

CCTV PROTOCOL

South Oxfordshire & Vale of White Horse District Council

March 2015

The purpose of this document is to:-

- Lay out guidelines to ensure that the South Oxfordshire & Vale of White Horse District Council complies with the Data Protection Act 1998.
- Ensure that the images captured by our CCTV systems are adequate and usable.
- Reassure those whose images are being captured of our objectives and intentions for the use of those images.

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1. Principles of the Data Protection Act

The legal requirement for use of CCTV camera systems is to comply with the 1998 Data Protection Act. In order to do so we must conform to the following principles, which state that all personal data collected must be:-

- fairly and lawfully processed;
- processed for limited purposes and not in any way deemed incompatible with those specific purposes;
- adequate, relevant and not excessive;
- accurate;
- not retained for longer than necessary;
- processed in accordance with individuals' rights;
- held securely;
- not transferred to a territory outside of the European Economic Area unless adequate protection is guaranteed.

These principles will form the basis of this protocol, alongside the Information Commissioner's Office (ICO) CCTV Code of Practice, published in 2008.

2. Objectives

The primary purposes for which we have elected to use camera systems are as follows:

2.1 Insurance purposes

As a public body, South Oxfordshire & Vale of White Horse District Council receives a large number of insurance claims. False claims waste administrative time and can potentially lead to unnecessary pay-outs. Equally, some operatives are reluctant to admit to accidents due to the fact that they may be subject to a driver assessment or other perceived punishment as a result. False denials could mean that some genuine insurance claims are disregarded.

How CCTV can meet these needs:-

The ability to review footage captured at the time and location of alleged incidents will allow us to provide evidence in the case of a false insurance claim, or conversely to recognise our liability in cases of false statements by operatives. This would have the additional advantage of allowing us to accurately identify drivers who may require assessment following repeated accidents, rather than relying solely on staff reporting or admitting to incidents.

Overall, access to an accurate and impartial record of accidents will allow insurance claims to be resolved fairly, whether false or otherwise.

Alternatives to CCTV:-

There would be no other practicable way to obtain the quality and accuracy of information that is achievable with continuous CCTV recording on our vehicles. An accident or an allegation can occur at any time during the working day of the vehicle, so any form of intermittent monitoring would be insufficient.

Provisos:-

1. If releasing footage to third parties such as insurance companies, appropriate guidelines must be followed. See section 4.2.
2. The time and date settings of the memory cards must be correct at all times.
3. The quality of the images must be sufficient to show the incident clearly and unambiguously.
4. Cameras must be placed in such a position as to offer the greatest possible coverage of all angles and areas of the vehicle. This should be regularly checked to ensure that data is useable as evidence.
5. Footage must not be altered or tampered with in any way whatsoever. For this reason, memory cards should be locked down securely within the vehicle and any downloaded footage should be password protected by the authorised administrator.

2.2 Health and safety purposes

Despite adequate staff training, some operatives adopt methods that may jeopardise their health and safety. Examples of this could include riding outside of the cab while the vehicle is in motion, 'Hand balling' refuse, reversing without a banks man or failing to use PPE provided. Left unchecked these 'shortcuts' significantly raise the risk of serious accidents.

How CCTV can meet these needs:-

The provision of CCTV cameras on the heavy vehicles in particular could help to monitor staff practices in certain appropriate circumstances. Whilst monitoring footage on a regular basis would be disproportionate to the problem, it is practical to carry out random checks to ensure that all safe working practices are adhered to, these checks will be recorded to demonstrate a proactive approach to duty of care and staff well being.

In the case of specific concerns we would have access to footage that provides a useful insight into our staff's health and safety at work. Should footage reveal a serious concern, it would allow us to address the problem with the member of staff involved. This will include using recorded footage where relevant as part of any disciplinary action.

In addition, the knowledge that vehicles are equipped with CCTV may deter staff from engaging in dangerous practices and encourage them instead to adopt the standard methods that they are trained to use.

Alternatives to CCTV:-

We already have several measures in place including spot-checks and ensuring that crews come under occasional monitoring by supervisors during their rounds however, although behaviour may be affected it may then return to normal once monitoring ceases. Further training would also be unlikely to cause significant alterations in behaviour, since staff are already aware of standard practice but may choose other methods for reasons of speed and ease.

Provisos:-

1. The use of the footage must be limited to appropriate circumstances. Footage should be viewed for review purposes when an operational, staff performance or safety concern exists. It should not be used for any infringement of personal privacy or to view an incident that is not of concern. This is to ensure that our usage of CCTV for this purpose is not excessive. However, if while viewing footage for another purpose, the administrator sees something that they cannot be expected to ignore, further investigation is also acceptable.
2. The quality of the footage must be sufficient so that staff cannot be wrongly identified or their actions misinterpreted.

3. Footage must not be altered or tampered with in any way whatsoever. For this reason, memory cards should be locked within the vehicle and any downloaded footage should be password protected by the authorised administrator.

2.3 Protection of our staff

Our staff often experience verbal abuse and threatening behaviour from members of the public and can at times be put at risk of violence. Offering protection to our staff must be prioritised to combat this serious issue.

How CCTV can meet these needs:-

CCTV will ensure that all incidents involving abusive, threatening or violent members of the public are recorded, thus allowing us to take further steps where necessary. In the unlikely event of physical violence against our staff, footage could be used in a court of law as evidence against the defendant.

The vehicles which have onboard CCTV recording facilities have signs to inform the public, which may affect their behaviour and the likelihood of an abusive or violent incident occurring. Our staff would also be able to repeat this message to any threatening members of the public, warning them that their actions were being recorded. This may contribute to a feeling of increased safety amongst staff.

Alternatives to CCTV:-

We already have several measures in place to prevent unnecessary risk to any member of staff employed by South Oxfordshire & Vale of White Horse District Council. For this specific purpose, staff working at the civic amenities site already use portable CCTV cameras which can be used to capture incidents of abuse if they arise. The use of CCTV recording on the vehicles simply extends this protection, in a way that would not be possible through other methods not currently in use.

Provisos:-

1. The use of the footage must be limited to appropriate circumstances. Footage should be viewed for review purposes when an operational, staff performance or safety concern exists. It should not be used for any infringement of personal privacy or to view an incident that is not of concern.
2. The quality of the footage and/or audio recordings where appropriate must be sufficient for reliable identification and must capture the incident clearly.
3. Footage must not be altered or tampered with in any way whatsoever. For this reason, memory cards should be locked within the vehicle and any downloaded footage should be password protected by the authorised administrator.

2.4 Performance management

The public is entitled to expect the highest standards of conduct from all employees who work for local government and their contractors. A detailed Code of Conduct exists outlining laws, regulations and conditions of service and provides further guidance to assist South Oxfordshire & Vale of White Horse District Council and Biffa employees in their day-to-day work.

Crews have specific tasks and working practices to adhere to in order to achieve the level of performance expected as part of their employment duties. Deviation from the established 'rules' of service can endanger staff, risk service delivery and bring the Council and Biffa into disrepute.

How CCTV can meet these needs:-

The vehicles which have onboard CCTV recording facilities provide managers with the ability to gather both historical and live web based performance related data without the need to compromise the daily operation.

CCTV will ensure that performance standards are maintained through a process of regular review and report; this would include pro-active investigations to establish the demands of specific tasks and live web viewing to provide real time information to facilitate response measures.

In the event of an incident that provides reason for concern with regards employee conduct or performance related issues, footage would be used appropriately in relation to the incident. This will include using recorded footage where relevant as part of any disciplinary action.

Alternatives to CCTV:-

There are alternative technologies available that provide performance management tools such as GPS tracking and on-board vehicle telemetry (vehicle inputs / outputs) However CCTV is unique in its ability to monitor and review a service at an individual level, providing detail that can be actively used to manage performances at a corporate and personnel level.

Provisos:-

1. The use of the footage must be limited to appropriate circumstances. Footage should be viewed for review purposes when an operational, staff performance or safety concern exists. It should not be used for any infringement of personal privacy or to view an incident that is not of concern.
2. The quality of the footage and/or audio recordings where appropriate must be sufficient for reliable identification and must capture the incident clearly.
3. Footage must not be altered or tampered with in any way whatsoever. For this reason, memory cards should be locked within the vehicle and any downloaded footage should be password protected by the authorised administrator.

3. Using the equipment

3.1 Selecting the equipment

Our requirements for CCTV recording are based around the usage of the vehicles themselves. To record for significant amounts of time outside of the working day of the vehicle would therefore not be measured or proportionate. For this reason, we came to the conclusion that to meet our needs, our CCTV systems should be activated by ignition and switch off shortly after the engine. This is in line with the product choices that we have made.

We have also chosen settings which allow us to capture images of sufficient size, resolution and frames per second and to automatically write over old footage once it is no longer needed. Our systems are designed to capture up to eight days' recording, generally at eight hours per day, ensuring that data is not retained on memory card for longer than necessary.

The products that we chose were supplied by Innovative Safety Systems Ltd.

3.2 Siting the cameras

Camera location has been carefully considered to provide the driver with the most effective view of the vehicle to assist with close quarters manoeuvring and with improved crew awareness.

To comply with the requirement that recordings be adequate and relevant to the objectives for which they are intended. Cameras must be placed so as to fully capture the required range of angles and areas of the vehicle without interfering with its effectiveness as a driver aid. As all areas surrounding the vehicle are of potential interest, there is no need to consider restrictions on viewing areas that are not intended to be the subject of surveillance.

On our RCVs, four cameras are necessary to provide adequate coverage. These cameras are positioned on the near side and off side front and rear.

The position of these cameras must not be tampered with, none of the individual cameras should be obscured, and a camera should never be angled by the driver in order to focus on one particular individual, group or property.

3.3 Using the equipment

The equipment must be maintained and checked regularly to ensure that usable, adequate footage is being produced. This includes a regular check that the time and date stamp recorded on the images is accurate. When a problem is identified, such as loss of recording function from one or more cameras, an engineer must be called in as soon as possible to restore the system to full working order.

Basic safety precautions must be followed at all times to reduce the risk of fire, electric shock and personal injury. These are as follows:-

- Follow all warnings and instructions on the product.
- Unplug the memory card from the power outlet before cleaning. Do not use liquid or aerosol cleaners. Use a damp cloth for cleaning.
- Do not use the memory card near water.
- Do not allow anything to rest on the power cords. Do not place in a location where the cords can be stepped on or where someone can trip over them.
- Do not use near any area where there is a potential gas leak or near any explosive fumes.
- Do not place near or over a radiator or any other heat source.
- Use only the power cord supplied with the system.
- Do not overload the wall outlet or power cord where the power cord is installed as this can result in fire or electric shock.
- The equipment must only be opened by a qualified serviceperson. Opening the equipment may expose you to dangerous voltage. Incorrect re-assembly may result in electric shock.
- Avoid spilling liquid on the equipment.
- Do not insert any objects through the ventilation slots.

3.4 Audio recording

Audio recording is discouraged by the ICO. It should not be used to record conversations between members of the public as this is deemed excessively intrusive and unlikely to be justified. VWS Ltd equipment was not supplied with audio capability.

4. Using the data

In order to ensure compliance with the Data Protection Act, we must meet sufficient standards in handling and processing the information captured by our CCTV systems. To this aim, it is important to establish who has responsibility for the control of the images and who is to be given permission to view or download them. The table below illustrates how we intend to divide these responsibilities.

Table A

Data controller		
Business Manager <i>Responsible for selecting the equipment and agreeing policies for its usage.</i>		
Business Manager	Operations Manager	Supervisors
<i>Responsible for selecting the equipment and ensuring that policies regarding its usage are followed.</i>	<i>Responsible for ensuring that equipment is correctly set up and policies are followed.</i>	<i>Responsible for ensuring that equipment is correctly set up and policies are followed.</i>
<i>Responsible for viewing and downloading images and supplying them to our insurance company where necessary.</i>	<i>Responsible for viewing and downloading images. Responsible for storing data and control and issue of copies.</i>	<i>Responsible for viewing and downloading images.</i>

In order to maintain our standards, we will also proactively check procedures are being complied with on a regular basis.

4.1 Storing and viewing the images

All those whose responsibilities are listed above as including viewing and downloading the images will be issued with a clear protocol. This will outline defined and specific purposes for the use of the images (relating to Section 2) as well as clear procedures for how the images should be handled. We do not require processing services from anyone outside of our organisation, so there is no need for further action to ensure that the images are only processed in accordance with our instructions.

Recorded material should be stored in a way that maintains the integrity of the image. If this is not done, the footage may not be of use in a court of law (thus undermining the validity of using CCTV), and may not protect the rights of individuals who have been recorded. In our case, footage is stored in an appropriate format and quality within the memory card and can be transferred to a computer without loss of quality.

Recorded material must also be held securely. Our memory cards are situated within the vehicles, where they are only accessible with a key distributed. The memory card is removed from the vehicle and connected to a computer. During this transfer, sufficient steps must be taken to keep the memory card secure. It should only be taken out for the amount of time required to download the footage and then immediately replaced or safely stored. This can be done without interrupting the operation of the system, as recording ceases around thirty minutes after the ignition is switched off. Downloads should therefore occur once the vehicle is no longer in use and has been inactive for at least thirty minutes.

Material recorded on the memory cards should **only** be viewed or downloaded when at least one of the objectives outlined in Section 2 would be met by doing so. It should never be accessed for reasons that would undermine an individual's personal privacy.

In order to download the footage, administrators must follow the instructions provided by the manufacturer. These are summarised in the administrators' protocol. Files can then be stored in a password-protected folder on a networked computer. They must never be stored as personal files or saved on personal devices. In the case of a need to transfer the footage, for example to another department or to South Oxfordshire & Vale of White Horse District Council, files can be copied to a disc without loss of quality. Files transferred in this way should always be password protected.

Administrators should view images appropriately and not show them to other staff unless they are also authorised.

Drivers may view live images on the dashboard-mounted screen without restriction, as the scene displayed is also in plain sight.

4.2 Disclosure

Disclosure of CCTV images must be controlled and consistent with the purpose for which the system was established. For this reason, material should only be disclosed to third parties when at least one of the objectives outlined in Section 2 would be met by doing so. An example of this would be releasing footage to our insurance company in support of a motor claim form.

The only exception to this requirement is in the case of the prevention and detection of crime. It is always acceptable to disclose images to law enforcement agencies if failure to do so would be likely to prejudice the prevention and detection of crime.

Any other requests for images should be approached with care, as wide disclosure may be unfair to individuals concerned. In the limited circumstances where such disclosure may be deemed necessary, sufficient safeguards should be in place to ensure that images are transferred securely, are not tampered with and remain as private as possible. If an agreement is reached to release the footage, the date of the disclosure must be recorded along with details of who the images have been provided to and why.

Judgements about disclosure are to be made at our own discretion, unless there is an overriding legal obligation such as a court order or information access rights. Once images have been disclosed to a third party, the third party becomes the data controller for their copy of the images and has its own responsibility to comply with the Data Protection Act.

4.3 Retention

There is no legal minimum or maximum retention period, but we should not keep recorded materials for a period of time longer than our purposes require. However, should a law enforcement body become involved, we may retain them for longer than this period to give the body sufficient opportunity to view the images.

We have chosen systems which allow for eight continuous days of recording, generally at eight hours per day. After this point, recordings will be overwritten automatically by new footage. These settings have been selected to ensure that footage is retained for long enough for incidents to come to light (in the case of insurance claims, which can be delayed), but not longer than required.

If no issues arise within the eight day period, permanent deletion of the footage will occur as standard. If, however, data is downloaded for a specific purpose, it will be retained until such a point as it is no longer needed, such as once an insurance case has been closed. At this point it must be permanently deleted by the Business Manager who provided the data. Systematic checks will also be put in place to ensure that this is being done.

5. Responsibilities

5.1 Informing the public

Members of the public whose image may be recorded by our CCTV systems have the right to be informed. A simple way to achieve this is via signage. Since the range of image capture relates to the surroundings of the vehicle, the best location for signs is the exterior of the vehicle. The cameras themselves are rather discreet, for which reasons signs should be placed at each location where a camera is present. These signs should be clearly visible; contain details of why CCTV is being used and be of an appropriate size for the context. Where audio is recorded, this should be stated explicitly and prominently.

As it is clear that the recordings are being made by Biffa on behalf of South Oxfordshire & Vale of White Horse District Council, there is no need to specify this on the signage. An exception would occur if the vehicle was not sign-written to identify it as a South Oxfordshire & Vale of White Horse District Council vehicle, in which case the CCTV signage should include our name and who to contact with any concerns.

The signs currently in use on our vehicles, pictured below, measure around 150mm x 210mm.

CCTV
IN OPERATION



**Images are being recorded
for crime prevention and
Health & Safety purposes**

**Please call: 01865 409 570
for further information**

5.2 Subject access requests

Individuals whose images are recorded have a right to view the images in question and, if they so desire, to be provided with a copy of them. Upon receipt of a subject access request, we must provide the requested data within 40 calendar days and charge no more than the current statutory maximum of £10. The individual who makes the request must provide details which allow us to identify them as the subject and to locate the images on our system. This may include a photograph, a description of clothing worn and/or an accurate time, date and location.

5.3 Freedom of information

As a public authority, we may from time to time receive requests under the Freedom of Information Act 2000 (FOIA). However, we are exempt from releasing private information such as CCTV footage under the FOIA if either of the conditions of the two-part exemption is met:-

1. The images are those of the requester. In this case the request should be treated as a subject access request.
2. The images are of other people and disclosing them would breach the data protection principles (see Section 1).

In the case that these conditions are not met, contact the legal department who will offer further advice.

5.4 Notification under the DPA

We must inform the ICO of fundamental changes in the way that South Oxfordshire & Vale of White Horse District Council holds or processes personal information and the purposes for which data is recorded. Although the information provided must by no means be exhaustive, our current register entry has been updated following the implementation of onboard CCTV across the fleet. Advice on this has been sought from the legal department.

Appendix 1

Table of vehicles and CCTV systems

Vehicle	Type	Division	CCTV system	Audio facilities
GK09 OWG	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWH	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWA	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWC	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWE	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWF	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWR	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK09 OWZ	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
A20 FMV	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZY	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZZ	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZP	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZR	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZS	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZW	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZN	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
VO09 MJX	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZX	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None
GK60 XZU	Refuse/Recycling vehicle	Waste	360 degree (4x cam)	None

Appendix 2

CCTV protocol

This document is intended onboard CCTV recording facilities and contains guidelines for complying with the 1998 Data Protection Act.

Setting up the equipment

The equipment settings, such as those relating to image quality or frames per second, are at your discretion. Please review the full CCTV protocol in order to assess the settings that you feel are most consistent with the purposes of the system. The decision to enable or disable audio recording should be given particular consideration.

Additionally, the time and date stamp must be correct, and any faults, once identified, must be rectified as soon as possible. You should regularly inspect the equipment to check that it is functioning correctly and that all settings are as required.

Providing training and communicating objectives

You must ensure that staff responsible for viewing and downloading CCTV footage within your section receive adequate training. This can be arranged through Biffa's IT and Fleet Department.

You should clearly communicate the purposes of CCTV to staff. All staff who view or download footage must be made aware that they must do so **only** where one or more of the following objectives will be fulfilled:-

1. Insurance purposes, such as investigating the validity of claims.
2. Performance management, reviewing operations and staff performance.
3. Health and Safety purposes, to proactively ensure good working practices and employee well being.
4. Providing evidence of abusive, threatening or violent incidents against members of staff, for staff protection.

Ensuring that drivers use the equipment correctly

Drivers of vehicles with onboard CCTV systems should not tamper in any way with the set-up of the equipment or try to access the memory card for any reason. Please ensure the following:-

- that drivers receive a copy of 'CCTV protocol for drivers', which contains safety information and instructions;

- that drivers or passengers do not obscure the cameras, either deliberately or otherwise;
- that drivers are aware that under no circumstances must cameras be angled to capture a specific individual, group or property;
- that drivers are informed of the procedure for reporting any defects in the equipment;

Storing, viewing and transferring the images

The viewing and downloading of CCTV footage is to be limited to agreed members of staff. Please ensure that these staff receive a copy of 'CCTV' protocol, and that they follow the procedures outlined therein.

In general, footage should only be disclosed to third parties in the following cases:

- to support a motor claim form in the case of a false insurance claim;
- where footage relates to a criminal case, under which circumstances it should be provided securely to the Police only;
- in the case of a subject access or freedom of information request (contact the legal department for more information).

Once downloaded footage is no longer required, it must be deleted. Please check that administrators have a procedure in place to ensure the permanent deletion of images that are no longer needed and that this is taking place in practice.

Other responsibilities

If, for any reason, vehicles with onboard CCTV facilities are not labelled as such, please request signs from the Data Controller / Business Manager (please see Table A). If your vehicle is not sign-written, you will need a sign informing the public that recordings are being made and including a contact number.

Appendix 3

CCTV protocol for drivers

This document is intended for all drivers of vehicles with onboard CCTV recording facilities.

Your vehicle is equipped with CCTV recording equipment for the purposes of investigating accidents, monitoring performance, processing insurance claims; responding to health and safety concerns, duty of care, and for your own protection against threatening, abusive or violent members of the public.

Using the equipment

Your manager should check that the equipment is properly set up. You should not need to adjust the position of the cameras or change the settings in any way.

You can use the rear camera as a reversing aid.

Defecting the equipment

If you notice a fault with the equipment, it should be recorded on your defect sheet just like any other problem with the vehicle. It is important that all faults are reported and rectified as soon as possible.

Informing the public

If you are approached in a threatening or verbally abusive manner by a member of the public, you may wish to remind them that their actions are being recorded on CCTV.

If a member of the public objects to the presence of recording equipment on your vehicle, simply provide them with the standard contact centre number of 01865 409 570. There is information available upon request to explain why we have introduced CCTV systems on our vehicles and how we operate them within legal requirements.

Safety information

There is no reason why you should need to access the memory card or remove it from the vehicle. However, if you do come into contact with it for any reason, please follow the safety precautions overleaf.

- Follow all warnings and instructions on the product.
- If cleaning the memory card, unplug it from the power outlet first. Do not use liquid or aerosol cleaners. Use a damp cloth for cleaning.
- Avoid getting liquid on or near the equipment (including the screen).
- Do not allow anything to rest on the power cords. Do not place in a location where the cords can be stepped on or where someone can trip over them.
- Do not use near any area where there is a potential gas leak or near any explosive fumes.

- The equipment must only be opened by a qualified serviceperson. Opening the equipment may expose you to dangerous voltage. Incorrect re-assembly may result in electric shock.
- Do not insert any objects through the ventilation slots.

Appendix 4

CCTV protocol for Principal Officers & Compliance Officer

This document provides guidelines for all Officers responsible for viewing and downloading CCTV footage from South Oxfordshire & Vale of White Horse District Council vehicles.

You should have received training on how to remove the memory card, connect it to the computer, view, download and store the images. If you are unclear about any of these aspects, or would like further training, contact the Data Controller / Business Manager (please see Table A) who can arrange this for you.

Conditions for viewing or downloading footage

You must only view the footage if one or more of the following objectives will be fulfilled:

1. Insurance purposes, such as investigating the validity of claims.
2. Operational or staff performance, where review will provide data to assist with performance management.
3. Health and safety purposes, to proactively ensure good working practices and employee well being.
4. Providing evidence of abusive, threatening or violent incidents against members of staff, for staff protection.

When viewing the footage, follow the standard procedures as instructed. Please do not show the footage to others who are not authorised to view it.

Handling the Memory Card

Memory card locations vary from vehicle to vehicle, but most are within the glove box. The glove compartment must be unhooked and folded down to reveal the memory card behind.

Please wait for at least thirty minutes after the vehicle's last use before removing the memory card. Once you have removed it from the vehicle, please try to keep it out for the minimum time that will allow you to access the footage that you need and then return it promptly. Take care to keep the memory card safe and secure, and, if at all possible, do not leave it unattended.

When handling the memory card, the following precautions should be observed to protect your personal safety:

- Follow all warnings and instructions on the product.
- Avoid getting liquid on or near the equipment.
- Do not allow anything to rest on the power cords. Do not place in a location where the cords can be stepped on or where someone can trip over them.
- Do not place near or over a radiator or any other heat source.
- Use only the power cord supplied with the system.
- Do not overload the wall outlet or power cord where the power cord is installed. This can result in fire or electric shock.
- The equipment must only be opened by a qualified serviceperson. Opening the equipment may expose you to dangerous voltage. Incorrect re-assembly may result in electric shock.
- Do not insert any objects through the ventilation slots.

Storing the footage

If you need to retain any footage that you have found on a memory card (for insurance purposes for example), download it as per your training. Do not save more footage than you actually require. Save files on the network only and password protect them. Do not save them on any personal devices.

Disclosing footage to third parties

You may need to transfer a file to our insurance company or to the Police. If you do so, password protect the file to ensure that it only reaches the intended recipient. In the case of any other requests for disclosure, consult your manager as to how to proceed.

When releasing footage, please keep a log of who it was given to, when and why.

Retention of files

We are legally obliged to delete CCTV recordings once we no longer require them. If you know when this is likely to be, set up a reminder to ensure that you delete the file once the time comes. Please also review other CCTV files regularly and delete any that are no longer needed.