CLOSED CIRCUIT TELEVISION SYSTEM

ANNUAL REPORT 2012/13



CCTV Control Room

CCTV Annual Monitoring Report 2012/13

1 Introduction

Tonbridge and Malling Borough Council has been operating a CCTV system since 1995. In 1998 we commissioned the joint (with Tunbridge Wells Borough Council) CCTV Control Room and commenced live, 24 hours a day, monitoring of the town centre CCTV systems for the two boroughs.

CCTV is an important tool when used to assist law enforcement agencies. It provides public reassurance, a deterrent to offenders, and valuable evidence linking perpetrators of crime to a specific location and time.

2 Objectives

The objectives of the joint system which form the lawful basis for the processing of data are:

- To help reduce the fear of crime
- To help deter crime
- To help detect crime and provide evidential material for court proceedings
- To provide assistance in the overall management of public health and safety
- To enhance community safety, assist in developing the economic well being of Tunbridge Wells and Tonbridge & Malling Boroughs and to encourage greater use of the Town Centres, shopping areas, car parks and similar locations within the two Boroughs
- To assist the Local Authorities in their enforcement and regulatory functions within the Boroughs of Tunbridge Wells and Tonbridge & Malling
- To assist in Traffic Management

3 Context

We started off CCTV as a standalone, mainly car park, security tool. Since opening the CCTV Control Room we have continued to develop the system to cover further locations across the borough in response to changing crime patterns and direction from the Community Safety Partnership.

The Community Safety Partnership was set up to make the Borough an even safer place for residents, visitors and businesses. It consists of the staff from various services from the Borough Council, Kent County Council, the Police and other relevant agencies.

We now provide comprehensive CCTV systems in the public areas and car parks in central Tonbridge, Snodland and West Malling. We also provide

CCTV Annual Monitoring Report 2012/13

coverage in the Blue Bell Hill commuter car park, the public car parks in Aylesford and at a number of recreational areas in Tonbridge. In each of these areas the lighting has been improved where necessary and signs provided to make it clear to the public that they are in an area monitored by our CCTV systems.

CCTV provides a stable deterrent to those intending to commit crime and helps to reduce the fear of crime for residents. In a previous survey by the Community Safety Partnership, 95% of residents stated that they felt safe when walking alone at night and some credit must surely come from the pro-active effective monitoring of public areas with CCTV, particularly within the town centres. Of course in addition to this the CCTV operators provide professional support and assistance to the Police when they are dealing with live incidents.

The use of CCTV cameras across the Borough is in line with the Council's key corporate priorities in so far as the CCTV operators and cameras assist and promote 'Low levels of crime, anti-social behaviour and the fear of crime' (TMBC Key Priorities 2012/15)

4 System description (Tonbridge & Malling only)

The current CCTV system consists of 154 cameras primarily linked by fibreoptic cable to the central joint CCTV Control Room in Tunbridge Wells. The locations of the cameras are as follows.

Tonbridge High Street, car parks and surrounding areas – 49 cameras Snodland High Street area and car park – 11 cameras Aylesford car parks – 13 cameras
West Malling High Street and car parks – 22 cameras
Blue Bell Hill car park – 6 cameras
Kings Hill Council Offices – 27
Castle Offices – 19

Mobile cameras – 7 cameras

All the images from these cameras are recorded 24 hours a day, 7 days a week on to high quality digital storage system.

5 Systems controlling principles

There are two key documents that set out both the operational guidance and general principles.

The Code of Practice sets out the objectives of the CCTV system along with the guiding principles in its operation especially considering the key pieces of

CCTV Annual Monitoring Report 2012/13

legislation that impact upon its operation. The Code of Practice can be viewed on the TMBC website.

The Procedural Manual translates the Code of Practice into practical day-to-day operational practice and we have it as a working document to give guidance to operators. They use it as a reference document and it is also a manual for new operators. The Procedural Manual is kept in the Control Room.

6 Communications - Airwave/Shopwatch/Pubwatch

The CCTV Control Room also acts as a key information hub. The CCTV Operators have the ability to talk directly with local police officers and the Kent Police centralised Force Control Room (FCC) via the police 'Airwave' radio system.

The Tonbridge town centre 'Shopwatch' and 'Pubwatch' radio schemes are operating well and allow shop keepers and publicans to talk via radio links to the operators in the CCTV Control Room and the town centre police officers. Retailers and publicans benefit by receiving a dedicated and visible crime/ASB deterrent with enhanced links and a greater working partnership with CCTV Control Room and the local police. Staff in the shops and pubs have been police trained bringing with it extra skills in dealing with customers and criminals. These radio links allow vital current information to be relayed directly to the CCTV Operators which in turn allows us to monitor via nearby cameras and alert the police to current and emerging problems.

7 CCTV Monitoring contract - Staffing review

The control room is manned with 2 operators 24 hours a day 365 days a year. Tunbridge Wells Borough Council is responsible for providing the CCTV Operators and currently achieves this through a 2 year contract that ends in April 2013.Remploy Ltd. currently undertake this service and are one of the UK's leading providers of employment services to people with disabilities and complex barriers to work.

8 Maintenance contract - review

To keep the system functioning efficiently, we carry out routine maintenance and repairs as necessary. This is currently undertaken by Chroma Vision Ltd., a company which specialises in CCTV systems and provides a 24 hour call out service as required.

9 CCTV Performance Evaluation

These statistics are taken from data held within the CCTV Control Room and provide a simple and clear indication as to the types and numbers of incidents dealt with throughout the year (Annex A).

Some important statistics to note are that during the 20012/13 year the CCTV Control Room responded to 311 requests from the Police for assistance, 392 incidents identified by Shopsafe and Pubwatch and pro-actively identified a further 186 incidents, resulting in 269 known arrests. Over the year the control room has monitored and recorded a total of 889 incidents in the Borough.

The CCTV operational analysis provides a detailed review of the type of incidents monitored. In addition to this there is a substantial amount of routine monitoring to pick up things such as ongoing concerns relating to the inappropriate evening use of car parks, particularly in Tonbridge, by some motorists.

10 Targeted Operations

The CCTV system is operated in accordance with the principals and requirements of the Human Rights Act 1998 but inevitably there may on occasions be a need for 'directed' (targeted) surveillance. Authorisations can be made in accordance with the Regulation of Investigatory Powers Act (RIPA) 2000 subject to the authorisation of a senior Police officer or a senior Borough Council officer. Between April 2012 and March 2013 we have had 2 TMBC RIPA authorisations.

11 Mobile Cameras

The mobile cameras are CCTV cameras that can be fitted to existing street lighting columns predominantly in locations where there are hot-spots of antisocial behaviour (ASB) or other concerns. These cameras are a vital tool and can easily moved to another location at the direction of the Community Safety Partnership to assist with issues of immediate concern but which are unlikely to need a permanent camera positioned. They are versatile in tackling ASB as they can be installed in almost any location where there are street lights. These cameras would normally be deployed for any period between 2 weeks and 6 months, depending on local need and competing concerns elsewhere in the borough. Between April 2012 and March 2013 we have pro-actively operated 7 mobile CCTV cameras.

12 Complaints

No complaints were received about the CCTV service between April 2012 and March 2013.

13 Independent Audit

An independent audit was carried out by Mrs Dianne Hopper in February 2013 to assess compliance with the Council's CCTV Code of Practice. (Mrs Hopper recently retired from Dover District Council where she held the role of CCTV manager for many years. She has extensive experience in carrying out audits on various CCTV systems and since her retirement has been undertaking independent audits of CCTV systems across Kent.)

The report also evaluated the CCTV system and found it to be running efficiently with cameras and equipment working to a very good standard. This report raised no areas of concern in relation to our systems. (Annex B).

Annex A
Control Room Statistics — carried out by the operational contractor

	Apr- 12	May- 12	Jun- 12		Jul- 12	Aug- 12	Sep-12		Oct- 12	Nov-12	Dec- 12		Jan- 13	Feb-13	Mar- 13	Total
CCTV Instigated Incidents	25	20	13		5	17	16		13	14	17		18	19	9	186
WKP Instigated Incidents	30	30	33		22	25	26		23	26	24		20	24	28	311
Shopsafe Instigated Incidents	26	30	24	_	19	26	23	-	28	23	29	-	32	32	39	331
Pubwatch Instigated Incidents	6	6	8	_	2	9	5		6	5	6	_	2	4	2	61
Total Incidents Monitored	87	86	78		48	77	70		70	68	76		72	79	78	889
Police Attended incidents	72	59	54	_	29	53	47		42	35	54	_	47	59	43	594
PND's	0	3	1		1	2	1		0	0	2		2	3	1	16
Known Arrests	35	13	23		11	25	13		13	25	25		34	24	28	269
Tape Reviews	20	43	35	_	23	33	18	-	21	17	25	_	17	14	26	292
Number of Tapes Seized	4	11	3		3	6	7		9	0	0		0	0	0	43
Number of R/T Discs Seized	13	15	5		12	15	6		15	12	24		20	9	13	159
Complaints Received	0	0	0	_	0	0	0	_	0	0	0		0	0	0	0
Written Thanks/Commendations	0	0	0		0	0	0		0	0	0		1	2	0	3

Notes

- These figures are lower than the total incidents monitored, however not every incident recorded requires police attendance. The Police response will depend on the availability of officers on duty, however the live images are sent to the Kent Force Communications Centre to enable them to actively monitor and prioritise their response.
- These arrests have been made with the assistance of the CCTV Operators.

CCTV Operational Analysis – carried out by the operational contractor

Annex A

Incidents/Offences Monitored	Apr- 12	May- 12	Jun- 12		Jul- 12	Aug- 12	Sep-12		Oct- 12	Nov-12	Dec- 12	Jai 13		Feb-13	Mar- 13	Total
Alarms	1	1	1		0	0	0		0	0	0		0	0	1	4
Alcohol Related	5	4	6		4	8	2	_	2	1	4		6	8	2	52
Assault	3	5	4		4	7	4		3	6	4		2	3	2	47
Break in/Attempted Break In	2	0	2		1	1	0		0	1	0		0	0	0	7
Burglary/Attempted Burglary	0	0	0		0	0	0		1	2	0		0	1	0	4
Criminal Damage	4	1	3		0	2	2		7	5	3		1	1	3	32
Drug Related	4	1	2	_	0	3	0		0	1	2		3	3	0	19
Fraud/Deception/Scam	3	4	0		0	0	0		3	2	2		1	3	1	19
Misper/Concern for Welfare	6	14	11		6	8	14		2	7	10		6	5	7	96
Nuisance Youths	0	2	4		0	1	3		2	1	2		1	3	1	20
Offensive Weapons	0	2	0		2	1	0		1	1	0		0	0	0	7
Other - Requests to monitor	5	5	5		5	5	5		7	4	2		5	8	7	63
Public Order	20	25	15	_	5	12	14		11	5	11		13	4	10	145
Racial Incidents	0	0	0		0	0	0		0	0	0		0	0	0	0
Theft - From Persons	1	5	2		0	0	0		3	2	1		1	1	2	18
Theft - Other	5	1	3		0	2	2		1	4	7		2	8	2	37
Theft - From Shop	15	13	14		17	20	17		20	17	20		21	19	32	225
Vehicle Incident/Traffic Violation	10	3	6		4	7	5		6	7	6		9	8	8	79
Wanted Persons	3	0	0		0	0	2	-	1	2	2		1	4	0	15
Total Incidents Monitored	87	86	78		48	77	70		70	68	76		72	79	78	889

CCTV Audit

Dianne Hopper 40 The Grove, Deal, Kent CT14 9TL dijimhopper@aol.com 01304 381224 07811 474488

February 2013

AUDIT REPORT
CLOSED CIRCUIT TELEVISION (CCTV)
TUNBRIDGE WELLS BOROUGH COUNCIL
TONBRIDGE AND MALLING BOROUGH COUNCIL

Audit Report Closed Circuit Television (CCTV)

TUNBRIDGE WELLS BOROUGH COUNCIL AND TONBRIDGE AND MALLING BOROUGH COUNCIL

1 <u>Terms of Reference</u>

1.1 Full Systems review denoting all procedures and operational protocols to ensure compliance with current legislation, Procedure Manual and Code of Practice.

2 Scope

- 2.1 Review Procedure Manual and Code of Practice to ensure they are accurate and up to date.
- 2.2 Undertake testing to ensure compliance with Procedure Manual and Code of Practice.
- 2.3 Review procedure and test compliance with Subject Access Request under the Data Protection Act 1998 (DPA)
- 2.4 Review procedure and test compliance for applications under the Regulation of Investigatory Powers Act 2000(RIPA)

3 Introduction

- 3.1 Tunbridge Wells Borough Council and Tonbridge and Malling Borough Council have implemented a CCTV system into the towns of Tunbridge Wells, Knight's Park, North Farm, Paddock Wood, Southborough, Rusthall, Cranbrook, Lamberhurst, Hawkshurst, Pembury, Tonbridge, West Malling and Bluebell Hill. The system is jointly owned and managed by both Councils, who work in partnership in the interests of economies of scale and cost effectiveness.
- 3.2 The provision of CCTV monitoring is a non-statutory function. Although the original system, which was installed in 1997, was part funded by Government grants, there is no funding available for the on-going maintenance and provision of the CCTV Service, and this expenditure is completely met by the two Authorities.
- 3.3 The system comprises of a mixture of 104 fixed, pan tilt and zoom cameras that are strategically placed primarily in town centres and car parks. 67 of these cameras are monitored on behalf of Tonbridge & Malling Borough Council, and 37 on behalf of Tunbridge Wells Borough Council. Transportable or mobile cameras may also be temporarily sited where there is a requirement, and these cameras are governed by the same Code of Practice and Procedure Manual as the fixed system. All images can be relayed to Kent Police Head Quarters at Maidstone. There are no recording facilities at any location other than the CCTV Control Room situated in Tunbridge Wells Borough Council's Town Hall. A second review suite is located at Tonbridge & Malling Borough Council's offices at King's Hill.

Live data feeds from the Kent Police Control Centre from the Tunbridge Wells CCTV Control Room are available in Police vehicles and various Police Stations.

- 3.4 The main objectives of the scheme are those of crime prevention and detection, community safety, traffic management and the enforcement of regulatory functions.
- 3.5 The Partnership has produced a statement that is available within the Code of Practice, and can be accessed via www.tmbc.gov.uk
- 3.6 The CCTV Control Room has access to the Police "Airwaves" radio system, and, in association with Tonbridge and Malling Community Safety Partnership and the Tunbridge Wells Safe Town Partnership, uses the radio links with the local Shopwatch and Pubwatch Schemes.
- 3.7 The CCTV service is represented at daily tasking meetings with the Community Safety Unit in order to share information and harmonise partnership working.

- 3.8 The CCTV installation contains an integral clock, which ensures that the correct date and time are always displayed correctly. In addition to this, the operators test the system against the speaking clock on a daily basis, to ensure continuity within the system.
- 3.9 The scheme is managed effectively and efficiently by a Partnership CCTV Manager, who is responsible for the Control Rooms at both Tunbridge Wells and Sevenoaks. A recent Mid Kent Audit found that the Control Rooms had effective controls in place, and the Assurance level was rated as substantial. The innovative use of a professional CCTV Manager taking responsibility for multiple sites and installations appears to work extremely effectively. This partnership proves to be financially advantageous to both Councils at a time when savings must be demonstrated.
- 3.10 The Control Room is in the final stages of a CCTV upgrade. Both Councils appointed an independent consultant to undertake a feasibility study comprising of various options that would be beneficial financially and operationally for both. This included a review of the current CCTV hardware that comprises the Tonbridge & Malling Borough Council and Tunbridge Wells Borough Council's CCTV systems, and a review of the implications and costs for the following options:
 - An upgrade of the existing CCTV system, monitoring, control and recording of cameras, based on the CCTV Control Room remaining at its current site at the TWBC's Town Hall. With this option the possibility that there may be a requirement to move the equipment at a later date to a new Control Room location, if for example the Town Hall was to closed or be sold.
 - An upgrade of the CCTV system based on the cameras being monitored controlled and recorded by another Local Authority from another location, either as a client/customer or as a partner.
 - The option to do nothing
 - The option to close the CCTV system.

The recommendation was to upgrade the existing control room, and this is now in the final stages of implementation.

- 3.11 Staff Monitoring is contracted out to Remploy. This contract comes to an end on 31March 2013, and OCS Legion will take over the monitoring contract from 1 April 2013.
- 3.12 A schedule of the testing undertaken and subsequent results is contained within this report.

4. Observations

- 4.1 Procedure Manual and Code of Practice
- 4.1.1 A comprehensive procedure manual and code of practice exist for the provision of the service, which has been formally agreed and entered into by TMBC, TWBC and Kent Police. These documents reflect current responsibilities, and are up to date.

4.2 Compliance Testing

4.2.1 Testing was undertaken to ensure compliance with the Procedure Manual and associated Code of Practice. A schedule of the tests is contained within this report, and details the testing undertaken, cross referenced to the Procedure Manual and/or Code of Practice, the objective of the testing and the results.

4.2.2 Visitors

Access to the Control Room is strictly controlled to ensure that the confidentiality of information is maintained. All visitors are required to sign a Visitors Book, and in doing so confirm a declaration of confidentiality.

4.2.3 Operational/Shift Event Log

Operators are responsible for recording all activities and events while operating the system in the Operational/Shift Event Log.

4.3 Data Protection Act

- 4.3.1 Compliance with the Data Protection Act 1998 (DPA) is fundamental to the Service, which collects and records significant amounts of personal data. An assessment of this compliance was undertaken as part of the audit review.
- 4.3.2 The scheme forms part of the Council's data protection notification to the Information Commissioner. Section 163 of the Criminal Justice and Public Order Act 1994 creates powers for Local Authorities to provide Closed Circuit Television coverage of any land within their area for the purpose of crime prevention or victim welfare thus providing a lawful process for the collection of CCTV images.

4.3.3 Subject Access requirements

Under the DPA, individuals have a right of subject access to information held about them.

Six Subject Access Requests were received between January and December 2012. Documentation relating to these requests were inspected and found to comply under the Act.

4.3.4 Signage

Four sample sites were inspected at random to ensure that adequate and appropriate signage was displayed in compliance with the fair processing requirement of the DPA 1998.

All sites visited displayed correct and adequate signage.

5 Regulation of Investigatory Powers Act

- 5.1 The Regulation of Investigatory Powers Act (RIPA) enables Public Authorities and Police to undertake covert surveillance under certain conditions without breaching individual's rights under Article 8 of the Human Rights Act 1998.
- 5.2 The use of the CCTV system by the Councils and third parties, namely the Police, for directed surveillance would require an authorised application under RIPA for the information to be obtained lawfully. Directed surveillance, through the use of CCTV has not been undertaken between January 2012 and December 2012. An annual reporting mechanism to the Information Commissioner is in place via the Internal Audit Section. The Assistant Information Commissioner undertook an inspection of the CCTV Operation on 18th October 2012, had no cause for concern and was in full praise of the Control Rooms operations.

6 Performance Monitoring

- 6.1 The operation undertakes performance monitoring using a comprehensive set of benchmarks on a monthly basis. The information resulting from these records forms the basis of an Annual Report. It would be good practice to publish this report on the Council websites, to encourage public confidence in the system.
- 6.2 Staff are currently being trained on a new automated system to record incidents. When commissioned, this system will greatly enhance the reporting and control mechanisms.

7 Maintenance Contract

7.1 The maintenance contract is put out to tender on a regular basis, and includes all parts and labour. The current Contractor provides a satisfactory service and gives no cause for concern.

8.Testing

Schedule of Tests- Procedure Manual and Code of Practice

Test	Objective	Result
Check random footage to	To ensure that	A review of recordings was
ensure the Operators do not:	restricted activities	undertaken to ensure all
-Attempt to look into rooms	are not undertaken by	incidents, including monitoring
of a property or in	Operators during	that picked up more than 50% of
particular living areas	monitoring	a person's anatomy or features
-Attempt to look into gardens		was recorded as such that all
of residential premises		other monitoring was considered
without due cause		routine.
- Attempt to gain a close up		The testing covered the time
of a person's anatomy		period between 3am and 5am
- Monitor, and therefore		on 27th January 2013, for
record, the activities of		camera numbers 512 and 506.
courting couples		The footage reviewed did not
Campile also also associate for	To ensure that the	include any restricted activities
Sample check requests for	authorisation of the	Reviewed as part of a main
information by the Police	Police Supervisory	sample testing. All documentation inspected
	Officer including their	complied with the Code of
	name and warrant	Practice.
	number along with	Traduce.
	the details of the	
	recipient of the	
	information are	
	recorded in the	
	appropriate log	
Review Visitor Books and	To ensure that	Reviewed as part of the main
Security Log. Test that each	access to the Control	sample testing. A general review
entry contains name,	Room is secure	of the documentation showed
company, date, time of		that entries are comprehensive.
arrival and departure,		
authorisation and reason for		
visit. Test that the book		
includes a declaration of		
confidentiality.		

D :	l -	D !: 1 16 04 1
Review records management procedures. Determine how	To ensure that records are not	Recordings are kept for 31 days before being automatically
retention Policy is managed.	retained longer than necessary in	overwritten. Paperwork is destroyed on a regular basis as
	accordance with the	and when file space is needed.
	Data Protection Act.	·
Inspect SIA registrations	To comply with	This documentation was
	current legislation	inspected and found to be
	regarding contracted-	compliant. A register is held by
	out operations.	the CCTV Manager to ensure all certificates are current. The
		CCTV Manger is at present an
		SIA authorised mentor. This
		gives her direct access to check
Test	Objective	on any SIA licence. Result
	To ensure	A random sample of an incident
Incident Log	compliance with Procedure Manual	was reviewed to ensure that the
Select a random sample of incidents and check that the	Procedure Manual	necessary entries were made in the log book.
following are recorded in the		The results of this testing were
Incident Log		satisfactory, and it was noted
- Serial number		that the Operator used the
- Time, date and		camera to its full advantage. All
operator completing the entry		images demonstrated clarity.
- Consecutive serial		
number for the		
incident - Camera ID		
- Incident type		
- Police notified time		
- Incident originated by		
Police report numberDescription of incident		
- Location of incident		
- Police arrest?		
- View images of these		
incidents to ensure accuracy of log entry		
Media Management Log	To ensure	All paperwork inspected
Review the operation of the	compliance with the	complied with the Code of
media management log to	Procedure Manual	Practice and the Procedure
ensure that the use and		Manual. Paperwork is also
whereabouts of all media is		currently being updated to
recorded from delivery to the monitoring room to disposal,		include the use of digital recordings.
where applicable		recordings.
oro applicable		

To ensure appropriate authority exists to review images	In each case, the viewing log had been correctly completed
To ensure legislative	Directed surveillance was not
compliance is met	requested during 2012.
Objective	DIt
	Result
	Four signs were inspected at random, and complied with
	current legislation.
10 11100	canoni logicianom
To ensure that	Subject access requests were
legislative compliance	examined and found to comply
is met	in each case.
	appropriate authority exists to review images To ensure legislative compliance is met Objective To ensure that legislative compliance is met To ensure that legislative compliance is met

Chift/Operational Log	To onouro	Logo reviewed for 7th and 9th
Shift/Operational Log Sample test that the	To ensure	Logs reviewed for 7 th and 8 th
'	compliance with	February 2013 and were found
following details are recorded	Procedure Manual	to comply in all cases
in the Log:		
- Serial number for		
entry		
- Time/date and		
Operator completing		
entry - Camera ID where		
applicable		
Check that, where		
applicable, log contains:		
- Operator booking		
on/off		
- Periods away from the		
room		
 Visitors to the room 		
including reason and		
duration		
- System faults		
- Operator		
instructions/requests		
- Handover notes at		
shift changes		
Inspect Police vetting	To comply with the	All certificates were current, and
forms for all persons	Code of Practice	automatic renewal is undertaken
employed in the		by Kent Police
CCTV Operation		by None i oneo
COTT Operation		
Test	Objective	Result
Ensure that Operators check	To ensure	Procedures verified as correct.
at the change of shift that :	compliance with the	and documented in log. The
- All cameras are	Procedure Manual	speaking clock is contacted on a
operating correctly	1 Toccaute Mariaar	weekly basis to ensure correct
and providing usable		times are being automatically
images		shown.
- Time control system is		GIIOWII.
operating correctly		
Evidence that specific key	To comply with the	The CSU and the police in
objectives are reviewed and	Code of Practice	partnership are currently looking
published		at this year's priorities. Key
		objectives are set based on
		crime data in the Districts on an
		annual basis. This year will
		include violence (including NTE

and Domestic), acquisitive crime
of all varieties, and Anti-Social
Behaviour. These priorities are
then entered into the
Partnership Plan, which is
available on the Councils'
websites.

9 Audit Summary

9.1The overall operation of the service is good, with highly professional Operators complying with the Code of Practice and Procedural Manual as made out.

10 Recommendations

- 10.1There is currently no requirement under the Code of Practice to provide for a Lay Visitor Scheme. It is recognised that recruiting for this role is difficult, not least of all because there is no tangible reward. However, it is also recognised as good practice to demonstrate that an "outsider" has the ability to monitor the images recorded by the CCTV Operation. It may be prudent to nominate the Portfolio Holder to this role, which will demonstrate transparency and further instil public confidence in the Service.
- 10.2It is recommended that all CCTV signage is inspected on an annual basis to ensure compliance, and to document this inspection. This would have the additional benefit of ensuring that no signs had been removed or defaced.
- 10.3It would demonstrate transparency to publish the Annual CCTV Report on the respective Council websites.
- 10.4Investigations should be undertaken into the feasibility of benchmarking the Service against other Authorities of a similar size.

Dianne Hopper 22 February 2013