific time frame for the incident is provided.
- 5.4 It is the responsibility of the local partnership team who has requested a deployment to request specific taskings and to report any incidents through to the CCTV Control Room in order for footage to be downloaded. Footage is retained for 28 days and then deleted.
- 5.5 Similarly, local partnership teams should ensure local residents are encouraged to report any incidents, noting as specific a timeframe as possible, so footage can be reviewed.

6. Proposed Deployment form, Data Protection Impact Assessment (DPIA) and Data Protection

- 6.1 The Protection of Freedoms Act 2012 introduced regulation of public space surveillance cameras in England and Wales. As a result, the Surveillance Camera Code of Practice (2013) was issued under s30 of the Act to ensure the use of cameras in public spaces is regulated and only used in pursuit of specified purposes.

- 6.2 The code sets out 12 principles for the operation of surveillance camera systems. Each system should: -
1. Have a defined purpose and legitimate aim
 2. Not impinge on an individual's privacy or human rights
 3. Be operated transparently so people know they are being monitored
 4. Be operated with good governance
 5. Have clear policies, rules and procedures in place
 6. Store no more images/data than strictly required
 7. Have safeguards in place in relation to who can view images/data
 8. Meet relevant and approved standards
 9. Ensure images/data are stored securely
 10. Review systems regularly (at least annually)
 11. Be effective in supporting law enforcement
 12. Databases used for matching purposes should be accurate and up to date
- 6.3 The Neighbourhood Co-ordinator should refer to the approved DPIA in place. Should the deployment request fall outside of this scope, then a new DPIA will need to be completed at the time of request.
- 6.4 The tasking form must be completed before a deployable camera is installed to ensure that the installation is compliant with principles 1 and 2 of the code of practise.
- 6.5 Principle 2 of the Surveillance Camera Code of Practice states that the use of a surveillance camera system must consider its effect on individuals and their privacy. A DPIA was conducted to consider any impact the surveillance system will have on individuals and groups in the society and this impact must be proportional and justifiable. The DPIA also meets the requirement of data protection law.
- 6.6 What the approved DPIA covers as required by law is set out in Article 35 of the UK GDPR (Data Protection Impact Assessment) and Section 64 DPA 2018 (law enforcement processing). The Information Commissioners Office (ICO) has also identified further types of general processing; the approved DPIA is mandatory, because the processing is likely to result in high risks to individuals' rights and freedoms. This can also indicate to controllers who are processing for law enforcement purposes where there may be high risk.
- 6.7 A further benefit of having the approved DPIA is that it helps to address statutory requirements under the Human Rights Act 1998 (HRA). Section 6(1) HRA provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights (ECHR). Therefore, in addition to the above, as a public body or any other body that performs public functions you must make sure that your system complies with HRA requirements.
- 6.8 Should a new DPIA be required at the time of request, it should consider the nature, scope, context and purposes of the surveillance camera activities and their potential to interfere with the rights and freedoms of individuals, as set out in Human Rights law. For example:

- the right to freedom of assembly;
- freedom of thought, belief and religion;
- freedom of expression;
- freedom of association; and
- the protection from discrimination in respect of those rights and freedoms.

6.9 The new DPIA (if required) must be completed prior to the processing in the first instance. If the deployment goes ahead, the DPIA should be reviewed regularly to maintain relevance. Failure to complete a DPIA prior to deployment could result in the ICO taking enforcement action.

6.10 In accordance with the Information Commissioner's Office (ICO) recommendations, including the public's right to privacy, taskings will only be accepted where the level of crime, anti-social behaviour, noise or fly-tipping is deemed significant enough to justify CCTV in the area.

6.11 Access to CCTV footage is restricted to authorized personnel who require access for the purposes outlined in our Privacy Notice, which can be found on our website. Access controls and procedures are in place to ensure that access is granted only to authorized individuals.

6.12 Under data protection laws, individuals have certain rights regarding the personal data processed by our CCTV systems. These include:

- The right to request access to your personal data.
- The right to request correction of any inaccuracies in your personal data.
- The right to request erasure of your personal data under certain circumstances.
- The right to object to the processing of your personal data.

6.13 Queries or concerns around the processing of personal data by our CCTV systems, will be managed through the WCC Information Management Team, dataprotection@westminster.gov.uk

6.14 Operational queries or concerns and requests for footage will be managed through the LBHF VSS, yssinfo@lbhf.gov.uk

7. Deployment and Maintenance

7.1 The deployment, redeployment and maintenance of cameras is undertaken by North, under contract with Westminster City Council. Responsibility of managing that contract lies with the CCTV lead.

7.2 Faults should be escalated to the CCTV lead by the LBHF VSS so that repair work can be instructed.

7.3 North should communicate any delays to the CCTV Lead, for example if traffic management schemes are necessary to install the camera.

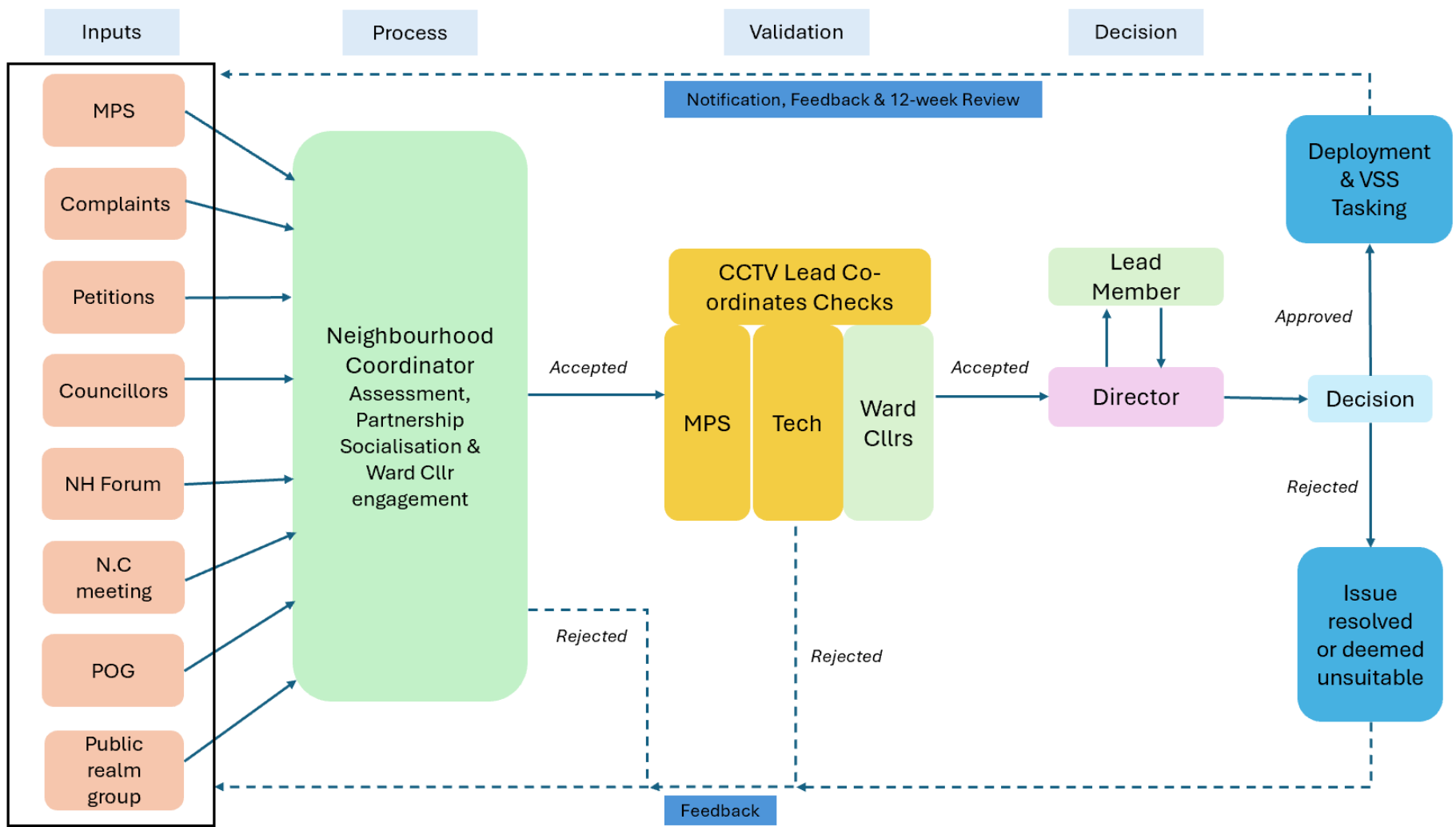
- 7.4 It is essential that the engineers install an advisory sign when a camera is installed. Principle 3 of the Surveillance Code of Practice states that there must be as much transparency in the use of cameras as possible, adequate signage ensures we are compliant with this principle.
- 7.5 Following deployment, the CCTV Lead is responsible for liaising with partners to ensure that software and audit lists are updated with location data.

8. Initial Roll-out and Deployment Process

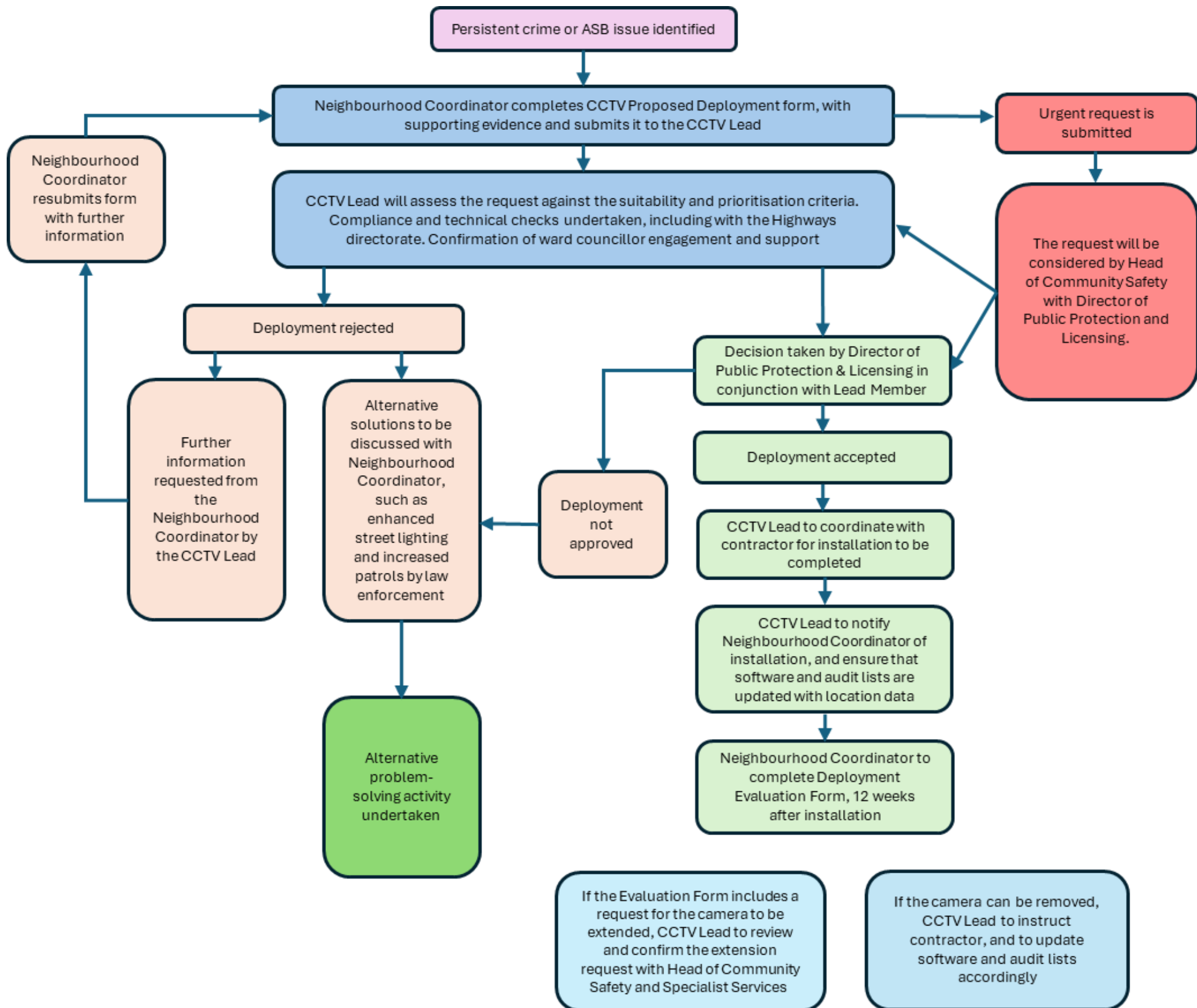
- 8.1 It is recognised that the Council is introducing a new CCTV service and that there will be an iterative process over the first six months of the service in order to review and refine operational processes and the suitability criteria and prioritisation matrix. Alongside this, the operational tasking and neighbourhood crime, ASB and street management processes will need to be reviewed and refined in order to ensure their Service's effective deployment and use.
- 8.2 An initial deployment of a limited number of cameras, to identified and agreed high priority problem locations, with long entrenched crime, ASB or noise issues will be undertaken.
- 8.3 This initial deployment will allow for operational processes, including those for physical deployment, to be established and embedded ahead of a wider roll-out.
- 8.4 During this period, there will also be ward level discussions with ward councillors, through the Neighbourhood Co-ordinator meetings, so that they are engaged and to allow the suitability criteria and prioritisation matrix to be refined based on the identified local 'need'.
- 8.5 The outcome of the review of the suitability criteria and prioritisation matrix will be subject to member scrutiny. The service will also be reviewed by Scrutiny after six months of operation.

9. Process Chart

The overall process flow is detailed below.



A more detailed process flow, linked to the above crime and disorder reduction problem solving process is detailed below.



10. Escalation Policy

- 10.1 The council has a responsibility to our residents and partners to ensure that deployable CCTV cameras can be installed in a timely and efficient manner.
- 10.2 The timescales listed in this policy for each partner should be achievable in most cases if any delays do occur this should be reported to all partners as soon as possible.
- 10.3 The CCTV Lead will monitor the performance of each of these timescales, reporting into the CCTV Governance Group. Where targets are repeatedly missed this will be discussed to understand the reasoning and escalated within the team.
- 10.4 Should timescales not be met the order of escalation should be made in the following order:
- CCTV Lead
 - Head of Community Safety & Specialist Services

11. Suitability Criteria and Prioritisation Framework

- 11.1 In order to manage the resource appropriately tasking requests are considered against the suitability criteria and prioritised according to the prioritisation framework. All deployments have to meet the essential criteria.
- 11.2 All cameras that meet the criteria and are accepted for deployment will be deployed for a 12-week period. Following such period, the camera will be reviewed to either remain in deployment, or to be transferred to another location, based on suitability and prioritisation.

11.3 Essential Criteria

11.3.1 Purpose

- Deployment will assist the Council in tackling anti-social behaviour, crime, fly-tipping and noise problems that impact Westminster's residential communities and form part of a wider problem-solving approach or range of interventions.

11.3.2 Compliance and legal considerations

- Privacy Impact Assessments: Ensuring areas comply with data protection regulations and have conducted necessary impact assessments.
- Legal requirements: Areas where CCTV deployment meets all legal and regulatory requirements.
- The introduction of CCTV is proportionate and justified in relation to the scale of the problem being addressed.

11.4 Suitability Criteria

11.4.1 Crime and disorder rates and types

- High harm crime and disorder areas: Priority to areas with higher harm types of crime and disorder, such as serious violence, Class A drug use/supply.
- High impact crime and disorder areas: Priority to tackle problems which have a high impact on local communities, such as frequency.
- Specific crime types: Focus on areas where the problem aligns to local ward crime and disorder priorities agreed through the Neighbourhood Co-ordinator meetings.

11.4.2 Public safety and perception

- Public concerns: Areas identified by public surveys or reports as feeling unsafe.

11.4.3 Incident history

- Historical data: Areas with a history of repeated incidents or specific concerns raised by law enforcement agencies, Council staff or community members.

11.4.4 Vulnerability

- Residential areas: Especially those with vulnerable populations such as elderly residents or low-income households.
- Business districts: Areas with a high concentration of small or micro businesses that might be prone to theft or vandalism.

11.4.5 Infrastructure

- Existing infrastructure: Places where existing infrastructure can support additional CCTV, making deployment more cost-effective.

11.5 Prioritisation Framework

11.5.1 Urgency of need

- Immediate threat: Areas experiencing a current spike in crime or where incidents have recently occurred.

11.5.2 Impact on community safety

- Locations where CCTV deployment is likely to have a significant positive impact on reducing crime/ASB and increasing public safety.
- Locations where the use of CCTV will: assist with measuring the number, type, place of incidents; assist with the identification of perpetrators OR capture evidence for conviction.
- Community requests: Areas where there is strong community demand and support for CCTV.

11.5.3 Reaching all of our communities

- Locations in wards where there is no or little WCC CCTV.

11.5.4 Cost and feasibility

- Ease of installation: Locations where deployment can be done quickly and efficiently with minimal disruption.

11.5.5 Partnership and collaboration

- Police recommendations: Areas recommended by local neighbourhood teams of police, Council and Housing staff, based on their understanding of local problems.
- Business and community partnerships: Locations where the local neighbourhood teams have collaborated with community partners in a problem-solving approach.

11.6 Should the installation of a camera constitute directed surveillance, the requesting officer will need to consider the requirement for authorisation under the Regulation of Investigatory Powers Act (RIPA). In this situation, the CCTV Lead will discuss this requirement with the officer responsible for the tasking and agree a way forward.

11.7 Tasking forms will be reviewed and prioritised according to the prioritisation framework presented above. Taskings will be assessed against 3 main criteria and graded 1-4 against each (with 1 being the lowest and 4 being the highest).

11.7.1 Harm of crimes and/or incidents of ASB (as appropriate) reported in an area (likelihood). Consideration should be given to the risk of serious violence, Class A drug use/supply, use of firearms or bladed weapons and aggravating factors, such as crimes motivated by hate. Consideration should be given to seasonal variations and size/geography of the area.

11.7.2 Community Impact of crime/incidents on residents or local businesses (consequence), including frequency. Consideration should be given to quantitative evidence (such as recorded ASB, waste reports or noise complaints) and qualitative evidence (such as councillor and community reports, witness statements and resident complaints).

11.7.3 Effectiveness: suitability of location for camera (what view will be achieved, presence of obstructions, other CCTV coverage in area). The likelihood of camera detecting and capturing crime and identifiable footage. On review, the evidence that the deployment has met the outcomes identified in the deployment request.

11.8 It is recognised that elements of the prioritisation scoring framework are subjective and that it should be considered a guide for decision-making and prioritisation. Once approved, deployments should typically be for 12 weeks, and these should only be curtailed in exceptional circumstances.

11.9 In circumstances where all cameras are deployed, the prioritisation scoring framework should be used to consider any new requests against cameras which have been deployed for over 12 weeks, and the associated deployment evaluation form/s.

Example Prioritisation Scoring Framework

Tasking Request	Harm	Community Impact	Effectiveness	Total
Tasking 1	4	3	3	10
Tasking 2	3	4	3	10
Tasking 3	3	3	3	9
Tasking 4	2	2	2	6
Tasking 5	1	1	1	3

Prioritisation Scoring Key

Individual Score		Total Score	
4	Very High	10-12	Very High
3	High	7-9	High
2	Medium	4-6	Medium
1	Low	3	Low

12. Regulation of Investigatory Powers Act (RIPA)

- 12.1 The Regulation of Investigatory Powers Act (RIPA) sets out the authorisation requirements for all covert surveillance carried out by public authorities where that surveillance is likely to result in obtaining private information about a person.
- 12.2 Surveillance is covert if it is carried out and the person that is subject to the surveillance are unaware that it is or may be taking place. Deployable cameras are overt in nature and cannot be used inside buildings, or to capture evidence in a covert manner, so authorisation requirements of RIPA should not be applicable if the cameras are being used as designed.
- 12.3 Where there are concerns that the deployable camera does require RIPA authorisation, the CCTV Lead should discuss it with the Head of Community Safety & Specialist Services in the first instance. This should also be shared with the RIPA authorising lead officer, within Legal Services.
- 12.4 If the MPS wish to use council-owned CCTV, this should be directed to the CCTV Lead, who will query the investigation and ensure that they have the appropriate level of authorisation and to note the parameters of their investigation. The MPS will be responsible for having the appropriate authorisations in place. Any such application should be escalated to the Council's RIPA lead within Legal Services for review and for entry on to the Council's RIPA database.

Appendices

- 1. CCTV Proposed Deployment Form**
- 2. CCTV Deployment Evaluation Form**



**Westminster City Council
CCTV Proposed Deployment form**

Aim: To assist the council in tackling anti-social behaviour, crime, fly-tipping and noise problems that impact Westminster’s residential communities.

All deployments must

- Address a problem that relates to the above aim
- Assist with measuring the number, type, place of incidents; assist with the identification of perpetrators OR capture evidence for conviction.
- Be part of a wider problem solving approach or range of other interventions.
- Be compliant with data protection and all other legislation

Title	
Location	
Ward	
Neighbourhood Co-ordinator	
Problem <i>Please provide details of the nature, scale and extent of the problem. This should include consideration of both the harm caused and the community impact. These may be:</i> <i>Quantitative – eg recorded ASB/crime, noise complaints, dumping reports</i> <i>Qualitative – eg member/community reports, witness statements, resident complaints</i> Please be as detailed and specific as possible.	
Purpose of the Use of CCTV <i>Please provide details of how the CCTV will assist with measuring the number, type, place of incidents; assist with the identification of perpetrators OR capture evidence for conviction.</i>	
Proposed Deployment	
Number of cameras required	
Specific Locations – Please provide exact details, including column or asset numbers	

Problem Solving Approach

Please provide details of how the other local partnership activity that will be undertaken alongside the deployment in order to reduce or eliminate the problem or its impact.

Evaluation

Please detail the output and outcome measures against which the effectiveness of the CCTV deployment and associated problem solving activity will be assessed.

Please send the completed form to the WCC CCTV Lead



**Westminster City Council
CCTV Deployment Evaluation Form**

City of Westminster

Title	
Location	
Ward	
Neighbourhood Co-ordinator	
Length of deployment <i>Include specific dates</i>	
Reason for initial deployment <i>Specific issues the camera was deployed to address</i>	
Evaluation <i>Please include how many times footage has been viewed, and effectiveness against the outcome criteria identified at deployment</i>	
Request for extension of deployment	YES/NO Delete as applicable
Reason for extension <i>Please include any further criteria identified (if any) to be measured, and length of extension requested, along with any supporting evidence</i>	