

# CODE OF PRACTICE

## FOR THE OPERATION OF PUBLIC SPACE CLOSED CIRCUIT TELEVISION

*Tendring*  
District Council



ADOPTED 23<sup>RD</sup> APRIL 2021



# VERSION CONTROL

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# FORWARD

As we go about our daily lives, moving around our towns and cities, visiting shops and offices, travelling on public transport or simply driving on our roads, we all know that CCTV cameras are there.

Tendring District Council (TDC) believes that the use of CCTV continues to enjoy public support as it promotes a reduction in the fear of crime and provides reassurance, allowing our residents and visitors to feel safe as they go about their business within the district. But with this reassurance comes an intrusion into our lives.

In order to keep that intrusion to a minimum and to maintain public trust and confidence in its use and ensure safeguards are in place TDC has adopted this Code of Practice. It also means everyone knows TDC's role in CCTV.

*Ellr Paul Honeywood* – Portfolio Holder for Housing



# DEFINITIONS

In this Code of Practice the following definitions are used:

BWC.....	Body Worn Cameras. Cameras worn by certain staff to capture images on as and when required. Also known as Body Camera or Body Cam.
CCTV.....	Closed Circuit Television.
Covert Surveillance.....	Means any use of surveillance cameras for which RIPA is required. For example, to obtain images as part of a specific investigation in exceptional and justifiable circumstances.
DPA.....	The Data Protection Act 2018.
DPIA.....	Data Protection Impact Assessment
DVR.....	Digital Video Recorder
FOI.....	The Freedom of Information Act 2000.
GDPR.....	General Data Protection Regulation (EU legislation)
HRA.....	The Human Rights Act 1998.
ICO.....	Information Commissioner's Office
LED.....	Law Enforcement Directive (EU legislation)

# DEFINITIONS

Overt Surveillance	Means any use of surveillance cameras for which authority does not fall under RIPA.
POFA	The Protection of Freedoms Act 2012.
PTZ	Cameras that have the ability to be move their direction of view and can pan, tilt, and zoom.
Public Place	Is taken to mean any highway and any place that the public has access to, as a right or with permission.
RDC	Rapid Deployment Cameras
RIPA	The Regulation of Investigatory Powers Act 2000.
SIA	Security Industry Authority
SPoC	Single Point of Contact for day-to-day operations.
SRO	Senior Responsible Officer. Has overall responsibility for the CCTV system and service.
Stand-alone System	Means a CCTV system that is not connected to the wider Council network or controlled through the main CCTV Control Room.
Surveillance Camera System	Is taken to include (a) CCTV systems; (b) any other system for recording or viewing images; (c) any system for storing, receiving, transmitting, processing or checking images or information obtained by systems.
SUSA	Small Unmanned Surveillance Aircraft
System Operator	The person(s) who take the decision to deploy a surveillance camera system; are responsible for defining its purpose; are responsible for the control of its use or processing images or other information obtained via the system.
System User	This is a Tendring District Council employee that has access to the live or recorded images or other information obtained from the systems.

# 1. INTRODUCTION

## 1.1 GENERAL BACKGROUND

Changes in legal and technological developments mean that CCTV is no longer only a camera on a pole recording town centre images. Today you can see CCTV systems driven by computers using artificial intelligence to automatically surveil for car registration plates or capture facial image. Sophisticated digital systems are increasingly also becoming more portable. For instance, where appropriate, some services within Tendring District Council may use body worn cameras. Modern systems are no longer passive technology that only records and retains images used to keep people safe, but are now used proactively to identify people and keep detailed records of activities. The Council recognises that this use of cameras for surveillance can cause the public concern and takes steps to ensure that the use for surveillance is appropriate and legal.

## 1.2 PURPOSE OF THIS CODE OF PRACTICE

This Code of Practice uses the term “CCTV” to refer to all forms of surveillance camera systems as this is the term most widely known by the public.

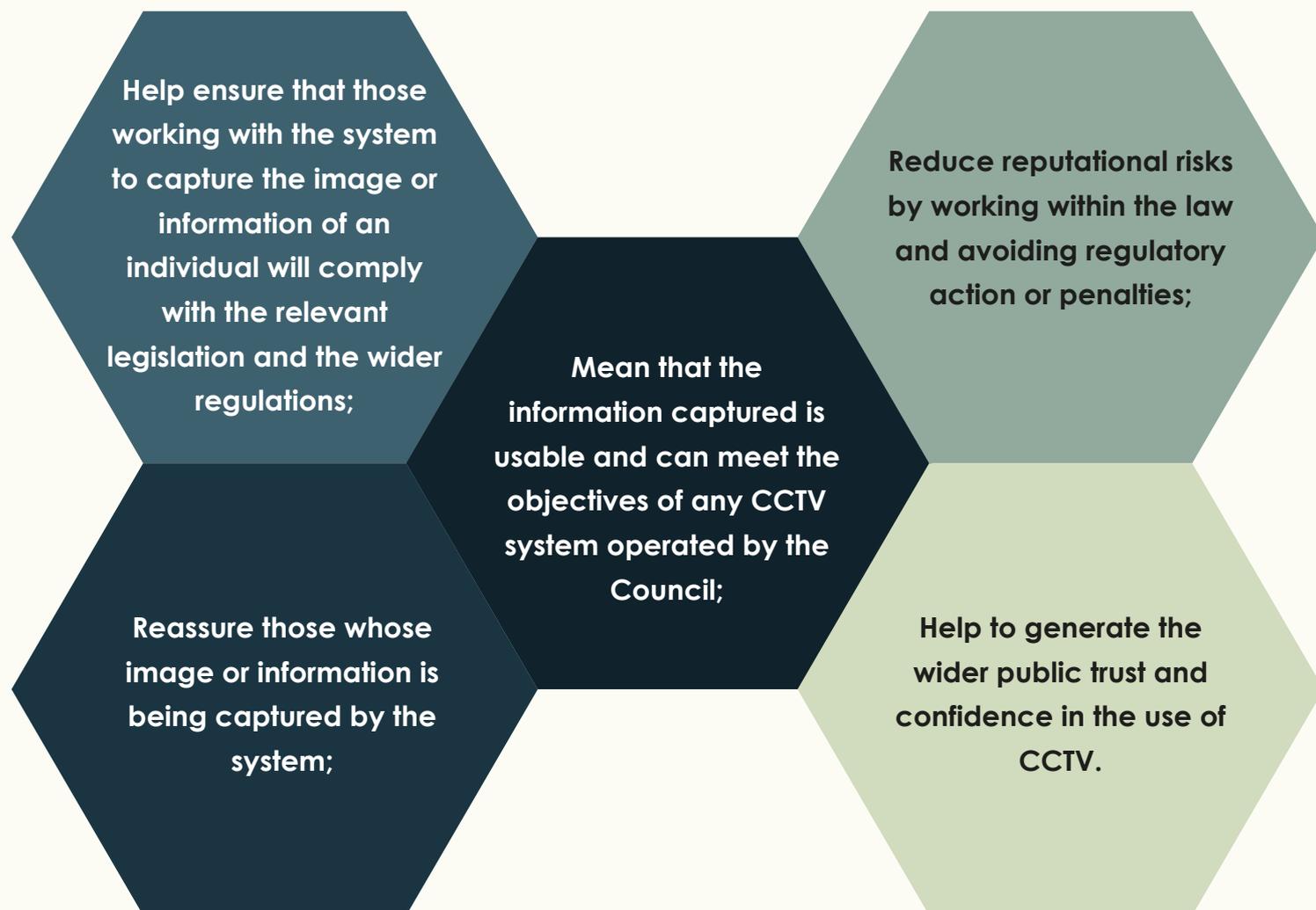
The Council is committed to upholding the principles of the Data Protection Act 2018 (DPA), the General Data Protection Regulation (GDPR), the Law Enforcement Directive (LED) and all relevant legislation and regulations to ensure that the use of its CCTV systems does not unjustifiably infringe the rights of individuals. With this in mind, the Council has issued this overarching Camera Code of Practice.

The objective of this Code of Practice is to help ensure good practice standards are adopted by Tendring District Council for its CCTV Systems. It provides good practice advice for the Council's operation of CCTV and other devices which record or provide viewing of images of individuals, and is designed to give a general overview of relevant policies and statements.

The images or information of individuals captured by CCTV is covered by the DPA and GDPR, and the guidance contained in this Code of Practice will help those involved with CCTV and its operation, to comply with their legal obligations under these laws. It will also help compliance with the wider legislative and regulatory environment, including the organisational obligations under the Freedom of Information Act 2000 (FOI), the Human Rights Act 1998 (HRA), the Protection of Freedoms Act 2012 (POFA), and the use of the CCTV system for surveillance.

To that end, this Code of Practice has been based on the legally enforceable data protection principles outlined in Appendix 1, and has been set out to follow the lifecycle and practical operation of the CCTV system.

By following this Code of Practice, Tendring District Council will:



### **1.3 SCOPE OF THIS CODE OF PRACTICE**

This Code of Practice covers the use of Town Centre and District CCTV by Tendring District Council together with any other council owned systems that capture images of individuals, or information that could lead to the identification of an individual on the following camera related surveillance equipment including (but not an exhaustive list):

- Town Centre and District System;
- Body Worn Cameras (BWC);
- Stand-alone systems in Council offices or at council assets such as Civic Buildings or Car Parks;
- Rapid Deployment Cameras (RDC)
- Drones

This Code of Practice also covers the use of images or information captured by the Tendring District CCTV systems when they are provided to the media.

## 1.4 KEY PERSONNAL

The Head of Customer and Commercial Services is designated the Senior Responsible Officer (SRO) on behalf of the system owners. His/her role will include a responsibility to:

**Ensure the provision and maintenance of all equipment forming part of the Tendring District Council System in accordance with contractual arrangements which the owners may from time to time enter into.**

**Maintain close liaison with the Control Centre Service Development Manager - Single Point of Contact (SPOC).**

**Ensure the interests of the system owners and other organisations are upheld in accordance with the terms of this Code of Practice.**

**Agree to any proposed alterations and additions to the system, this Code of Practice and / or the CCTV Procedures Manual.**

**Ensure the SRO and SPOC maintain current and valid Security Industry Authority (SIA) CCTV Licences.**

The Control Centre Service Development Manager is designated as Single Point of Contact (SPOC) for all day-to-day operations.

Their role includes the responsibility to:

- Maintain day to day management of the system and liaises with CCTV staff managers;
- Ensure that this Code of Practice is complied with;
- Maintain direct liaison with the owners of the system.
- Maintain direct liaison with partners i.e. Essex Police

## 1.5 CONTACT DETAILS FOR SYSTEM OWNERS

Tendring District Council  
Barnes House  
92 Pier Avenue  
Clacton on Sea  
Essex  
CO15 1NJ

Tel: 01255 423 360  
Email: [cctvcontrol@tendringdc.gov.uk](mailto:cctvcontrol@tendringdc.gov.uk)

## 1.6 ACKNOWLEDGEMENT

Tendring District Council wishes to acknowledge the Information Commissioner's CCTV Code of Practice, and the Home Office Surveillance Camera Code of Practice which have been referred to in the development of this Code of Practice.

# 2. TENDRING DISTRICT COUNCIL CCTV

## 2.1 STATEMENT OF PURPOSE

The overarching purpose of the Camera systems operated by Tendring District Council is to assist with making Tendring a safe environment for its residents, visitors and the business community.

The following are the purposes that Tendring District Council has identified for the operation of the different types of CCTV:

- A reduction in the fear of crime and violence, and provide reassurance to the public;
- To support public safety and help secure safer areas in which to work, live, shop and play;
- To assure visitors to Tendring that the town centres, car parks and other areas covered by CCTV cameras provide a safe and secure area to visit;
- To support the safe working environment for Council employees and the Council's elected members;
- To deter, prevent, detect, and investigate crime in the areas covered by CCTV cameras including:
  - providing assistance in the prevention of crime
  - deterring and detecting crime
  - helping to identify, apprehend and prosecute offenders
  - providing the Police and the Council with evidence to take criminal and civil action in the Courts
  - the maintenance of public order
  - control of begging, vandalism and antisocial behaviour
  - crowd control and disorder where appropriate;
  - To assist with town centre management;
- To support the economic well-being of Tendring;
- Surveillance where this is authorised and appropriate;
- To assist in detecting acts of terrorism in Tendring;
- To support national security;
- To assist the Police and Civil Authorities in the event of a major civil emergency in the area covered by the system.

## 2.2 KEY OBJECTIVES

Key objectives of CCTV are:

- To improve the perception of the public in respect of the safety of Tendring;
- To help reduce the amount of crime, including vehicle crime and shoplifting;
- To help reduce the number and type of antisocial street activities, e.g. fly tipping, begging, illegal street trading, vandalism, drunken behaviour;
- To support a better detection of crime in areas covered by CCTV cameras and provide evidential material for any subsequent prosecution in court;
- To assist the Council in its enforcement and regulatory functions within Tendring;
- To improve general security within Council, both in terms of personal security and security of the buildings and assets;
- To improve general security with the district, both in terms of personal security and security of buildings and premises;
- To assist in making the district a more attractive place in which to work, shop and play;
- To assist with visitor economy e.g. lost children, the management of major events held within Tendring;
- To maintain the basic fundamentals of an individual's right to privacy, dress and reasonable behaviour.

## 2.3 CAMERAS AND AREA COVERED

The areas covered by CCTV to which this Code of Practice primarily refers, are generally the main town centre areas and transport interchanges. This may change over time (see section 3 of this Code of Practice).

A full list of fixed permanent cameras can be found in Appendix 3.

## 2.4 TEDNRING DISTRICT COUNCIL - DATA PROTECTION REGISTRATION

Tendring District Council is obliged to comply with the General Data Protection Regulation and Data Protection Act 2018, and is registered with the Information Commissioner's Office as it handles personal data, including images and information captured by CCTV.

The registration number is



**Z577148X**

### 3. DECIDING WHEN SURVEILLANCE CAMERA SYSTEMS SHOULD BE USED

Tendring District Council is aware that using CCTV has the potential to be intrusive on an individual's privacy and therefore we carefully consider the use of the different types of systems available before deploying or using these.

We recognise that the use of CCTV is a valuable tool in the management of public safety and security, in the protection of people and property, in the prevention and investigation of crime, and in bringing crimes to justice.

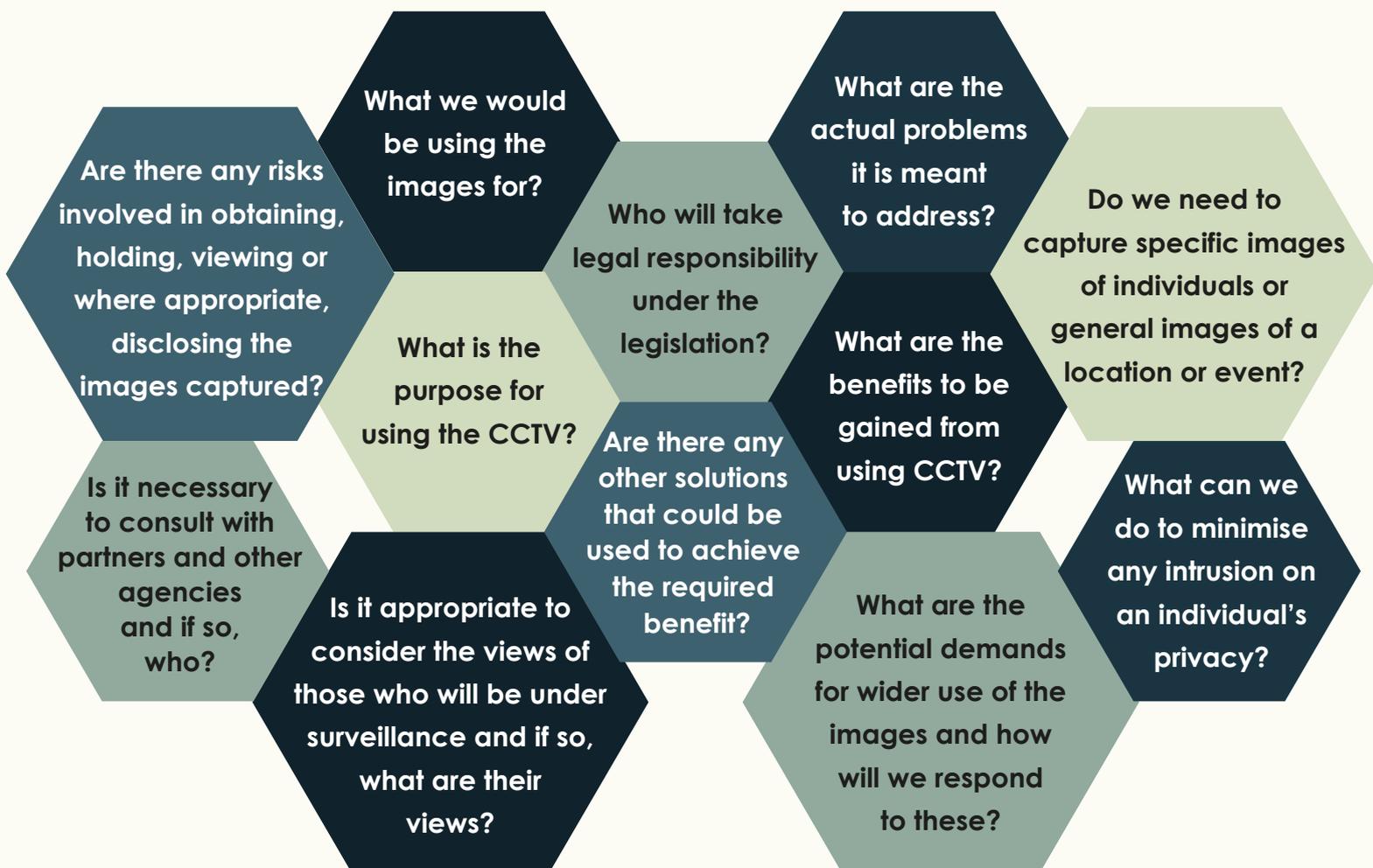
Just because it is possible, affordable or there is public support, these are not the only justifications for capturing images. These images are classed as personal data, and there are obligations for processing such personal data. We will take into account the nature of the problem we are trying to address, the effect it will have on individuals and, whether it is a justified and proportionate response. There are sometimes alternatives which can be used.

For example, cars in a car park are often damaged and broken in to at night. We could consider whether improved lighting would reduce the problem more effectively than CCTV.

The Council will consider the expectations of individuals which will vary for different locations. For example, in a town centre, there is generally an expectation that CCTV will be in use, whilst in a Council office individuals may have an expectation that CCTV will be in use within the reception area only. We need to consider what is necessary and what safeguards we can put in place.

To assist our decision making processes, we will undertake an assessment of the relevant CCTV on an individual's privacy through a Data Protection Impact Assessment (DPIA). This assessment enables us to consider the wider context as well as the legislation, and whether the CCTV impacts on fairness under the first data protection principle.

To summarise, the type of questions that the Council will cover in the Data Protection Impact Assessment are:



Once CCTV is in use, we will regularly evaluate the continuing use of the particular system to determine if it is still necessary.

To ensure that the system is established on a proper legal basis and operated in accordance with the law, the Council will adhere to the data protection principles (Appendix 1), and will adopt the guiding principles contained within the Home Office's Surveillance Camera Code of Practice (Appendix 2). To show how the Council and the CCTV systems adhere to these guiding principles we have completed the Surveillance Camera Commissioner's Self-Assessment Tool which is published on the council website.

# 4. GOVERNANCE

## 4.1 ENSURING EFFECTIVE ADMINISTRATION

Tendring District Council is committed to establishing a clear basis for handling images and information obtained from CCTV. The Council is the System Operator and 'owner' for CCTV, and is the data controller as defined in the DPA and GDPR. We have the responsibility for making decisions and are legally responsible for compliance with the DPA and GDPR.

We will detail who has the day-to-day responsibility for the control of the images recorded from all CCTV, including deciding what is recorded, how it should be used and who can have access to this (directly or via a disclosure).

For some of the CCTV, more than one organisation will be involved; for example, the Council may provide a 'live feed' to the Essex Police Control Room, particularly when this relates to an ongoing incident.

As we are the CCTV 'owner' (and System Operator), where there is more than one organisation involved, as for the Town Centre CCTV, the Council will ensure that we all know our responsibilities and obligations, and will:

- Determine who has responsibility for the control of the images and making the decisions on how they can be used once 'shared';
- Ensure that anyone they agree to regularly share the images with for a legitimate purpose is registered with the Information Commissioner's Office;
- Enter into a suitable written agreement or contract that defines how information will be transferred, includes guarantees about storage and security of the images and all staff are properly trained.

If the Council enters into a contract with another organisation or company to assist with processing the images, for example, if they need to be edited or blurred before disclosure, this contract will include specific instructions on the processing, define responsibilities, require audits or inspections to ensure compliance, and detail an appropriately named individual for the contract.

## 4.2 DEFINING OUR PROCEDURES

The Council will define clear procedures to assist in the use of CCTV on a day-to-day basis. For each different type of CCTV in use, we will define specific procedures and these will be appended to this Code of Practice or published on our website. These will be reviewed regularly to ensure that they meet the following:

- There are clearly defined and specified purposes for the capture and use of the images and information, and these have been communicated to the System Users;
- There are documented procedures for how the images and information should be handled;
- They include guidance on disclosures and how to keep suitable records, as well as ensuring that the disclosure is made to an appropriate person;
- There is a named Council employed individual responsible for ensuring that the standards set for compliance with this Code of Practice and legal obligations, as well as the defined and documented procedures, are followed by all;
- They include a requirement to undertake regular checks and audits, and these checks and audits are recorded.

We will ensure that we take into account any other regulatory guidance or rules, particularly those issued by the Information Commissioner's Office (ICO) or the Surveillance Camera Commissioner's Office.

## 4.3 LOOKING AFTER THE RECORDED IMAGES AND INFORMATION, AND USING THEM

### 4.3.1 STORING OF CCTV INFORMATION

Tendring District Council will store any images captured in a way that maintains the integrity of this information and in line with nationally recognised standards.

Nowadays, the storage is digital, and is held on secure DVRs (Digital Video Recorders) and secure electronic storage devices. Where it is technically possible, these are encrypted. These storage devices are located within Council buildings or assets with restricted access to both the physical building and the storage device. The Council takes all reasonable steps to prevent unauthorised access to images and information.

As the Council's CCTV includes different types of equipment, including mobile devices, we are required to download and store images captured by these devices. When the images are downloaded from such devices, they are stored on encrypted electronic storage.

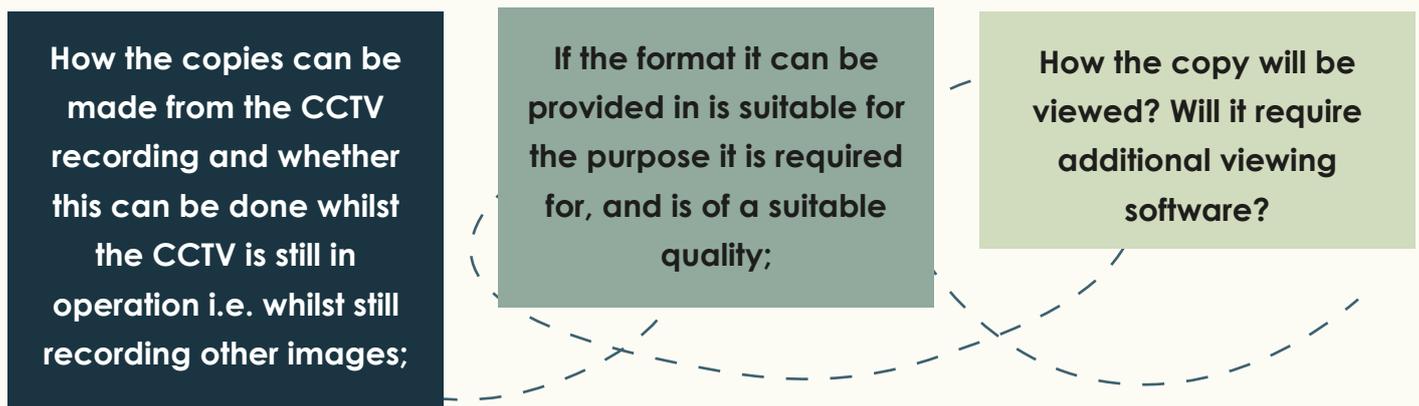
## 4.3.2 RETENTION

Generally, the Council will retain CCTV images and information for one month from the date it was captured, unless it is required for evidence. Where this differs due to the nature of the type of CCTV, we will specify this in the individual procedures. For all types of CCTV, once this retention period has passed, it will be deleted, either automatically via appropriate settings on the CCTV system, or manually where automation is not possible.

## 4.3.3 VIEWING CCTV INFORMATION

Unlike previous CCTV which recorded to video tapes which could be easily provided to law enforcement agencies or others, the modern CCTV relies on digital recording. Therefore, when images are required for evidentiary or law enforcement purposes, there will be agreed procedures for provision of these (usually by DVD, USB device or hard drive, or secure transfer) and an audit trail will be maintained.

When agreeing the procedures, the Council will consider:



General operational viewing of the images and information, i.e. live or real-time viewing, will be managed securely within the council buildings or assets, and will require dedicated software to facilitate viewing directly from the system. It will be restricted to the System Users and where appropriate, other authorised persons. Any persons permitted to view CCTV footage will have signed a Declaration Of Confidentiality (appendix 4.)

Viewing monitors will not be placed in locations which can be viewed by the public.

Where CCTV is in operation in areas where there is a higher expectation of privacy, the viewing will be restricted to the System Users or authorised persons such as the Police. Where there is the additional factor of CCTV being located in an area that is particularly sensitive, live or real-time viewing will not be standard. In these circumstances, the Council considers that viewing after an incident has occurred will be more appropriate.

## 4.3.4 DISCLOSURE

Disclosure of information from the Council's CCTV will be controlled and in line with the purposes that we have specified for its use.

For example, where we have implemented a CCTV system to help prevent and detect crime, it will be appropriate to disclose images and information to law enforcement agencies such as the Police, but it will not be appropriate for use to disclose the images to the media for entertainment purposes, or to upload these to the internet for entertainment.

That being said, even if we have implemented CCTV for other purposes, it may still be appropriate to disclose images to law enforcement agencies or the Police if failure in disclosing the images would be likely to prejudice the actions of such agencies to prevent or detect crime.

We will work with the media on disclosing images or information where it is necessary to aid identification of individuals, particularly for the detection of crime, but we will only do this in conjunction with the Police.

We will consider any other requests for disclosure of images or information with care as it may be unfair to individuals to disclose their images. Where their images may have to be released to a 'third party' we will consider if the disclosure to this third party outweighs protecting the individual.

Any judgement about disclosure will be made by Tendring District Council as the data controller for CCTV. We do have the discretion to refuse requests unless there is an obligation to disclose in law through information access rights such as Subject Access Rights [see 4.3.5] or Freedom of Information [see 4.3.6], or following a court order.

Once we have disclosed images or information to another, such as the Police, they will become the data controller for their copy. It is then their responsibility to comply with all relevant legislation to keep this copy safe and secure.

## 4.3.5 SUBJECT ACCESS REQUESTS

Individuals whose images and information are recorded by CCTV have a right under the DPA and GDPR, to be provided with a copy of this. This is known as a Right of Access or, more commonly a Subject Access Request (SAR).

The Council must provide the information promptly and within a maximum of 1 month from the date of receipt of the request. We will endeavour to respond promptly, and if the information would be routinely deleted during the maximum 1 month period, we will take steps to secure the information to ensure it is not deleted whilst we are processing the request. If the request is deemed to be complex, we will inform the applicant and may extend the timescale up to an additional 2 months.

The Council has published information on Subject Access Requests on its website <https://www.tendringdc.gov.uk/council/your-right-know/data-protection-privacy-notice-and-cookies>. Irrespective of how the request is submitted, it does require assistance from the individual making the request as they will need to provide sufficient information to be able to identify them, together with information on date and time to narrow the search. We will usually restrict any search to the specific times provided, however we will not undertake a search for any period longer than 2 hours. We will also require proof of identity and address.

If the personal images or information requested includes another individual (a third party), we will consider whether we need to edit or blur (obscure) the third party images, especially if they appear to intrude on their privacy or is likely to cause unwarranted harm or distress. Examples where editing may or may not apply are:

People entering an office or reception are more likely to have a higher expectation of privacy and confidentiality and the images of another third party will need to be edited or blurred before disclosure.

The images of a group of friends waving at a town centre camera can be released to one of the group if they request this, without editing or blurring their friend's images as they have a lower expectation of privacy. The reason is that their actions indicate that they knew the camera was there and they are in a public space.

In summary, the Council will ensure that all Subject Access Requests are handled in line with its own procedures and that these comply with the legislation.

## 4.3.6 FREEDOM OF INFORMATION REQUESTS

As a public authority, Tendring District Council is required to comply with requests for information submitted under the Freedom of Information Act (FOI).

We have members of staff trained to handle and respond to FOI requests who understand the Council's responsibilities to respond within the legislated timescale of 20 working days from receipt of the request. For the CCTV Service, the majority of FOI requests are for an individual's image captured by the CCTV System. These can fall into two categories and are considered in conjunction with Section 40 of the FOI:

If the images or information is the personal data of the person making the request, then it is exempt from FOI and will be treated as a Subject Access Request;

If the images or information are personal data of another person, a third party, then this will only be disclosed if this would not breach the data protection principles.

In these instances, the Council will consider if disclosure is appropriate but it is generally unlikely that others images will be disclosed as this would mean that the images could then be used for any purpose and this would be outside the registered purpose of the CCTV and the individual's expectations.

All other requests, for example, where a person asks about the costs of the CCTV or the operation of it, will be dealt with under FOI. Disclosure will be subject to any exemptions that may apply. Individuals whose images and personal information are recorded by CCTV have rights under data protection law. These include the Right of Access or Subject Access Request (SAR). This provides an individual with the right to request and obtain confirmation from the Council as to whether or not their personal information are being processed in any way and, if so, to have access to their own personal information. The Council must also provide the requestor with a range of other information. These Rights are all clearly set out in the Council's Data Protection Privacy Notice which is published on its website <https://www.tendringdc.gov.uk/privacy> and on request at its public reception areas throughout the District. R).

The Council must provide the information free of charge, without undue delay and within 1 calendar month from the date of receipt of the request, or following receipt of any clarification or proof of identity has been received. We will endeavour to respond promptly, and if the information would be routinely deleted during the 1 month period, we will take steps to secure the information to ensure it is not deleted whilst we are processing the request. If the request is deemed to be complex, we will inform the applicant at the time of their request and are able to extend the timescale up to an additional 2 months if required.

### 4.3.7 RIPA REQUESTS

From time to time, the council will receive a request that has been authorised under the Regulation of Investigatory Powers Act (RIPA). These requests will specify circumstances and locations for a camera to be positioned to capture images or information, and may be covert.

We will ensure that any such request is in writing and has the appropriate level of authority for the specified recording and subsequent disclosure. An audit record of all such requests will be maintained.

### 4.3.8 COMPLAINTS

Any complaints will be handled in accordance with the Council's Complaints Procedure which can be found online at <https://www.tendringdc.gov.uk/council/consultation-contact-and-complaints/how-complain>

In the first instance any complaint should be submitted in writing to:

The Control Centre Service Development Manager

Tendring District Council

Barnes House

92 Pie Avenue

Clacton-on-Sea

CO15 1NJ

or by email to: [cellington@tendringdc.gov.uk](mailto:cellington@tendringdc.gov.uk)

## 4.4 STAYING IN CONTROL

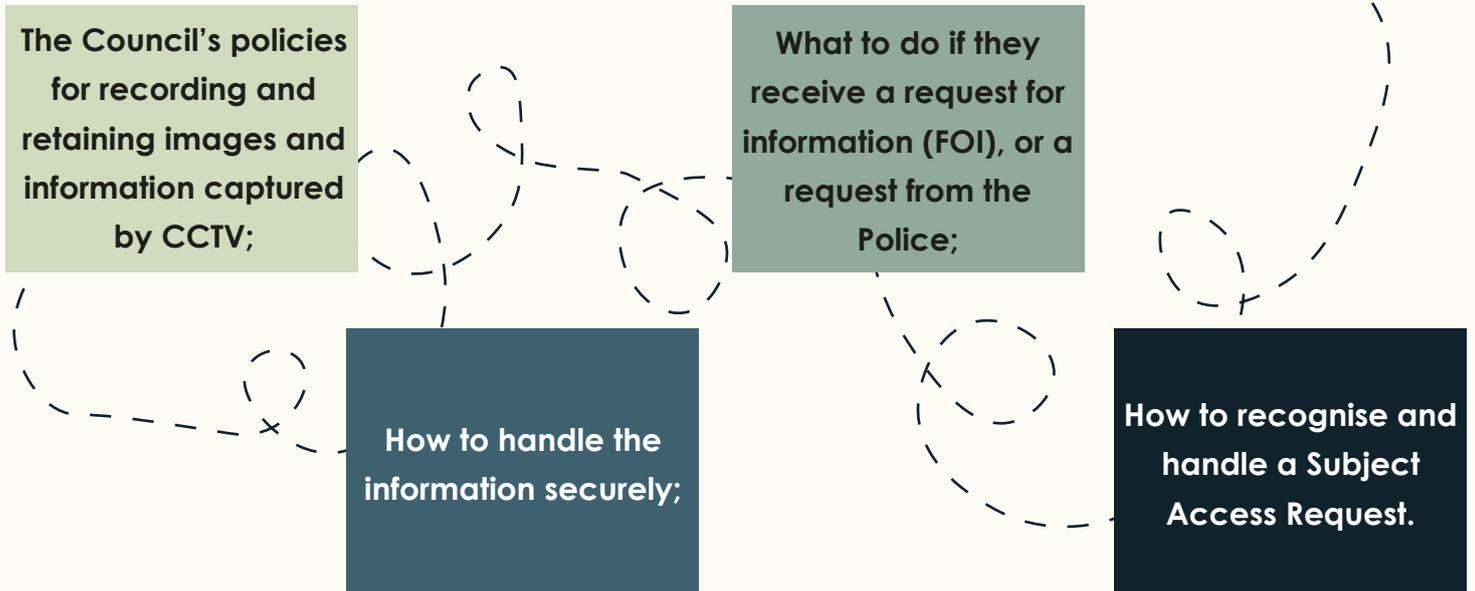
To ensure compliance with legislation and the requirements of the both the ICO's CCTV Code of Practice and Home Office's Surveillance Camera Code of Practice, Tendring District Council will:

**Tell people how they can make a subject access request;**

**Make this Code of Practice available to the public;**

**Tell them how to complain about the operation of CCTV.**

Employees and system users that use and operate the CCTV will be trained to ensure they comply with this Code of Practice. They will know:



We will ensure that images and information will be protected, including technical, organisational and physical security measures to assist with this. Such measures include:

- Protect any wireless transmissions to safeguard it from interception;
- Apply software updates to the CCTV when necessary;
- Restrict who can make copies of information;
- Ensure that the deletion process is effective and adhered to;
- Secure the control room and the facilities where the information is stored digitally;
- Train those using the CCTV in security procedures and sanction those who misuse the CCTV;
- Ensure those using and operating CCTV are aware that they could be committing a criminal offence if they misuse the CCTV.

There will be a regular review of procedures and processes to maintain the defined standards. There will also be regular reviews of the various CCTV systems which will assist the Council's compliance with legislation.

## 5. SELECTING AND SITING CAMERAS

The CCTV implemented by Tendring District Council will be approved to meet the purpose for which it is being used. Consequently, the images or information captured will be adequate for the purposes specified.

Where CCTV is permanently installed, such as the Town and District CCTV, this will be in all-weather domes or cases and will not be installed in a covert manner.

In selecting CCTV equipment we will use that which is most appropriate for the situation. Many cameras now record in full colour and some can automatically switch to monochrome in low light conditions. For the Town Centre and District CCTV, we will use both fixed cameras and those that have pan, tilt and zoom facilities (PTZ).

The locations in Tendring District for the placement of permanent camera equipment, or for RDCs, will be chosen to achieve the purpose, and restrict the capture of images of areas that are not of interest or intended to be the subject of the surveillance.

For areas where there is a greater expectation of privacy, for example, in changing rooms, we will only temporarily use cameras in exceptional circumstances where it is necessary to deal with the most serious concerns. Without prejudicing any investigations, we will make every effort to make individual's aware that they are being recorded, and ensure that appropriate restrictions are in place.

We will refer to the guiding principles within the Code of Practice for POFA (principle 8) where this relates to identifying the requirements of a surveillance camera system.



To summarise, the Council will consider the following to make informed decisions:

- What are the technical specifications and the technologies available to ensure that the images captured are of an appropriate quality?
- Is the camera suitable for the location, considering the light levels and size of area to be viewed?
- Will the camera be sited in a way that ensures it is secure and protected from vandalism?
- Will the view of the camera be obscured by buildings or growth of plants and trees, or similar?
- Where appropriate, will the camera be sited to ensure that the viewing space it records is limited to the purpose (the need)?
- When the camera is installed to deal with a specific problem, is it possible, or suitable to have a CCTV system that only records on movement or at certain times?
- Does the CCTV System chosen produce images that are of sufficient size, resolutions and frames per second?

## 6. OTHER TECHNOLOGIES

There are a number of other CCTV technologies that have been developed more recently and the way in which these can be linked or matched together means that CCTV is becoming more connected. This presents further issues for the operation of these types of CCTV and the handling the personal data of individuals.

### 6.1 BODY WORN CAMERA (BWC)

BWC is the use of a camera that can be worn by a council employee, usually attached to their uniform clothing. These small cameras can record both sound and video.

The Council recognises that BWC is likely to be more intrusive than more traditional CCTV and we will ensure that consideration is given to the impact on privacy before deploying these.

Currently Tendring District Council is not using BWC in any of its services but reserves the right to introduce this type of recording device if it is felt necessary to either protect our staff or for evidential purposes. The use of BWC would only be permitted after regard to this Code of Practice and the Surveillance Camera Commissioner's 12 Guiding Principles (see appendix 2).

## 6.2 STAND-ALONE CCTV

Tendring District Council uses CCTV within its own offices and assets such as the Town Hall, Northbourne Depot, or Sheltered Housing schemes.

Some of these are connected to the main CCTV Control Room and images or information is recorded on the main DVRs. However, a number of these are stand-alone CCTV systems. This means that the recordings are held within the particular office or asset and can only be accessed by authorised Council employees trained to operate that system.

Where we use stand-alone CCTV, we avoid continual monitoring of the images as far as possible. We will access the recordings to view and provide copies of the images and information when this is necessary and in line with legislation.

## 6.3 RAPID DEPLOYMENT CAMERAS (RDC)

RDC can be moved to agreed sites following identification of an increase in incidents in that specific locality.

To ensure that the deployment of the RDC complies with legislation, checklists will be followed and these form part of the documentation that will be maintained to form an audit record.

Deployment of the RDC will be carried out by the Council's appointed Installation and Maintenance Contractor who will comply with all relevant safety procedures, will wear appropriate protective equipment, and clothing that clearly identifies the company they are employed by.

## 6.4 DRONES

Tendring District Council has introduced drone (SUSA) technology to enhance aerial footage for both promotional and communication purposes. The Council will not use a drone for any surveillance footage.

The use of drones is covered by a bespoke Drone Policy which can be found on the Council's website [www.tendringdc.gov.uk](http://www.tendringdc.gov.uk)

## 7. USING THE EQUIPMENT

Tendring District Council recognises that it is important that any CCTV produces information that is of a suitable quality to meet the purpose that it was installed for. The Surveillance Camera Commissioner is responsible for providing advice on recommended operational, technical and occupational standards and the Council has taken this into account.

When using CCTV, will we ask:

- If the CCTV produces clear, quality information that is maintained throughout the recording process;
- Whether we need to compress the recorded material and if so, determine if this will result in a lower picture quality;
- If we have set up the recording systems in a way that prevent inadvertent corruption;
- If we regularly check the date and time stamp on recorded images to ensure it is accurate;
- What the maintenance regime should be and if it is sufficient to maintain high quality information;
- If any wireless transmissions we use are secure and if we have the ability to encrypt the information;

Although our main CCTV will not normally record conversations, the Council can mitigate any intrusion on privacy. Where we have identified a need for recording conversations, we will follow the guidance in the ICO Code of Practice and that included in the Surveillance Camera Commissioner's standards to avoid a breach of the relevant data protection legislation and Article 8 of the European Convention on Human Rights and the associated HRA (the right to family and private life).

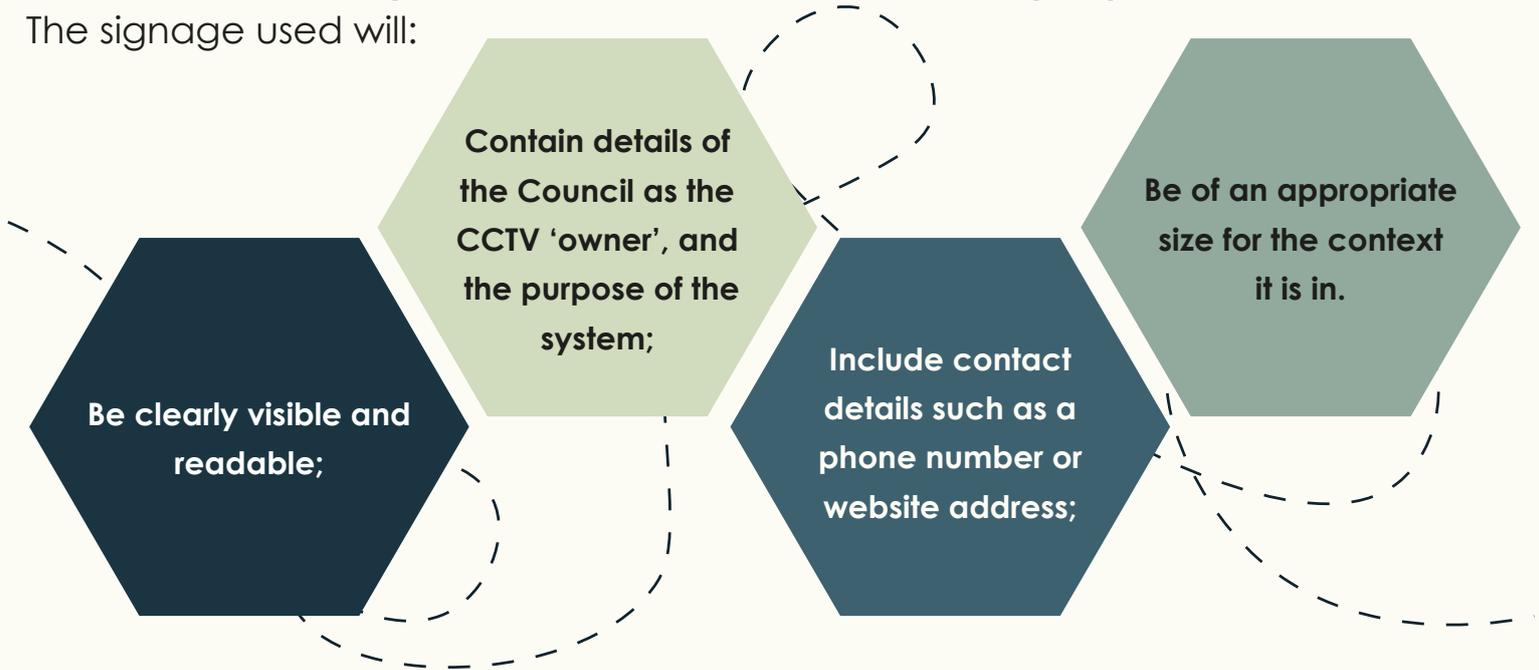
Some CCTV has the ability to broadcast messages. We will only use this type of CCTV if the proposed messages directly relate to the purpose of the system

# 8. RESPONSIBILITIES

## 8.1 LETTING OTHERS KNOW

We will let people know that we are operating CCTV by placing signs in the areas where this is in place. For the Town Centre and District system, we will place clear and prominent signage on street furniture such as lampposts or walls.

Where CCTV is in use in areas where there is a higher expectation of privacy, such as a Council building or facility, we will ensure there is signage at the entry points. The signage used will:



## 8.2 OTHER RESPONSIBILITIES

The Council acknowledges that there are further key rights that individuals have under data protection legislation (DPA and GDPR) which the Council will make the System Users aware of.

These are:

The right to prevent processing likely to cause substantial and unwarranted distress;

The right to prevent automated decision-taking in relation to an individual.

If an individual exercises these rights, the Council's Information Governance Team will advise on how to process the requests.

If we are required to use contractors at any time we will ensure that they hold a public space surveillance (CCTV) licence to ensure compliance with the Private Security Industry Act 2001 and the Security Industry Authority (SIA).

# APPENDIX 1

## The General Data Protection regulation: data protection principles (Article 5)

System Operators should adopt the following principles:

1. Personal data shall be:

(a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');

(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall [...] not be considered to be incompatible with the initial purposes ('purpose limitation');

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes [...] subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

2. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').

# APPENDIX 2

## The guiding principles of the Surveillance Camera Code of Practice

System Operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.

12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.



# APPENDIX 3

## CAMERA LOCATIONS

Location (Street, Car Park)	Activity (need)	Purpose of observation	Target Speed
<b>Clacton Town Centre</b>			
Wagstaffs Corner, 37 Station Road Clacton-on-Sea, CO15 1TD	Public Safety, Shoplifting	Monitoring a large area	Variable
Christmas Tree Island, CO15 1FB	Public Safety, Shoplifting, Antisocial Behaviour	Monitoring a large area	Variable
Edinburgh Woollen Mill, 68-70 Pier Avenue, Clacton-on-Sea, Essex CO15 1NH	Public Safety, Shoplifting	Monitoring a large area	Variable
QD, 72-76 Rosemary Road, Clacton-on-Sea CO15 1TZ	Public Safety, Shoplifting	Monitoring a large area	Variable
The Carlton, Rosemary Road, Clacton-on-Sea, CO15 1TE	Public Safety, Shoplifting	Monitoring a large area	Variable
Sainsbury's, 39 High Street, Clacton-on-Sea, Essex CO15 1NU	Public Safety, Shoplifting	Monitoring a large area	Variable
25 Carnarvon Road, CO15 6QF	Theft/Shoplifting, Antisocial Behaviour	Observe/Monitor	Variable
Rosemary Road/Orwell Road, 23 Rosemary Road, CO15 1PA	Theft/Shoplifting, Antisocial Behaviour	Observe/Monitor	Variable
Pallister Road, 19 Pallister Road, Clacton-on-Sea, Essex, CO15 1PQ	Theft/Shoplifting, Antisocial Behaviour	Observe/Monitor	Variable
2 Marine Parade West, CO15 1RH	Public Safety, Antisocial Behaviour	Observe/Monitor	Variable
Agate Road Car Park, Clacton on Sea, CO15 1RA	Public Safety, Antisocial Behaviour, Theft	Observe/Monitor	Variable

The Pier, Clacton on Sea, CO15 1RH	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Edith Road/Marine Parade West	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Tower Road/Marine Parade West	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Jackson Road, Clacton on Sea, CO15 1JP	Public Safety, Theft/ Shoplifting	Observe/Monitor	Variable
Town Hall, Clacton on Sea, CO15 1SE	Public Safety, Shoplifting	Observe/Monitor	Variable
Train Station, Clacton on Sea, CO15 6DE	Public Safety / Flow of Crowds	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park)Clacton on Sea CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park), Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park) Ground Floor 1, Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park) Ground Floor 2, Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park) Middle Floor 1, Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park) Middle Floor 2, Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Carnarvon Road (Multi Story Car Park) Middle Floor 3, Clacton on Sea, CO15 6QF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable

Wellesley Road Car Park, Clacton on Sea, CO15 3AA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Lidl, 3 St Osyth Road, Clacton on Sea, CO15 3BN	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
London Road Roundabout, Clacton on Sea, CO16 8DB	Public Safety / Flow of Traffic	Observe/Monitor	Variable
Elm Grove Car Park, Clacton on Sea, CO15 4DH	Theft / Vandalism	Observe/Monitor	Variable
56 North Road, Clacton on Sea, CO15 4DE	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Jaywick Sands			
The 3 Jays, 1 Marlow Road, Jaywick Clacton on Sea, CO15 2PJ	Public Safety / Flow of Traffic	Observe/Monitor	Variable
Dots of Jaywick, 8 Broadway, Jaywick, Clacton on Sea, CO15 2EB	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Sweet Tina's, 12-13 Tamarisk Way, Jaywick, Clacton on Sea, CO15 2HZ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Enterprise Centre, Lotus Way, Jaywick, Clacton on Sea, CO15 2LU	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre, Brooklands Gardens Jaywick, Clacton on Sea, CO15 2PJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Brooklands Gardens 1, Jaywick, Clacton on Sea, CO15 2PJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Brooklands Gardens 2, Jaywick, Clacton on Sea, CO15 2PJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable

Belsize Belsize Avenue, Jaywick, Clacton-on-Sea, CO15 2LF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Belsize Belsize Avenue, Jaywick, Clacton-on-Sea, CO15 2LF	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Rover Avenue 1, Jaywick, (Fixed), CO15 2LP	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Rover Avenue 1a, Jaywick, (PTZ), CO15 2LP	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Rover Avenue 2, Jaywick, (FIXED), CO15 2LP	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Lotus Way, Jaywick (PTZ), CO15 2LY	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Lotus Way, Jaywick (Fixed), CO15 2LY	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre, Brooklands Gardens, Jaywick, Clacton on Sea, CO15 2PJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre, Brooklands Gardens, Jaywick, Clacton on Sea, CO15 2PJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Wolseley Avenue 1, Jaywick, Clacton-on-Sea, Essex, CO15 2JH	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Wolseley Avenue 2, Jaywick, Clacton-on-Sea, Essex, CO15 2JH	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Tamarisk Way, Jaywick, Clacton-on-Sea, Essex, CO15 2HZ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable

Clacton (other)			
Wahoo, 2 Marine Parade West, Clacton-on-Sea CO15 1RH	Public Safety, Antisocial Behaviour.	Identify and Recognise	Stationary / walking
Barnes House - Front Door, Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Security of unauthorised entry	Identify and Recognise	Stationary
Front of Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Identify and Recognise	Variable
Generator - Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Security of unauthorised entry	Observe/Monitor	Stationary / walking
Rear Gate - Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Security of unauthorised entry	Observe/Monitor	Stationary / walking
Rear side Fire Exit - Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Security of unauthorised entry	Observe/Monitor	Stationary / walking
Foot Path - Barnes House, 92 Pier Avenue, Clacton on Sea, CO15 1NJ	Security of unauthorised entry	Observe/Monitor	Stationary / walking
Percy King Estate			
Coppins Hall - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Coppins Hall Play Area - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary / walking
Nayland Front Drive - Clacton-on-Sea, Essex CO16 8TJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Nayland Rear Drive - Clacton-on-Sea, Essex, CO16 8TJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable

Nayland Drive Column - Clacton-on-Sea, Essex, CO16 8TJ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Langham Rear -, Langham Drive, CO16 7AQ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Langham Front - Langham Drive, CO16 7AQ	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Boxted Avenue - Clacton-on-Sea, Essex CO16 7AE	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre 1 - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre 2 - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre 3 - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
Community Centre 4 - Maldon Way, Clacton-on-Sea, Essex, CO16 7PA	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Variable
<b>Housing related</b>			
Churchill Court, Dovercourt, Harwich, CO12 4NU	Public Safety, Antisocial Behaviour,	Observe/Monitor	Variable
Churchill Court, Dovercourt, Harwich, CO12 4NU	Public Safety, Antisocial Behaviour,	Observe/Monitor	Variable
Churchill Court, Dovercourt, Harwich, CO12 4NU	Public Safety, Antisocial Behaviour,	Observe/Monitor	Variable
Churchill Court, Dovercourt, Harwich, CO12 4NU	Public Safety, Antisocial Behaviour,	Observe/Monitor	Variable

Churchill Court, Dovercourt, Harwich, CO12 4NU	Public Safety, Antisocial Behaviour,	Observe/Monitor	Variable
Sheltered Housing			
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Crooked Elms, Off Maple Close, Dovercourt, Harwich, CO12 4AL	Public Safety	Observe/Monitor	
Kate Daniels Hilltop Crescent, Weeley, CO16 9HE - Main Door	Public Safety	Recognise	Stationary
Kate Daniels Hilltop Crescent, Weeley, CO16 9HE Car Park/Entrance	Public Safety	Observe/Monitor	Variable
Kate Daniels Hilltop Crescent, Weeley, CO16 9HE Rear	Public Safety	Observe/Monitor	Variable
Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Gardens	Public Safety	Observe/Monitor	Variable
Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Car Park	Public Safety	Observe/Monitor	Variable
Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Main Door	Public Safety	Recognise	Stationary

Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Car Park	Public Safety	Observe/Monitor	Variable
Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Other	Public Safety	Observe/Monitor	
Honeycroft, Waldegrave Way, Lawford, Manningtree, CO11 2DY Front Entrance	Public Safety	Recognise	Stationary
Vyntoner House, Kincaid Road, St Osyth, CO16 8QZ Entrance	Public Safety	Recognise	Stationary
Vyntoner House, Kincaid Road, St Osyth, CO16 8QZ Rear Garden	Public Safety	Observe/Monitor	Variable
Vyntoner House, Kincaid Road, St Osyth, CO16 8QZ Car Park	Public Safety	Observe/Monitor	Variable
Vyntoner House, Kincaid Road, St Osyth, CO16 8QZ Main Door	Public Safety	Recognise	Stationary
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Car Park	Public Safety	Observe/Monitor	Variable
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Side Drive	Public Safety	Observe/Monitor	Variable
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Car Park	Public Safety	Observe/Monitor	Variable
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Main Door	Public Safety	Recognise	Stationary
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Car Park	Public Safety	Observe/Monitor	Variable
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Hall Way	Public Safety	Observe/Monitor	Variable
Groom House, St Anne's Road, Clacton on Sea, CO15 3NE Side Drive Way	Public Safety	Observe/Monitor	Variable
St Marys, Crossfield Road, Clacton on Sea, CO15 3QS Main Door	Public Safety	Recognise	Stationary
St Marys, Crossfield Road, Clacton on Sea, CO15 3QS Rear Garden	Public Safety	Observe/Monitor	Variable

St Marys, Crossfield Road, Clacton on Sea, CO15 3QS Main Entrance	Public Safety	Recognise	Stationary
St Marys, Crossfield Road, Clacton on Sea, CO15 3QS Garden	Public Safety	Observe/Monitor	Variable
Mead House, Saville Street, Walton on Naze, CO14 8PP Rear Garden	Public Safety	Observe/Monitor	Variable
Mead House, Saville Street, Walton on Naze, CO14 8PP Washing Lines	Public Safety	Observe/Monitor	Variable
Mead House, Saville Street, Walton on Naze, CO14 8PP Court Yard	Public Safety	Observe/Monitor	Variable
Mead House, Saville Street, Walton on Naze, CO14 8PP Car Park	Public Safety	Observe/Monitor	Variable
Mead House, Saville Street, Walton on Naze, CO14 8PP Main Entrance	Public Safety	Recognise	Stationary
Mead House, Saville Street, Walton on Naze, CO14 8PP Main Door	Public Safety	Recognise	Stationary
Mead House, Saville Street, Walton on Naze, CO14 8PP Ramp	Public Safety	Recognise	Stationary
Greenfields, Edenside, Kirby Cross, Frinton on Sea, CO13 OTQ Main Door	Public Safety	Recognise	Stationary
Greenfields, Edenside, Kirby Cross, Frinton on Sea, CO13 OTQ Car Park	Public Safety	Observe/Monitor	Variable
Greenfields, Edenside, Kirby Cross, Frinton on Sea, CO13 OTQ Main Entrance	Public Safety	Recognise	Stationary
Greenfields, Edenside, Kirby Cross, Frinton on Sea, CO13 OTQ Rear Garden	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Main Road	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Main Road Main Entrance	Public Safety	Recognise	Stationary

Belmans Court, Deanes Close, Dovercourt, CO12 4JH Hallway	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Rear Garden	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Rear Garden	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Main Door	Public Safety	Recognise	Stationary
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Hallway	Public Safety	Observe/Monitor	Variable
Belmans Court, Deanes Close, Dovercourt, CO12 4JH Main Door	Public Safety	Recognise	Stationary
Stand Alone Systems			
Town Hall, Station Road, Clacton, CO15 1SE 16 static cameras	Public Safety, Vandalism, Theft	Recognise	Stationary
Civic Offices, Pier Avenue, Clacton, CO15 1NJ 13 static cameras	Public Safety, Vandalism, Theft	Recognise	Stationary
Northbourne Depot, Vista Road, Clacton on Sea, Essex, CO15 6AY 12 static cameras	Public Safety, Vandalism, Theft	Recognise	Stationary
Public Convenience, Greensward, Frinton on Sea 1 static camera	Public Safety	Observe/Monitor	Stationary
Clacton Leisure Centre, Vista Road, Clacton-on-Sea, CO15 6DB 30 cameras internal & external	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary

Walton Lifestyles, Bath House Meadow, Prince's Esplanade, Walton on the Naze, CO14 8PZ  16 cameras (9 internal & 7 external)	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary
Dovercourt Bay Lifestyles, Low Road, Dovercourt, Harwich, CO12 3TA  26 cameras (4 external, 10 internal, 8 underwater & 4 poolside)	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary
Harwich Sports Centre Hall Lane, Dovercourt, Harwich, CO12 3TB  14 cameras owned by Harwich School	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary
Manningtree Sports Centre, Colchester Road, Lawford, Manningtree, CO11 2BN  11 cameras (2 external & 9 internal)	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary
Brightlingsea Sports Centre, 27 Samson's Road, Brightlingsea, Colchester, CO7 0RN  4 cameras (1 external & 3 internal.)	Public Safety, Antisocial Behaviour, Vandalism, Theft	Observe/Monitor	Stationary
Jaywick Enterprise Centre, Lotus Way, Jaywick, Clacton-on-Sea, CO15 2LU  3 static cameras covering side and rear aspect	Public Safety, Antisocial Behaviour, Vandalism, Theft	Not monitored	Variable

# APPENDIX 4

## DECLARATION OF CONFIDENTIALITY - THE CCTV SYSTEM

I, ....., am retained by the Tendring District Council to perform the duty of CCTV Operator / Supervisor / Manager / Insert other\*. I have received a copy of the Code of Practice in respect of the operation and management of that CCTV System.

I hereby declare that:

I am fully conversant with the content of that Code of Practice and understand that all duties which I undertake in connection with the Integrated Public Safety System must not contravene any part of the current Code of Practice, or any future amendments of which I am made aware. If now, or in the future, I am or become unclear of any aspect of the operation of the System or the content of The Code of Practice, I undertake to seek clarification of any such uncertainties.

I understand that it is a condition of my employment that I do not disclose or divulge to any individual, firm, company, authority, agency or other organisation, any information which I may have

acquired in the course of, or for the purposes of, my position in connection with the CCTV System, verbally, in writing or by any other media, now or in the future, (including such time as I may no longer be retained in connection with the CCTV System for a period of 10 (ten) years from the date of leaving).

In appending my signature to this declaration, I agree to abide by the Code of Practice at all times. I also understand and agree to maintain confidentiality in respect of all information gained during the course of my duties, whether received verbally, in writing or any other media format - now or in the future.

I further acknowledge that I have been informed and clearly understand that the communication, either verbally or in writing, to any unauthorised person(s) of any information acquired as a result of my employment with Tendring District Council may be an offence against the Official Secrets Act of 1911, Section 2, as amended by the Official Secrets Act of 1989.

Signed: ..... Print Name: .....

Witness: ..... Position: .....

Dated this ..... day of ..... (Month) ..... (Year)

\*delete / insert where applicable