Policy:	CCTV & ANPR
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CLOSED CIRCUIT TELEVISION & AUTOMATIC NUMBER PLATE RECOGNITION POLICY

PURPOSE Wherever Closed Circuit Television (CCTV) and Automatic Number Plate Recognition (ANPR) camera systems are operated, for the welfare and security of businesses, employees, customers and others a policy document must be in place that clearly demonstrates the purposes of the CCTV & ANPR.

This CCTV & ANPR policy details the main issues that need to be addressed when operating a CCTV & ANPR system. It also includes recommendations of regular review processes and measures to ensure that the use of CCTV cameras within Astmoor Industrial Estate and Halebank Industrial Estates are lawful and professionally handled, and that the CCTV & ANPR system remains compliant with the requirements of the Data Protection Act. Guidance has been taken from the Information Commissioners Office document "In the picture: A data protection code of practice for surveillance cameras and personal information."

This policy also contains references to training, monitoring, access to recorded footage and any disclosure of CCTV & ANPR (CCTV) images to others.

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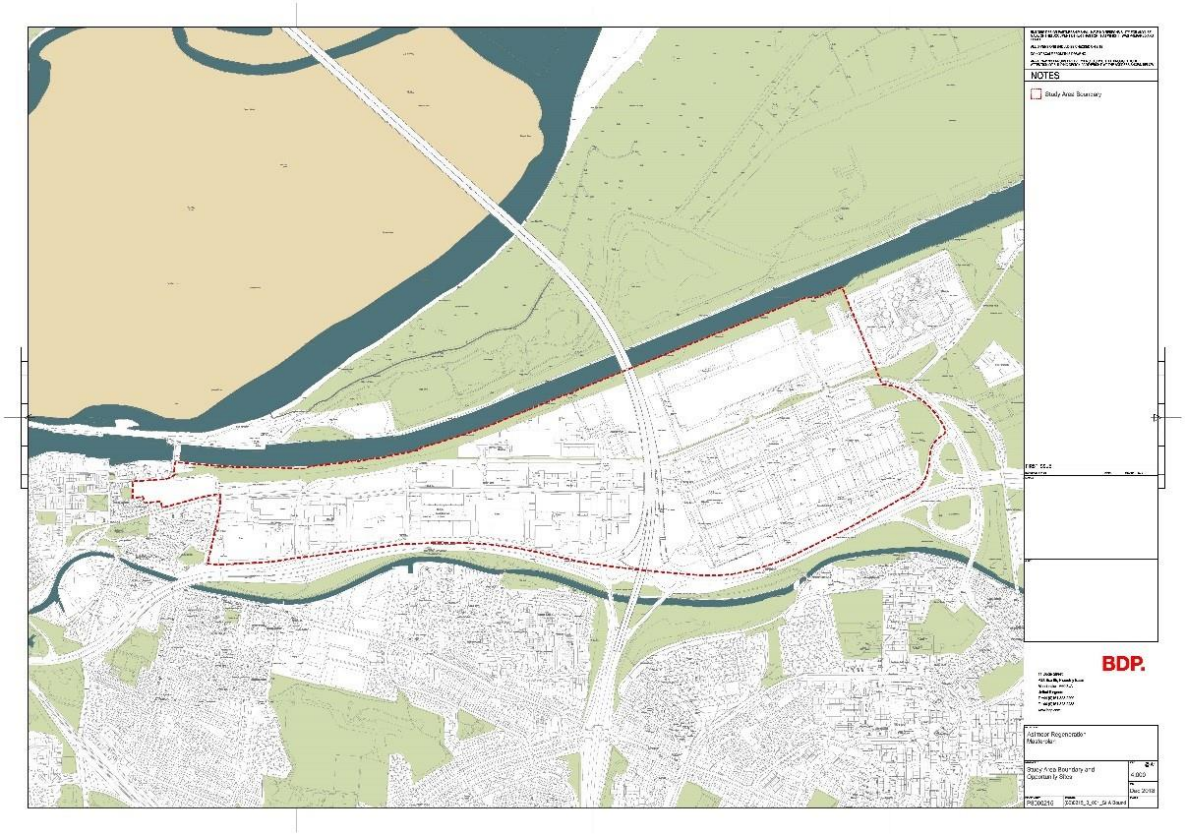
1. Introduction

Halton Chamber Enterprises Limited known as Halton BID uses CCTV to provide a safe and secure environment for businesses, employees, customers, visitors and others and to protect the Astmoor and Halebank Industrial Estate geographical area (see area edged red and shaded pink on the maps below).

Astmoor Industrial Estate



Halebank Industrial Estate

Halton BID CCTV Astmoor project system comprises of a *3*2 channel NVR, all cameras are IP and connect onto the CCTV Network. The system is accessed through software hosted by the instructed Security Provider with a total of 11 ANPR Cameras and 11 overview cameras.

HIK Vision Kit List

DS-2CD4A26FWD-IZH/P – ANPR Camera 2.8-12mm Lens x 11

DS-2CD2T42WD-I5 4MM– 4MP Bullet Camera for Overview, 4MM Lens x 11

DS-7732NI-I4/16P – 32 Channel NVR not including HDD. The units can support x4 HDD bays, with 6TB drive per bay

6TB hard drive x 4

East Entrance 1, 1 ANPR Cameras & 1 Overview Cameras (as per existing position),

East Entrance 2, 1 ANPR Cameras & 1 Overview Cameras (as per existing position)

East Exit 1, 1 ANPR Cameras & 1 Overview Cameras (as per existing position)

East Exit 2, 1 ANPR Cameras & 1 Overview Cameras (as per existing position)

East Bus way, 1 ANPR Camera and 1 Overview Camera to view entry (as per existing position)

East Bus way, 1 ANPR Camera and 1 Overview camera to view up the bus lane (addition to existing layout)

West Exit 1, ANPR Camera and 1 Overview Camera to view Astmoor Road (as per existing position)

West Bus Way, 1 ANPR Camera and 1 Overview Camera to view lane rear of Cargill (as per existing position)

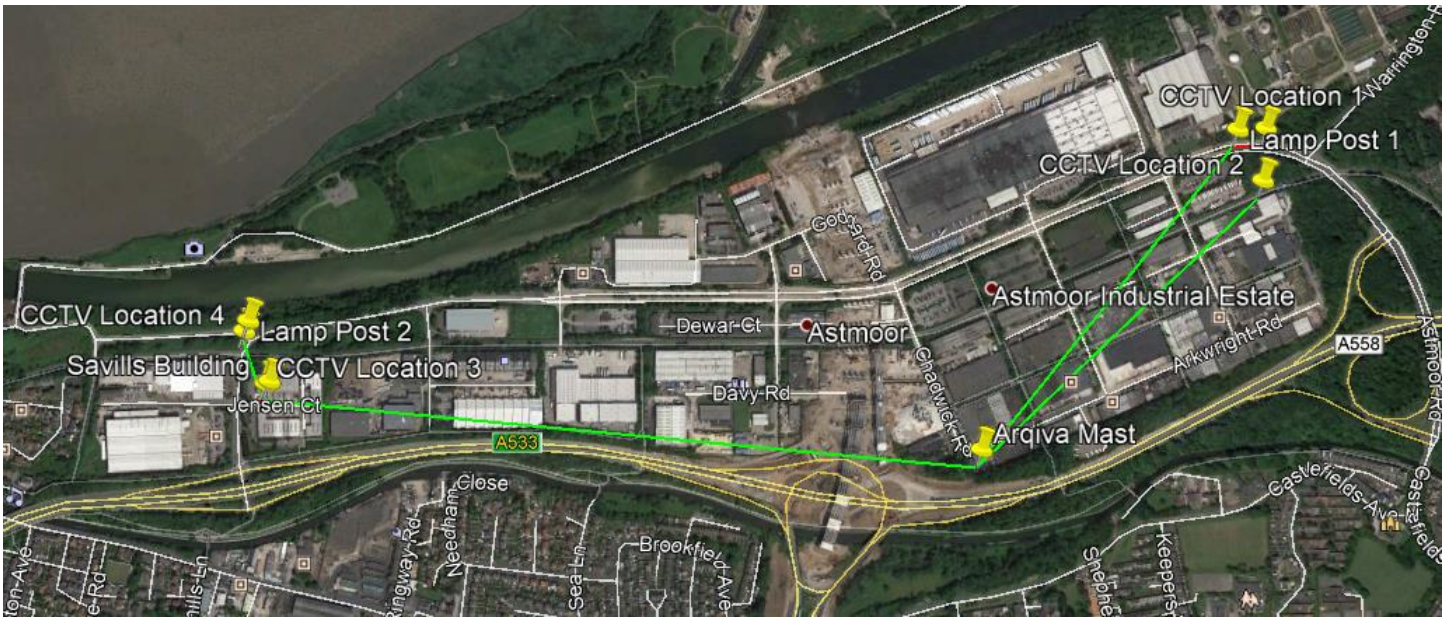
West Entrance, 1 ANPR Camera and 1 Overview Camera to view West Entrance traffic which passes Jenson Court and Lister Road (as per existing position)

Jenson Court 1, ANPR cameras and 1 Overview to view the entrance to the estate

Based on the distance 1 additional ANPR Camera and 1 Overview Camera to view entrance to Lister Road (addition to existing layout if required)

Halton BID CCTV Halebank project system comprises of a *3*2 channel NVR, all cameras are IP and connect onto the CCTV Network. The system is accessed through software hosted by the instructed Security Provider with a total of 15 ANPR and overview cameras.

Cameras are located at strategic points on both estates, principally along the main highways and entrances; no camera is hidden from view. Signs are prominently placed at strategic points and at the entrance to the area informing all staff and members of the public that a CCTV installation is in use. Additional equipment will consist of cable, switches and a router.



Halton BID (Halton Chamber Enterprises Limited) is the data controller and is legally responsible for compliance with the Data Protection Act 1998. This document sets out the accepted use and management of the CCTV equipment and images to ensure that Halton BID complies with the Data Protection Act 1998, Human Rights Act 1998 and other legislation, including to comply with the requirements of the 2008 CCTV Code of Practice, the Regulation of Investigatory Powers Act 2000 and the Private Security Industry Act 2001.

Halton BID first registered with the Information Commissioners Office (ICO) on the 12th August 2020 and will register each subsequent year going forward - the company is the data controller. The notification to the ICO covering the purposes for which the information is used, the disclosures that are made, and other relevant details.

2. Purpose of CCTV

The Halton BID has identified the following issue: "*Astmoor and Halebank experiences anti-social behaviour issues as well as malicious damage to property and illegal dumping. In addition, the area is visited by criminals breaking into units or stealing vehicles/vehicle parts and siphoning diesel during times when there is little business activity. Some areas of both industrial estates do not feel safe and there have been incidents of trespassing and vandalism"*.

Halton BID installed a constant real-time recording CCTV system with the clearly defined and specific purposes for the use of information identified below (and shared with all those who will operate the system):

- Deter crime;
- Assist in prevention and detection of crime;
- Assist with the identification, apprehension and prosecution of offenders;
- That there is good cause to suspect that an illegal or unauthorised action(s) is/are taking place or about to take place;
- Monitor security of the Astmoor and Halebank environment.

Before installing and using CCTV at Astmoor and Halebank Industrial Estates, Halton BID Board carried out a tender exercise for the Halton BID CCTV scheme on both estates. It was agreed that there was no need for constant monitoring.

Halton BID is responsible for day-to-day compliance with this policy.

3. Recording

All businesses, employees, customers and others visitors to both Astmoor and Halebank Industrial Estates are informed that recordings are taking place by A1 signs displayed across the site.

The NVR is positioned on Astmoor Road for Astmoor and Hough Green Garages for Halebank both in locked secure cabinets.

The digital recorder and screen is located within the control room at Direct Security. The control room is safe and secure and has restricted access to the relevant security staff.

Data is also stored on the cloud and Direct Security have advised that the information is protected by log in and password.

4. Cameras

Halton BID make every effort to position cameras so that they only cover the public areas in Astmoor and Halebank Industrial Estates, and that no cameras are focused on any residential accommodation or private business area.

Halton BID clearly display signs so that businesses, employees, customers and others are aware they are entering an area covered by CCTV. Although every effort has been made to ensure maximum effectiveness of the system it is not

possible to guarantee that the system will detect every incident taking place within the area of coverage. If, for any reason, any neighbouring domestic areas that border Astmoor or Halebank Industrial Estates are included in the camera view, the occupants of the property will be consulted prior to any recording taking place. Signs state: CCTV Images are being monitored and recorded 24 hours a day for your safety and to help prevent crime.

Retention CCTV images held on the hard drive of a PC or server will be held for no more than 30 days and then over-written. Images will be downloaded and stored on removable media such as CDs if and when required and will be erased or destroyed once the purpose of the recording is no longer relevant. A record or audit trail of this process is also captured.

5. Images Quality

Images produced by the equipment must be as clear as possible so that they are effective for the purpose(s) for which they are intended. The system will be reviewed monthly to ensure accuracy and that the equipment is working properly as follows:

I. Halton BID will not continue to use media once it becomes clear that the quality of the images has begun to deteriorate;
II. Where the location of the camera and time/date are recorded, these will be regularly checked to ensure they are accurate;
III. The cameras are sited so they will capture images relevant to the purpose(s) for which the system has been established;
IV. Cameras will be properly maintained and serviced and maintenance logs kept;
V. Cameras will be protected from vandalism, where deemed necessary, so that they are kept in working order;
VI. In the event that cameras break down or are damaged, [ ] are responsible for the maintenance of the cameras and they will be repaired and working as soon as practically possible.

6. Access to and Disclosure of Images to Third Parties

Access to, and disclosure of, images recorded on CCTV will be restricted and carefully controlled. This will ensure that the rights of individuals are retained, and also ensure that the images can be used as evidence if required. Images can only be disclosed in accordance with the purposes for which they were originally collected. Real time monitoring will not take place.

Access to Images

Persons authorised to view the images: Access to recorded images will be restricted to those persons authorised to view them, and will not be made more widely available.

Those authorised to view the recorded images are as follows and these names have been provided to CDA Solutions to be given online permissions to access the cameras:

- Joanne Taylor - Halton BID Manager
- Andrew Thompson – Direct Security
- Phil Delmar – Direct Security

Joanne Taylor has a password protected work mobile (property of Halton BID) which has the CCTV software loaded on it.

Viewing of images: Viewing of recorded images will take place in a restricted area to which others without authority will not have access while viewing is occurring. The monitoring or viewing of images from areas where an individual would have an expectation of privacy will be restricted to authorised personnel.

Removal & storage of images: when recorded images are removed for viewing purposes, this will be documented and securely stored with a copy to be retained by the BID Manager as well as the third party. Images can be removed without interrupting the operation of the system.

The information will be provided in a suitable format without losing image quality or time and date information and will be straightforward to use.

The following information should be documented when media is removed for viewing and a form completed as shown in Appendix 1:

1. Date and time the media was removed;

2. The name of the person removing the media;

3. The name(s) of the person(s) viewing the images;

4. The name of the business to which the person viewing the images belongs, or the person's organisation if they are from outside Halton BID;

5. The reason for viewing the images.

6. Crime number or log number (if applicable)

Access to images by a third party

If someone outside of Halton BID provides Halton BID with any CCTV Image processing services, for example editing information and blocking out other persons, a written contract will be put in place with clearly defined responsibilities to ensure that information is only processed in accordance with the instructions of the Halton BID Manager. The contract will also include guarantees about security, such as storage and the use of properly trained staff.

Disclosure of Images All requests for disclosure should be documented as shown in Appendix 1. If disclosure is denied, the reason should also be recorded.

Disclosures to third parties will only be made in accordance with the purpose(s) for which the system is used and will be limited to:

- Police and other law enforcement agencies, where the images recorded could assist in a specific criminal enquiry and/or the prevention of terrorism and disorder[1]
- Prosecution agencies;
- Relevant legal representatives;
- Insurance organisations (with the consent of the owner of the property that has been damaged or stolen);

[1] The registered controller or his/her designated agent, is the only person who can authorise disclosure of information to the police or other law enforcement agencies.

- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings);
- The owner of any property that has been damaged and captured on CCTV;
- In exceptional cases, to others to assist in identification of a victim, witness or perpetrator in relation to a criminal incident.

In addition to the information required in Section 6, Access to Images above, the following should be also documented: 1. If the images are being removed from the CCTV system or secure storage to another area, the location to which they are being transferred; 2. Any crime incident number or log number, if applicable; 3. The signature of the person to whom the images have been transferred.

Halton BID, as the organisation operating the surveillance system, have the discretion to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights. Once disclosure has been made to another body, such as the police, they become the data controller for the copy they hold. It is their responsibility to comply with the Data Protection Act in relation to any further disclosures.

Proactive checks or audits will be carried out by the Halton BID Manager on a regular basis to ensure that the procedures in this policy are being complied with.

7. Individuals' Access Rights

The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images. The controller responsible for the system will liaise with the Halton BID to determine whether disclosure of the images will reveal third-party information. Under the Freedom of Information Act 2000, a copy of this policy will be provided to anyone making a written request for it.

Requests for access to CCTV images must include:

- The date and time when the images were recorded;
- The location of the CCTV camera;
- Further information to identify the individual, if necessary.

How to make a complaint regarding usage of CCTV

For anyone wishing to make a complaint regarding the usage of CCTV they should, in the first instance, write to Halton BID Manager at :-

Joanne Taylor Halton Chamber 7th floor Municipal Buildings, Kingsway, Widnes WA8 7

BID@haltonchamber.co.uk

Appendix 1

DATE OF REQUEST:	
CCTV / ANPR FOOTAGE REQUESTED BY NAME & ORGANISATION:	Name: Business: Address: Telephone Number: Email:
BUSINESS LOCATED IN HALTON BID AREA A contractual letter will be agreed between Halton BID and the third party company in respect of security, storage etc.	Yes/No If No, details of process applied (costs and contractual letter):
REASON FOR REQUEST:	
FURTHER COMMENT / DETAILS OF FOOTAGE:	
MEDIA TYPE FOOTAGE SUPPLIED ON / WHERE THE IMAGES HAVE BEEN TRANSFERRED/STORED :	
CAMERA LOCATION:	
CRIME NUMBER: (if applicable)	
NAME AND SIGNATURE OF AUTHORISED PERSON VIEWING OR REMOVING THE MEDIA FROM SYSTEM:	Name: Organisation: Signature:
THE SIGNATURE OF THE PERSON TO WHOM THE IMAGES HAVE BEEN TRANSFERRED.	Name: Organisation: Signature: