LONDON BOROUGH OF HARROW

VSS and Surveillance Camera Policy June 2025

LONDON BOROUGH OF HARROW

Contents

LONDON BOROUGH OF HARROW

1. Policy Summary

1.1. The London Borough of Harrow (the Council) has in place a Video Surveillance System (VSS) and other surveillance systems. This policy details the purpose, use, and management of the systems, and details the procedures to be followed in order to ensure that the Council complies with relevant legislation and Codes of Practice where necessary. The London Borough of Harrow follows the current Surveillance camera code of practice[iii] in relation to VSS functions which will include audit and review.. This policy supports delivery of the Council's Community Safety Plan and Restoring Pride in Harrow vision.

1.2. This policy and the procedures therein detailed, applies to all the Council's VSS and surveillance systems, whether in public space or securing Council property. This policy also applies to Contractual provisions with such third-party service providers or partners who must ensure that contractors are obliged by the terms of this policy

1.3. VSS and surveillance system images are monitored and recorded in strict accordance with this policy.

2. Introduction

2.1. The Council uses VSS and surveillance system images for the prevention and detection of crime, public safety, anti-social behaviour (ASB), moving traffic enforcement, to monitor the Council's buildings in order to provide a safe and secure environment for staff, volunteers, contractors, and visitors, and to prevent the loss of or damage to the Council's contents and property.

2.2. The VSS and surveillance systems are owned and/or operated by the Council and managed by the Council. The Council is the system operator, and data controller, for the images produced by the VSS and surveillance systems, and is registered with the Information Commissioner's Office, Registration number Z597312X.

2.3. This policy applies to VSS and other surveillance camera devices that view or record individuals, and covers other information that relates to individuals, for

example vehicle registration marks captured by Automatic Number Plate Recognition (ANPR) equipment.

2.4. This policy uses the terms ‘surveillance system(s)’,‘VSS’ and ‘information’ throughout for ease of reference, and would include (but is not limited to) the following types of systems:

- Fixed VSS (networked, fiber, WiFi, 4G)
- Body Worn Video
- ANPR
- Stand-alone cameras (satellite Council owned sites)
- Redeployable VSS (4G)
- Vehicle cameras
- AI systems used within the VSS

3. Purpose

3.1. This Policy governs the installation and operation of all VSS and surveillance systems at the Council.

3.2. VSS surveillance is used to monitor and collect visual images for the purposes of:

- assisting in providing a safe and secure environment for staff, residents, and visitors to, the areas covered by the scheme.

- Helping to prevent and detect crime and provide evidential material for both civil and criminal court proceedings.

- assisting in the overall management of the Council.

- assisting in the management of the Council’s housing stock.

- assisting in the management of other locations and buildings owned or controlled by the Council.

- enhancing community safety and staff safety, to assist in developing the economic well-being of the borough and to assist in building a safer Harrow.

- assisting the local authority in their enforcement and regulatory functions within the borough.
- assisting with service performance
- assist in traffic management ensuring the safe and expeditious movement of traffic.
- assist in supporting criminal and civil proceedings.
- monitor all modes of travel to enable improvement and better management of the public highway (traffic cameras). Excluding excludes any camera system with relevant type approval of a prescribed device under Section 20 of the Road Traffic Offenders Act 1988 used exclusively for enforcement purposes, which captures and retains an image only when the relevant offence is detected and with no capability to be used for any surveillance purpose
- assist the Council in discharging its health and safety obligations towards staff
- assist in providing evidence following allegations of misconduct

4. Scope

4.1. This policy applies to all VSS and related surveillance systems operated by the Council.

4.2. This policy is applicable to, and must be followed by all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers and Council Members.

4.2. All staff involved in the operation of the VSS will be made aware of this policy and will only be authorised to use the VSS in a way that is consistent with the purposes and procedures contained therein.

4.3. All systems users with responsibility for accessing, recording, disclosing or otherwise processing VSS images will have relevant skills and training on the operational, technical and privacy considerations, and fully understand the policies and procedures.

LONDON BOROUGH OF HARROW

5. Policy Statement

5.1. The Council will operate its VSS systems in a manner that is consistent with respect for the individual's privacy.

5.2. The Council complies with the Information Commissioner's Office (ICO) CCTV guidance and the Biometric & Surveillance Camera Commissioner's Surveillance guidance to ensure the VSS is used responsibly and safeguards both trust and confidence in its continued use.

5.3. The VSS will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

5.4. The use of the VSS will be conducted in a professional, ethical, and legal manner, and any diversion of the use of VSS security technologies for other purposes is prohibited by this policy.

5.5. Cameras will be sited as far as is possible, so that they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:

- cover the specific area to be monitored.
- keep privacy intrusion to a minimum;
- ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
- minimise risk of damage or theft

5.6. Appropriate signage is provided at all VSS locations and on the exterior of vehicular CCTV to allow persons to know that it is in use.

5.7. Before any VSS is installed, service areas will consider other, less intrusive methods to achieve the objectives of having a VSS in place (e.g. improving lighting in an area to prevent crime).

LONDON BOROUGH OF HARROW

6. Location and signage

6.1. Cameras are sited to ensure that they cover the relevant areas. Cameras are installed throughout the site/s including roadways, car parks, buildings, premises, within buildings and vehicles, and externally in public facing areas.

6.2. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the relevant area, which may include outdoor public spaces.

6.3. Signs are placed wherever the VSS is in operation, to inform individuals that surveillance is in operation.

6.4. The signage indicates that monitoring and recording is taking place, for what purposes, who the system owner is (if it is not obvious), and where complaints / questions about the systems should be directed.

7. Monitoring and Recording

7.1. Cameras are monitored in secure offices and locations.

7.2. System administrators can view and access footage for the purposes for which the VSS is in operation.

7.3. Images are recorded on secure servers and are viewable by the system administrators. Additional staff may be authorised by the system administrator to access images from cameras sited within their own areas of responsibility.

7.4. Any staff who have access to the system are made aware of their roles and responsibilities relating to the system by the system administrator, who will also provide them with the necessary skills and knowledge to use and manage the system.

7.5. Staff who have access to the system will receive training as needed, to ensure their competence relating to relevant operational, technical, privacy considerations, policies and procedures.

7.6. Operating staff will be vetted to NPPVII level in accordance with Metropolitan Police data sharing requirements.

7.7. Where service areas are using Cloud-based storage, they will ensure that such storage meets all relevant security and data protection measures.

7.8. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.

7.9. Viewing monitors and laptops should be password protected and switched off / locked when not in use, to prevent unauthorised use or viewing.

7.10 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose, and that the date and time stamp recorded on the images is accurate.

8. Covert Surveillance

8.1. Covert surveillance is the use of hidden cameras or equipment to observe and / or record the activities of a subject which is carried out without their knowledge.

8.2. The use of covert cameras or recording / monitoring will be restricted to rare occasions, in accordance with the Regulation of Investigatory Powers Act 2000.

8.3. Covert surveillance will only be undertaken with prior RIPA authorisation from a designated Council Officer and judicial approval where applicable.

9. Employee Monitoring

9.1. Any use of Council VSS to monitor staff (either overtly or covertly) must be done so in accordance with the Council's Employee Rights policies, the Human Rights Act (1998) The Protection of Freedoms Act (2012), and where applicable, the Regulation of Investigatory Powers Act (2000).

9.2. The use of VSS images to monitor staff must only be used following a formal accusation of Criminal or Civil infractions to assist in formal investigations by

supplying the necessary data, or for health and safety purposes

9.3. Body Worn Video (BWV) cameras with the functionality of GPRS tracking must only have the GPRS data used for staff safety purposes. Using GPRS data from BWV cameras to track staff movements for any other reason other than formal safety concerns is strictly prohibited for all system users.

10. Data Protection Impact Assessments

10.1. 10.1 In its administration of its VSS, the Council complies with the General Data Protection Regulation (UK GDPR). the Data Protection Act 2018 (DPA), and in accordance with its own Data Protection Policy.

10.2. The Council's VSS (new and existing) are subject to its own Data Protection Impact Assessment (DPIA), identifying risks related to the installation and use of the system, ensuring full compliance with the data protection principles. This will include consultation with relevant internal and external stakeholders.

10.3. Once systems are operational, system administrators will conduct reviews of the DPIA as and when required for their system.

11. Subject Access Requests

11.1. Requests by individual data subjects for images relating to themselves via a Subject Access Request can find email details for submission via the Harrow Council website.

11.2. In order to locate the images on the system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

11.3. A search request should specify reasonable accuracy for time, location and subject matter.

11.4. A request for images made by a third party may only be done so by either a recognised Government Authority or proven authority acting directly on behalf of the subject e.g. Insurance companies.

12. Third Party Disclosures

12.1. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

12.2. Such disclosures will be made at the discretion of the system administrator, with reference to relevant legislation.

12.3. A log of any disclosure made under this policy will be held by the relevant system administrator. The log should include (at a minimum) the date that a disclosure was made, the recipient, and the reason for disclosure.

12.4. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.

12.5. Where information is disclosed, the disclosing officer must ensure information is transferred securely, and instructions on the use of the images given to the recipient.

13. Retention

13.1. Unless required for evidentiary purposes, the investigation of an offence, or as required by law, VSS images will be retained for no longer than 31 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time. Where there is a demonstrable need for extended retention, this will be reviewed and approved by the Data Protection Officer and logged accordingly.

13.2. Any footage downloaded and retained for evidential purposes will be deleted once no longer required.

13.3. VSS disclosure logs should be kept for 6 years.

14. Complaints Procedure

14.1. Complaints concerning the Council's use of its VSS or the disclosure of VSS images should be made in the first instance to the service area controlling the system. The contact details should be found on the signage for the relevant system.

14.2. Depending on the nature of the complaint, it will either be processed under the Council's Corporate Complaints procedure, or (more likely) treated as a data protection concern to be investigated by the Council's Data Protection Officer.

14.3. If complainants remain dissatisfied after the Council's internal processes, they may escalate the matter to the Information Commissioner's Office (ICO).

15. Management

15.1. The Council's Place Directorate has oversight of this policy. The Senior Responsible Officer (SRO) is Calvin Mclean, Director of Environment.

15.2. The Council will only purchase and utilise cameras, networking and recording equipment that has been deemed suitable by the Home Office, taking into account both ethical and security concerns raised by the Home Office. This applies to both highways enforcement cameras and all other VSS utilised by the Council.

15.3. The Council VSS network and systems will be subject to bi-annual penetration testing by an independent third party to ensure data integrity.

15.4. All operating staff to be cleared to NPPVII security clearance.

15.5. The London Borough of Harrow will maintain a suite of standard operating procedures and Code of practice documents for each service area underpinned by data protection impact assessments. These will be reviewed annually or in relation to specific changes in guidance or practice.

15.6. The London Borough of Harrow will maintain a protocol document setting out the policy and guidelines of the Council on issues involved in the planning

for, and deployment of the Council's Rapid Re-deployable CCTV cameras (RDC).

15.7. The aim of the protocol is to ensure that requests for RDC installations are compliant with the relevant statutory legislation, guidance and codes of practice but also balanced with the need to respond to the dynamic operational requirements. The protocol also sets out the responsibilities of specific personnel within the council to manage the installation, maintenance and governance of RDCs within the borough.