

# Closed Circuit Television Code of Practice

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Code of practice for the Operation of CCTV:

The Operation of CCTV for Dacorum Borough Council		
	Dacorum Borough CouncilCCTV System	
Certii	ficate of Agreement	
The content of this Code of Practice are hereby approved in respect of the Dacorum Borough Council Closed Circuit Television System and, as far as reasonably practicable, will be complied with at all times by all who are involved in the management and operation of the named System		
Signed for and on behalf of <u>Dacorum Bo</u>	orough Council	
Signature	Name	
Position held	Dated the day of	

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#### Dacorum Borough Council (DBC)

**Community Control Centre (CCC):** The CCTV Community Control Centre, under the control of Dacorum Borough Council (DBC).

**CCTV Operator:** The person responsible for watching, controlling equipment and recording the images produced by DBC CCTV cameras linked to the CCC and performing all CCC duties

**CCTV/CCC Manager:** The person employed by DBC to manage the CCTV Service and to oversee the operators to provide CCC services.

**CCTV Systems Manager:** Dacorum Borough Councils Assistant Director of Legal Governance management (Corporate and Contracted Services)

**Police Control Room (PCR):** Hertfordshire Constabulary Force Command and Control facility, Welwyn Garden City

**British Security Industry Association (BSIA):** The security industry body that accredits security companies where compliance with ISO 9002 Quality Standards is mandatory.

#### 1. Introduction

#### 1.1 What is the Code of Practice? (Referred to as 'the Code')

This Code of Practice explains the principles, purposes, operation and management of CCTV by Dacorum Borough Council. It seeks to provide accountability and reassurance to the public that all those connected with CCTV will comply with the law and ensure the right to privacy is not breached. The Code will also outline how CCTV is operated and managed and how the public may access recorded information or make complaints.

#### 1.2 Why DBC uses Closed Circuit Television

The use of CCTV is a necessary and proportionate way of helping with a wide range of issues that affect the public in public places and buildings for which Dacorum Borough Council has a responsibility. DBC also values the use of CCTV to protect its staff where

appropriate. The Council has taken into account the nature of the problems to be 5

addressed, and has implemented CCTV only in those areas where its use is justifiable and where it can provide an effective solution. The council will regularly evaluate whether it is necessary and proportionate to continue using it.

The CCTV service is established and operated on a legal basis and is supported by:

- The General Data Protection Regulation (GDPR) / The Data Protection Act (DPA) 2018
- The Human Rights Act (HRA) 1998
- Protection of Freedoms Act (PoFA) 2012
- Freedom of Information Act (FOIA) 2000
- The Crime and Disorder Act (CDA) 1998
- Other relevant legislation according to specific use of CCTV in special circumstances

We recognise public support for CCTV is still popular. To keep the respect and support of the general public, CCTV must be used fairly, legally and with the utmost integrity at all times. CCTV operations must stand up to scrutiny and be accountable to the communities and people they are aiming to protect.

#### 1.3 The Dacorum Public Space CCTV System

The Dacorum Public Space Surveillance (PSS) CCTV System consists of 178 cameras installed at various strategic locations throughout the Hemel Hempstead, Tring and Berkhamstead Town Centres including streets, parks, Neighbourhood Centre's (Local Estate Shopping Areas) public places and car parks. It includes the following areas of surveillance: -

- Grove Hill Neighbourhood Centre
- Adeyfield Neighbourhood Centre
- Bellgate Neighbourhood Centre
- The Heights Neighbourhood Centre
- Bennetts End Neighbourhood Centre
- The Denes Neighbourhood Centre
- Leverstock Green Neighbourhood Centre
- Chaulden Neighbourhood Centre
- Warners End Neighbourhood Centre
- Gadebridge Neighbourhood Centre
- Hemel Hempstead Town Centre
- Gadebridge Park
- The Old Town Hemel Hempstead

- Berkhamsted Town Centre
- Tring Town Centre

The cameras offer full colour, pan, tilt and zoom (PTZ) capability, some of which may be automatically switched to compensate for low light conditions. DBC has the capability to redeploy some of their CCTV cameras in order to respond to changing trends and justified community needs.

Images from these PSS cameras are sent to the Community Control Centre (CCC) in Hemel Hempstead where they are monitored and recorded. The CCC is staffed by operators employed by the council who have undergone suitable, accredited training.

There is a dedicated CCTV link to the Hertfordshire Constabulary Control Room in Welwyn Garden City where live pictures and events can be monitored.

All CCTV material controlled and recorded by the CCC remains the property of Dacorum Borough Council.

#### 1.4 Other CCTV Systems operated by Dacorum Borough Council

Dacorum Borough Council is also responsible for CCTV systems installed and operated at other locations throughout the Borough including:

- Cupid Green Waste Transfer Station
- Tringford Depot Refuse Storage Facility
- The Forum
- The Old Town Hall
- The Elm's Homeless Hostel
- Woodwells Caravan Storage Park
- The Bury
- Bellgate Flats Highfield
- The Heights Flats Highfield
- Bennetts Gate Flats Bennetts End
- Maylands Business Centre
- The Dacorum Sports Centre
- Poppy Fields Cemetery

#### 1.5 Who is involved?

Dacorum Borough Council work closely with the following stakeholders to deliver CCTV services:

- Hertfordshire Constabulary
- The Dacorum Community Safety Partnership
- Council departments

From time-to-time other local stakeholders may be involved in developing the future use of CCTV. Details of roles and responsibilities for key personnel responsible for DBC CCTV are shown in **Appendix A** to this Code.

#### 1.6 Applying the Code of Practice

The Code will underpin day-to-day practice by all those operating CCTV. It will be supported by specific operational procedures for the CCC. Everyone connected with CCTV operated by Dacorum Borough Council will ensure that the principles and purposes outlined in this Code are upheld at all times.

A copy of the Code will be available on the Council's web site www.dacorum.gov.uk

# 2. Purposes of CCTV

Dacorum Borough Council operates CCTV for the following reasons:

- 1. To help prevent, detect and reduce crime, disorder and anti-social behaviour including drug and alcohol related violent crime
- 2. To reduce public apprehension about crime, anti-social behaviour and aggression and to provide reassurance for all those that live, work, trade and visit Dacorum, thereby enhancing community safety and boosting the economy
- 3. To assist statutory agencies (police, council etc.) to deploy their resources effectively
- 4. To assist in the management of the public areas covered by CCTV and support Dacorum Borough Council's civil enforcement and regulatory functions.
- 5. To monitor traffic flow and assist in traffic management issues
- 6. Identify, apprehend and prosecute offenders in relation to crime, criminal damage, public order, road traffic accidents involving serious injury and all forms of harassment cases
- 7. To assist in civil emergencies and countering terrorism

- 8. To assist the emergency services in all aspects as appropriate, including major exercises relating to criminal activities and public safety
- 9. Provide the Police, the DBC, and other authorised organisations with evidence upon which to take criminal and civil actions in the Courts including identifying witnesses
- 10. Promote the objectives of Hertfordshire Constabulary and the DBC
- 11. Assist in the enforcement of licencing and regulatory functions of the DBC
- 12. To assist in the training of CCTV operators, the police and others involved in the use and operation of the CCTV system
- 13. In appropriate circumstances, assisting the investigation of damage only accidents in DBC owned or other privately operated surveilled car parks on the payment of an appropriate fee

The Council's Chief Executive, or the Community Safety Partnership, after consultation, may draw up specific objectives based on local concerns. These will be documented, made available as necessary and reviewed periodically.

# 3. General Operating Principles

- 1. Dacorum Borough Council supports an individual's right to privacy and expects this to be a paramount consideration for all persons involved with CCTV operated by DBC. Evidence will be kept securely and made available subject to clause 9.6 to ensure everyone's right to a fair trial in the event of any court proceedings or tribunal.
- 2. CCTV operations will comply with the general data protection regulations at all times and follow the Information Commissioner's Code of Practice for surveillance systems. CCTV will be operated fairly, within the law, and only for the stated purposes. Throughout this Code it is intended, as far as possible, to offer a balance between the purposes of CCTV and the need to safeguard the individual's right to privacy.
- 3. Occasionally CCTV may be required to assist with 'covert' operations by specific public bodies (e.g. police, councils, HMRC etc.). On every occasion proper authority will be obtained and comply with the Regulation of Investigatory Powers Act 2000 (RIPA) and guidance from the Office of Surveillance Commissioners (OSC). When undertaken by the Council, any covert surveillance authorised under RIPA will meet the required 'crime threshold' and be further authorised by a Magistrates' Court.

- 4. The decision to install CCTV systems, or continued use of them will be supported by Operational Requirement and Privacy Impact Assessment documentation to justify its use. This process will be regularly reviewed. Installation and use of CCTV should be undertaken in consultation with the public, community organisations, council staff, the Police and the Crown Prosecution Service where appropriate. 'Privacy zones' may be technically applied to ensure privacy is protected in specific areas. CCTV will only be used where it is reasonable, necessary and proportionate.
- 5. Dacorum Borough Council will set performance criteria for the quality of recorded images prior to the installation of CCTV under their control and will insist that these standards are maintained. Any CCTV system connected to the DBC CCC will meet strict technical criteria.
- 6. Use of CCTV by any DBC department, individual or stakeholder will fully comply with this Code of Practice.
- 7. Any major changes to the Code will only take place after consultation with all interested parties in the operation of the specific CCTV system. Minor changes may be agreed between the persons nominated in **Appendix A**.

# 4. General Data Protection Regulation information

The Data Controller for CCTV systems operated by Dacorum Borough Council is its Chief Executive. Day to-day responsibility for CCTV data is with the Assistant Director of Legal Governance management (Corporate and Contracted Services) or a nominated individual on their behalf. This will be further delegated to the responsible person on duty at the specific site covered by CCTV or at the CCC; normally the CCC Manager.

Operation of CCTV by DBC has been notified to the Office of the Information Commissioner. Notification is an annual process to register an individual organisations data processing, including CCTV. The DPA Register is published on the Commissioner's website <u>www.ico.gov.uk</u>.

All data will be processed in accordance with the principles of the General Data Protection Regulations which are published on the Commissioner's website <u>www.ico.gov.uk</u>.

All CCTV operators will use every effort to promptly report faults in accordance with maintenance agreements to ensure CCTV equipment is maintained 'fit for purpose' as required by Data Protection Act 1998.

Surveillance systems operated by DBC will be compliant with the Information Commissioner's Surveillance Systems Code of Practice at all times The full ICO Surveillance Systems' Code can be obtained from the website <u>www.ico.gov.uk</u>.

# 5. Protection of Freedoms Act 2012 information

The Protection of Freedoms Act 2012 became effective in May 2012. This requires the Secretary of State to prepare a CCTV code of practice and appoint a Surveillance Camera Commissioner. The parliamentary CCTV Code became effective in August 2013. It contains 12 principles for CCTV and Dacorum Borough Council has a duty to have regard to this CCTV code. The Council will always ensure cameras are installed and used:

- a. For a legitimate aim
- b. To meet a pressing need
- c. Proportionately and Effectively
- d. In Compliance with legal obligations

A failure by any person to act in accordance with any provision of the parliamentary code does not of itself make that person liable to criminal or civil proceedings. The code is admissible in evidence in criminal or civil proceedings. A court may take into account a failure by a relevant authority to have regard to the code in determining a question in any such proceedings.

Visit: https://www.gov.uk/government/organisations/surveillance-camera-commissioner

# 6. Staffing of the Community Control Centre (CCC)

#### 6.1 General

Dacorum Borough Council provides 'in-house' staff to provide monitoring services. The CCC will only be staffed by trained operators in accordance with DBC policy and operational procedures.

All staff will be fully conversant with this Code and their operational procedures which they will be expected to comply with as far as reasonably practicable at all times.

DBC intends to develop its CCC service and generate income by offering the monitoring service to local businesses and other third parties. Income will offset costs and contribute to DBC financial efficiencies.

#### 6.2 Private Security Industry Act 2001 and the Security Industry Authority (SIA)

Under the provisions of the Private Security Industry Act 2001 it is a criminal offence for staff to be 'contracted' as public space surveillance (CCTV) operators in England, Wales and Scotland without an SIA licence. The Security Industry Authority is the organisation responsible for regulating the private security industry. For more information visit: <u>www.sia.homeoffice.gov.uk</u>

Any contracted staff operating in the CCC will be in possession of an SIA CCTV Licence in compliance with this legislation.

#### 6.3 Staff Vetting

It will be a condition of employment that all staff being selected for a role in the CCC satisfactorily complete locally agreed vetting procedures and those defined by the SIA for a CCTV Licence.

#### 6.4 Staff Training

Every member of staff directly connected to the operation of CCTV or with responsibility for the CCC will be trained appropriately for their role. As a minimum the SIA CCTV Licence demands a structured training programme that results in a recognised qualification. The Information Commissioner's Surveillance Code requires all staff to be trained in their responsibilities for data management.

#### 6.5 Discipline

Every individual with any responsibility for CCTV under the terms of this Code or related procedures will be subject to this Council's disciplinary procedures should there be any breach of the Code or of any aspect of confidentiality. A breach of the Code may also result in criminal proceedings.

# 7. Access to and Security of CCTV - Community Control Centre

#### 7.1 Authorised Access

Access is restricted to ensure security and confidentiality of the information inside the CCC. Entry will not be allowed without sufficient reason and in accordance with clause

Regardless of anyone's status, all access to the CCC will be recorded in a Visitors Log. All visitors will be reminded of the need for confidentiality by displayed notices and a clause in the Visitors Log. Operational staff will ensure only authorised access and an accurate visitors log is maintained and enforced.

Operational staff, approved by the DBC CCTV System Manager, who frequently go into the CCC as part of their daily duties are exempt from signing the Visitor Log providing they have signed a Declaration of Confidentiality. This will be managed by the CCTV Manager.

#### 7.2 Public Access

In the interest of openness and accountability, anyone wishing to visit may be permitted to do so, subject to the approval of the DBC CCTV Manager. Operators must always be aware of public visits in advance and the visits may be ended for operational reasons at the discretion of the CCTV Operator. All public visits will be conducted and recorded in accordance with agreed operational procedures.

#### 7.3 Security

Access control measures will be used to ensure security and confidentiality of the CCC. Authorised personnel will be present at all times when the equipment is in use. If the CCC is left unattended for any reason it will be secured. In the event of evacuation for safety or security reasons, the agreed operational procedures will be complied with.

# 8. Access to and Security of CCTV – Other DBC sites

#### 8.1 Authorised Access

Access to any CCTV monitoring or recording equipment on other DBC sites is restricted to ensure security and confidentiality of the information processed. Only nominated key staff will be allowed to access equipment and recordings for proper reasons and must only be for the stated purposes of CCTV.

Access control measures will be used to ensure security and confidentiality where necessary. There will not be any public access to equipment or recordings at these sites. Individual access to 'personal data' is not affected by this clause.

# 9. Operation and Management of CCTV by DBC

#### 9.1 General

All the equipment associated with either the main public-space CCTV system (PSS) or the other CCTV systems operated by DBC departments, (regardless of whether it is connected to the CCC), will only be operated by nominated personnel who have been properly trained in its use and local operating procedures.

All staff responsible for any DBC CCTV system will be careful about exercising personal prejudices, which may lead to complaints about CCTV being used for purposes for which it is not intended. Staff may be required to justify their monitoring, recording or disclosing of images of any persons, activity or property at any time.

#### 9.2 Signs

Signs will be placed in the areas covered by cameras to make the public aware of CCTV surveillance. The signs will indicate:

- The presence of CCTV monitoring (typically using a graphic of a CCTV camera)
- The 'ownership' of the System (unless it's obvious; i.e. Town Hall etc.) A contact telephone number for further information

#### 9.3 Camera positions

If CCTV is the most appropriate means of addressing a pressing need, cameras will be sited in positions to meet that need after preparing an operational requirement document and privacy impact assessment. CCTV must be justified, meet the purpose for which it was installed and recordings must be of an appropriate quality.

Cameras will be restricted to ensure they do not view areas that are not of interest and are not intended to be seen; e.g. an individual's private property. Electronic 'privacy zones' may be used to ensure that the interior of any private property cannot be viewed.

As far as is reasonable, all cameras will be sited in positions that minimise risk to tampering, damage or destruction.

#### 9.4 CCTV Monitoring – CCC

The CCC is permanently staffed (24 hours / 365 days a year) by SIA accredited and trained operators to provide fully specified CCC services. The operator's main role is to continuously monitor, identify and respond to incidents. The cameras will only be used for the purposes stated. The operators may be required to justify their monitoring or recording of any persons, activity or property at any time.

From time to time arrangements may be made for council or police staff to be present in the Control Room to support CCTV operations. This will always be in accordance with this Code and agreed operational procedures.

There is a dedicated CCTV link to the Police Control Room (PCR) in Welwyn Garden City where incidents and events can be viewed. This secure link can only be activated from the CCC for appropriate purposes and in accordance with agreed operational procedures.

General surveillance will remain the responsibility of CCC operations. Protection of the public will always remain the top priority at all times.

The CCTV/CCC Manager will undertake day-to-day management, co-ordination and overseeing of CCC operations.

#### 9.5 CCTV Monitoring – Other DBC sites

At some DBC sites where CCTV is installed, monitors are installed to provide staff with the opportunity to watch 'live' images when necessary. Monitoring is not a prime function at these sites.

#### 9.6 Transmission, Recording and Storing CCTV Images

CCTV cameras transmit images to the CCC or direct to a local on-site recording device using a variety of methods. These include cables, wireless signals and computer networks. Security of transmission remains paramount. Transmission will either be owned by the Council or provided under contract by an industry supplier.

DBC uses Network and Digital Video Recorders (N/DVR's) to record the images from all cameras throughout every 24-hour period. The N/DVR's are either housed securely in the CCC or secure locations at specific DBC sites. Recorded images are retained on the

N/DVR's for no longer than 31 days. Retention periods may vary dependant on site specific issues but will not exceed this limit at any site to ensure compliance with the Data Protection Act.

After retention the recorded images are erased using an automatic digital process called 'overwriting'. This meets the requirements of not keeping data for longer than necessary; a principle of data protection.

All recordings stored at CCC can be replayed on the dedicated computer workstations and in a secure area. Only authorised staff can download copies of recorded images when required for proper purposes. These images will then be kept for longer in accordance with the rules of evidence.

At any other DBC site, any recording, viewing and exporting of images will only be undertaken by trained and authorised staff; the public must have total confidence that information recorded about them by CCTV will be treated with integrity, security and respect for their privacy.

#### 9.7 ANPR

Automatic Number Plate Recognition (ANPR) uses specific cameras set to capture a vehicle as it passes an ANPR camera. Its registration number is read and instantly checked against a database of vehicle records. Police are the primary users of this technology, although DBC uses one ANPR camera to manage the access of vehicles on a 'white list' to pedestrian shopping areas.

ANPR by the police is used to help detect, deter and disrupt criminality at a local, force, regional and national level, including tackling travelling criminals. ANPR provides lines of enquiry and evidence in the investigation of crime and is used by law enforcement agencies throughout the UK. Many commercial and retail sites now use ANPR cameras to aid vehicle management.

#### 9.8 Body Worn Video (BWV)

BWV involves the use cameras that are worn by a person and are usually attached to their clothing or uniform. These devices can often record both visual and audio information. They are increasingly used by law enforcement agencies, but their reducing cost means other groups are able to purchase and use such equipment.

BWV systems are likely to be more intrusive than the more 'normal' CCTV surveillance systems because of its mobility. Therefore before each use of BWV, The Dacorum Borough Council will:

- Justify its use and consider whether or not it is proportionate, necessary and addresses a pressing need
- Have the ability to switch BWV on and off as necessary as it is important to know when and when not to record. Continuous recording will require strong justification as it is likely to be excessive and cause a great deal of collateral intrusion
- Carefully consider the need for audio as well as visual recording as the presence of audio recording adds to the privacy intrusion. (See 9.9 below)
- Comply fully with the BWV guidance in the ICO Code for Surveillance Systems

#### 9.9 Audio Recording

DBC considers the use of audio recording, particularly where it is continuous, to be more privacy intrusive than purely visual recording. Its use will therefore require much greater justification. DBC will only use audio recording where:

- A pressing need is identified
- Other less intrusive methods have been explored, and these will not appropriately address the need and the only way is through the use of audio recording
- Appropriate privacy by design methods have been incorporated into the system

#### If DBC decides to use audio recordings in specific circumstances they will ensure:

- A thorough privacy impact assessment will be carried out
- The system provides a high enough quality of recording to achieve the stated aim
- The most privacy friendly approach is used; where video and audio recording can be controlled and turned on and off independently of each other. These two types of data

processing should be considered as separate data streams and should be controlled separately to ensure irrelevant or excessive data is not obtained and held

- Consultation with staff in advance; where recording conversations between staff and particular individuals is needed for a reliable record of what was said and might be used as evidence in an investigation or audio recording is triggered due to a specific threat
- It is made clear to data subjects that audio recording is taking place, over and above any visual recording which is already occurring

#### 9.10 Audit Trail (Record keeping)

Records will be kept, either paper-based or electronically on a computer, of all relevant activity associated with the operation and management of any DBC CCTV or surveillance system. This will typically include but is not limited to:

- Access and Visitors name, times in/out and reasons for visit
- Actions taken by the staff and incidents reported to or seen by them
- Review and disclosure of CCTV images
- Fault reporting and rectification and the regular maintenance programme

Every CCTV recording or operational record has the potential of being required as evidence at some point. This means any material produced by DBC staff (permanent or contract), or produced by CCTV equipment including recordings, any copies and paper or electronic records.

All record keeping will be carried out in accordance with local operating procedures.

At the CCC, the CCTV management software will enable authorised staff to examine the use of CCTV and records created, in order to compile reports.

#### 9.11 Maintenance of CCTV

To ensure compliance with legislation and national Codes of Practice, DBC will ensure all their CCTV systems are appropriately maintained in accordance with operational procedures and maintenance agreements.

Maintenance agreements will make provision for regular / periodic service checks on the equipment which will include cleaning of all-weather domes or housings, checks on the functioning of the equipment and any minor adjustments that need to be made to the equipment settings to maintain picture quality. Agreements will also include regular periodic overhaul of all the equipment and replacement of equipment, which is reaching the end of its serviceable life.

The maintenance agreement will also provide for 'emergency' attendance by a specialist CCTV engineer to rectify any loss or severe degradation of image or camera control.

DBC and the maintenance contractor will keep appropriate records.

# 10. Viewing and Disclosure of CCTV Recordings

#### 10.1 General

Viewing and disclosure of recorded images from any DBC CCTV System must be controlled and consistent with the purposes of CCTV. Safeguarding an individual's rights to privacy will always remain a priority.

CCTV information will not be copied, sold, disclosed or used for commercial or entertainment purposes. Occasionally recordings may be used for the following:

- Training and demonstration purposes but the material will be selected by the CCTV/CCC Manager in consultation with the Police and its use will be strictly controlled
- For the purpose of research:

• To assist in the general planning and management of the areas of

coverage

• To assist in identification and compiling of information relating to

public safety

• To assist in the efficient management of services in the areas of CCTV coverage

Written authorisation from the CCTV/CCC Manager will be required before access for research purposes. The copying of material or its removal from the Community Control Centre for research purposes will only be permitted under exceptional circumstances and shall be fully documented.

All requests for viewing and disclosure of any DBC CCTV information will be in accordance with operational procedures, which contain detailed national standards. Key aspects are covered from 10.2 below. For recordings held at the CCC, the management of requests will be the responsibility of the CCTV Manager although in day-to-day practice disclosure is usually carried out by CCTV Operators. At stand-alone DBC CCTV sites, requests for viewing and disclosure of CCTV images will be the responsibility of a nominated individual in consultation with the DBC CCTV/CCC Manager.

Generally copyright and ownership of all CCTV information will remain with the DBC Data Controller. Once CCTV images have been disclosed to another body (such as the police), then *they* become the Data Controller for their copy of the images. It is their responsibility to comply with the General Data Protection Regulations in relation to any further disclosures.

#### 10.2 Main Requests for Viewing and Disclosure

Requests for viewing and disclosure of CCTV information will normally be granted to organisations that show valid reasons, which meet the stated purposes of CCTV. These are mainly (but not limited to) the following organisations:

- All UK police staff, (including Ministry of Defence and Military Police)
- Statutory authorities with powers to prosecute, (e.g. H.M. Revenue and Customs, councils, Trading Standards, Environmental Health, etc.)
- Solicitors or their legal representatives in criminal or civil proceedings; (such a request may incur a fee)

- Individuals representing themselves in judicial proceedings
- Other agencies (e.g. Insurance companies) according to purpose and legal status (such a request may incur a fee).

All requests will be supported by a written record in accordance with operational procedures; a copy of the DBC CCTV Data Access Request Form is shown at **Appendix B**, which will be completed and approved in all cases. Viewing and disclosure of information will not be unduly obstructed however, CCC operators may refuse requests to provide CCTV footage if insufficient information or an invalid reasons has been provided.

#### 10.3 Requests for Disclosure by Members of the Public (Subject Access)

Individuals recorded by CCTV have a right to view images relevant to them; ('personal information') and unless agreed otherwise, be provided with a copy of the images. Requests by members of the public for CCTV images are limited to 'personal information' as required by the General Data Protection Regulations. These are called 'Subject Access' Requests (SAR). Third-party information (e.g. another's' identity or vehicle registration number) will not be disclosed through such requests.

A SAR must be made in written form to DBC; in the first instance to the CCTV/CCC Manager. The applicant must satisfactorily prove their identity and provide sufficient information to enable the data to be located. The first response to a request will normally be given within 7 working days of receipt. The requested information will be provided within 1 calendar month of receipt if the recording is still held.

Judgements about disclosure will be made by those responsible for operating CCTV. If third-party information is also shown with the images of the applicant, consideration will be given to obscuring the images. This ensures unfair intrusion into the privacy of the third party, or causing unwarranted harm or distress is prevented.

Requests for personal information will not be granted in circumstances that involve the prevention or detection of crime and the apprehension or prosecution of offenders where disclosure may prejudice proceedings. Other disclosure rules may apply.

#### **10.4 Freedom of Information Act 2000**

The Freedom of Information Act (FOIA) gives the public a general right of access to official information held by most public authorities (police or councils, etc.). It also applies to companies, which are wholly owned by public authorities. Typically it applies to

information around decisions, statistics, spending money and effectiveness. Requests may be by letter or email. The public authority must state whether it holds the information and normally supply it within 20 working days in the format requested.

When responding to requests, there are procedural requirements set out in the Act, which an authority must follow. There are also valid reasons for withholding information, which are known as exemptions from the right to know. FOIA exemptions apply to disclosure of CCTV images:

- If the images are those of the FOIA applicant the information will be treated as a Subject Access Request as explained at 10.3 of this Code
- If the images are of other people/vehicles etc., these can only be provided if disclosing the particular information does not breach the data protection principles

In practical terms, if individuals are capable of being identified from the relevant CCTV images, then it is personal information about the individual concerned. It is unlikely that this information can be disclosed in response to an FOIA request. The applicant could potentially use the images for any purpose and the individual concerned is unlikely to expect this and it is likely to be unfair processing breaching the Data Protection Act (DPA).

This guidance is not exhaustive and full information on FOIA issues can be found at the ICO website: <u>www.ico.gov.uk</u>

#### 10.5 Requests for Disclosure by the Media

Requests for CCTV images from the media will always be considered if they meet the stated purposes of the CCTV or it is in the public interest for the images to be disclosed. The disclosure will include a signed release document that clearly sets out what the data will be used for, the limits on its use and retention of editorial control by Dacorum Borough Council.

Hertfordshire Constabulary will be permitted to release recorded material to the media in connection with an investigation or detection of a crime without prior approval of DBC. Material should relate to specific incidents and only be released in accordance with the National Police Chief's Council media guidance and Hertfordshire Constabulary procedures. Strict copyright conditions that do not allow it to be used for entertainment or any other purposes will apply.

The CCTV/CCC Manager should be advised of the release of the recorded material to the media. Every effort should be made to give the notification prior to its release.

#### 10.6 Summary of Fees

For search and production of CCTV footage;

Search of relevant footage £50

Production of Footage physical media or electronic production £100

# 11. Evaluation of DBC CCTV Systems

#### 11.1 The Dacorum Public Space CCTV System

The CCTV Lead Officer at the CCC will be responsible for carrying out regular checks on CCTV and operational systems to ensure that the procedures are being followed. Any discrepancies will be reported without delay to the CCTV/CCC Manager.

The DBC Assistant Director of Legal Governance management (Corporate and Contracted Services) or nominated person will be responsible for receiving regular and frequent reports on the operation of CCTV. The Council may nominate a person and/or committee with a specific responsibility for receiving and considering those reports.

A range of performance indicators for monitoring and evaluating effectiveness of public space CCTV will be used:

- Contribution to public reassurance (public safety and quality of life issues)
- Original reason for the camera being installed; changes to purpose / environment
- Community and Police crime data; offence types, incidents, associated arrests and local intelligence
- CCTV Control Centre incident logs and performance indicator information
- CCTV Council Control Centre operator capacity
- Age and Annual cost of the camera, (connection/power and repair costs)

This approach includes the wider issues for justifying continued of CCTV.

The System will be audited in accordance with the policy of the Council. From time-to time the System will be independently evaluated to assess the overall performance of CCTV. Statistical and other relevant information, including any complaints made, will be included in the DBC PSS CCTV Annual Report.

#### 11.2 Other DBC CCTV Systems

All Dacorum Borough Council CCTV systems will be reviewed on a frequent basis; at least annually, to ensure compliance with national Codes of Practice, the General Data Protection Regulations and to validate their need and continued use. A nominated person at each site will be responsible for carrying out regular checks on CCTV. The DBC Assistant Director of Legal Governance management (Corporate and Contracted Services) or nominated person will be responsible for receiving the reports.

#### 11.3 General evaluation issues

The use of DBC CCTV should be evidenced-based. Cameras should be reviewed annually using evidence available to Dacorum Borough Council and its CCTV stakeholders. Where evidence can be found to show that a CCTV camera location continues to be justified under the Code of Practice for CCTV the camera should remain.

Where evidence, gathered over a 12-month period, cannot be found to show that a CCTV camera location continues to be justified the camera should be:

- Removed and placed at another location known to have a pressing need or be experiencing serious, frequent anti-social / criminal behaviour which can be shown to be negatively impacting on the wider community and which continues despite actions by Dacorum Community Safety Partnership agencies to reduce/resolve the problem, (or)
- Removed with the camera placed in storage or dismantled for spare parts and the camera site decommissioned (where no pressing need, current crime or disorder issues have been identified justifying the installation of a camera or where insufficient funding is available to relocate the camera)

The results of any aspect of evaluation will be used to review and develop alterations to the purposes for CCTV, as well as the management and operation of CCTV systems.

# **12 New CCTV installations and equipment**

From time to time services in DBC will request that CCTV be installed or areas will be identified that may benefit from CCTV. It is essential in these instances that the CCTV

/CCC Manager is the lead in this process to ensure there is compliance to the Code of Practice and legislation.

All requests for new or additional CCTV installation should be made to the CCTV Manager and have followed due process and they will be considered by a Community Safety Partnership panel. They will then be considered with the evidence provided to ensure they meet the requirements of the code and are compatible with DBC systems.

# **13. Making Enquiries or Complaints about CCTV**

A member of the public wishing to make enquires or a complaint about any aspect of DBC CCTV System may do so by contacting the DBC CCTV/CCC Manager.

All complaints will be treated seriously. They will be dealt with in the same way as the discipline and complaints procedures, which apply, to all members of the Council and Hertfordshire Constabulary staff. Copies are available from the respective organisations.

The DBC CCTV/CCC Manager will ensure that every complaint is acknowledged in writing, which will include advice about the procedure to be undertaken. Details of all complaints and the outcome will be included in the regular reports supplied to the DBC Assistant Director of Legal Governance management (Corporate and Contracted Services) and included in the Council's annual report.

If the outcome from a complaint about how the CCTV system operates or how images (data) were handled is thought to be unsatisfactory, the Office of the Information Commissioner can be approached to investigate independently. Individuals have additional rights under GDPR to prevent processing likely to cause substantial and unwarranted damage or distress and to prevent automated decision taking in relation to the individual.

Visit <u>www.ico.gov.uk</u>; telephone 01625 545745 or write to:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

# Appendix A

#### Key Personnel - Roles and Responsibilities

#### **Dacorum Borough Council CCTV Systems**

#### **Owner and Data Controller:**

Dacorum Borough Council The Forum Marlowes Hemel Hempstead Herts HP1 1DN Tel. 01442 228000

http://www.dacorum.gov.uk

Responsibilities include but are not limited to:

- Determining the purposes of CCTV
- Providing the Data Protection Officers' annual Notification of the CCTV System to the Information Commissioner
- Ensuring the provisions of the General Data Protection Regulations are met
- Ensuring the provisions of the Protections of Freedoms Act 2012 are met
- Providing a CCTV Code of Practice and local operating procedures
- Ensuring the provision and maintenance of all equipment forming part of any DBC CCTV system in accordance with contractual arrangements, which the owner may from time to time enter into
- Authorising proposed alterations and additions to CCTV systems, the DBC CCTV Code and operational procedures
- Appointment of an DBC representative to assist in all CCTV matters

#### DBC CCTV Systems Management:

CCTV/ Community Control Room Manager (CCCM) Dacorum Borough Council The Forum Marlowes Hemel Hempstead Hertfordshire HP1 1DN

Tel. 01442 228000

The CCCM will be the main point of contact on behalf of Dacorum Borough Council and will have delegated authority for data control on behalf of the Data Controller.

Responsibilities include but not limited to:

- First point of contact for DBC CCTV matters and DBC line manager in the Community Control Centre (CCC)
- Ensuring the day-to-day management of CCC staff and the PSS CCTV System
- Organising and maintaining the operator rota, and arranging cover as required
- Ensure support to all DBC CCTV/systems operators that have nominated responsibilities to any DBC CCTV system
- Identifying and organising operator training; coordinating all CCTV training required by security officers and other personnel to ensure the requirements of the DPA and other legislation are met
- Performing the duties of a CCTV Operator as required
- Liaison with maintenance and other contractors
- Main point of contact for Council Officers, the Police and other organisations, on operational CCTV matters
- Ensure the interests of the public, owners and other stakeholders are upheld in accordance with the terms of this Code of Practice

- Agree to any alterations and additions to CCTV systems, this Code and/or local operating procedures
- On behalf of Dacorum Borough Council and all CCTV stakeholders, implement any requirements to ensure the effective and compliant use of DBC CCTV systems

#### **CCTV/CCC Lead Officers and Operators**

- Perform the duties of a CCTV/CCC Operator
- Review historic CCTV images on behalf of legitimate interested parties when viewing requests are received
- Carry out immediate reviews of recent historic images in the event of an incident which requires clarification/investigation
- Report to the CCTV/CCC Manager
- Carrying out regular checks on CCTV and operational systems to ensure that the procedures are being followed

# **Appendix B**



# CCTV footage request form

Send your completed form to: CCTV department Cupid Green Depot Redbourn Road, Hemel Hempstead Hertfordshire, HP2 7BA

Or email it to cctv@dacorum.gov.uk

Δ	nn	lica	nt's	de	tails
A	pμ	lica	nit S	ue	lans

Title

Forename(s)\*

Address for correspondence\*

Postcode \*

Telephone (day)

Email

So that we can help you, we may contact you to clarify your request.

#### **Details of request**

Please provide as much detail as possible including time, date and location. (Please use a separate sheet if necessary)

**Please note:** Your request may incur a fee of £10 for this service. We will contact you for your approval if a charge has to be made. We may also request proof of ID to help us deal with your request. We will contact you if this is needed. Dacorum Borough Council has 40 calendar days (excluding public holidays) to comply with your request.

Signature\*

For internal use only

Date received by authority

**Request DB ID** 

Date\*

Mobile

Surname\*

**Proof of ID supplied** 

Fee

\* Mandatory information

# Appendix C

#### Camera List and Locations Dacorum Borough Council CCTV System

Camera Number	Location	How Mounted
	ANPR Marlowes Access	
115	ANPR Camera - Marlowes Access Bollards	Pole Mounted
	Council Buildings and Denste	
	Council Buildings and Depots Berkhamsted Civic Centre	
160	Berko Civic C/S Front	Static
161	Berko Civic barrier PTZ	wall mounted
162	Berko Civic Entrance lobby	Static
163	Berko Civic Entrance front right	wall mounted
164	Berko Civic C/S rear	static
165	Berko Civic Entrance front left	wall mounted
166	Berko Civic Rear car park	Static
	Control Room	
235	control room entrance	static
236	control room fire exit	static
237	reception	static
238	rear entrance	static
239	review suite	static
240	Cupid green mast camera	mast mounted
	Cupid Green Depot	
241	outgate	static
242	weigh bridge	static
243	front car park	static
244	in gate	static
245 246	hangar exit bike shed	pole mounted static
240	CSG back fence	static
247	island PTZ	pole mounted
249	wash site exit	pole mounted
250	wash site entrance	pole mounted
253	main reception	static
254	alarm main door	static
255	hangar rest area	static
256	smoking area	pole mounted
257	vehicle wash	pole mounted
258	MRF entrance	static
259	MRS rear	static
260	VRS rear exit door	pole mounted
261	VRS rear	pole mounted
262	VRS parking	pole mounted
263	VRS side The Forum	static
401	Forum cental admin	static
401	stair to lower ground	static
403	lower ground corridor	static
404	parking centre corridor	static
405	car park building entrance	static
406	external roller shutter	static
407	CSU front	static
408	CSU rear	static
409	volunteer centre	static
410	stair 2 ground floor	static
411	stair 3 ground floor	static
412	stair 1 ground floor	static
413	main entrance	static
414	reception	static
415	silver cabinet	static
416	stair 1 first floor stair 2 first floor	Missing
417 418	stair 2 first floor stair 3 first floor	static static
418 419	lift first floor	static
419	stair 1 second floor	static

421	lift second floor	static
422	stair 2 second floor	static
423	stair 3 second floor	static
424	external delivery	static
425	car park vehicl;e entrance	static
426	coombe st ptz	wall mounted
427	dacorum way ptz	wall mounted
428	Forum front ptz	wall mounted
429	Forum main entrance ptz	wall mounted
431	Roller shutter entrance	static
431		Static
	Tringford Depot	
49	Tringford Depot Rear Camera	Pole Mounted
123	Tringford Depot Front Camera	Pole Mounted
	Bunkers Park Cemetery	
199	Cemetery PTZ	Pole Mounted
202	Cemetery Side Path	Wall Mounted
203	Cemetery Main Entrance	Wall Mounted
204	Cemetary Side Entrance	Wall Mounted
	Housing Sites and Flats	
	Aragon Close	
	Aragon Close PTZ	
	Aragon Close Left	
	Aragon Close Right	
	Betty Patterson House (Hemel Town)	
405	, , ,	statia
495	betty patterson house front entrance ext	static
496	front entrance int	static
497	rear entrance int	static
498	rear entrance ext	static
	Eastwick Row (Adeyfield)	
140	Eastwick Row 45-63 Internal rear door	static
141	Eastwick Row 45-63 external rear door	Static
142	Eastwick Row 45-63 Internal front door	Static
143	Eastwick Row 45-63 lift overview	Static
144	Eastwick Row 45-63 lift covert	Static
145	Eastwick Row 68-87 external front door	Static
146	Eastwick Row 68-87- external rear door	Static
147	Eastwick Row 68-87 internal front door	Static
148	Eastwick Row 68-87 internal rear door	Static
140	Eastwick Row 68-87 lift covert	Static
150	eastwick Row 68-87 lift overview	Static
152	Eastwick Row 45-63 external front door	Static
	Elizabeth House	
491	eliszabeth house chapel st ext	static
492	chapel st int	static
493	austin place ext	static
494	austin place int	static
	Fennycroft	
184	Fennycroft Lift	Static
185	Fennycroft covert lift	Static
186	Fennycroft Front door	Static
187	Fennycroft rear door	Static
188	Fennycroft Internal rear	Static
189	Fennycroft internal front	Static
105	Gade Tower	Statie
127	Gade Tower Lift right overview	static
	-	
128	Gade Tower Lift left overview	Static
129	Gade Tower lift right covert	Static
130	Gade Tower adjacent h back	static
131	Gade Tower adjacent bin store	static
132	Gade Tower lobby right bin store	static
133	Gade Tower lobby left electric cupboard side	static
134	Gade Tower Lift	Static
	Kylna Court	
153	Kylna Court Camera 1	static
167	Kylna Court Camera 11	static

168	Kylna Court Camera 2	static
169	Kylna Court Camera 4	static
170	Kylna Court Camera 13	static
171	Kylna Court Camera 12	static
172	Kylna Court Camera 7	static
173	Kylna Court Camera 9	static
174	Kylna Court Camera 10	static
175	Kylna Court Camera 3	static
176	Kylna Court Camera 6	static
177	Kylna Court Camera 5	static
178	Kylna Court Camera 8	static
	Stationers Place (Magenta Court , Apsley)	
292	Central Driveway	static
293	Entrance	static
294	Middle Block	static
294	Far End Block	
295		static
	Phyliss Courtnage House (High Field)	
191	Entrance Internal	static
192	Entrance External	static
193	Rear Door External	static
194	RearDoor Internal	static
	Westerdale (Highfield)	
218	Rear Car Park	static
275	Rear Entrance Internal	static
283	1st Floor	static
284	2nd Floor	static
285	Front Entrance	static
286	Rear Entrance	static
287	Car Park Entry	static
288	Car Park Exit	static
289	Front Entrance Door	static
	Christopher Court (Seaton Road)	
206	Garden Internal	static
207	Scooter Shed	static
208	Entrance External	static
209	Bin Storage External	static
210	Entrance Internal	static
	Holly Tree Court (Adeyfield)	
195	Entrance External	static
196	Side Fire Exit Internal	static
197	Entrance Internal	static
198	Side Fire Exit External	static
	Leverstock Green Flats	
217	Internal Camera	static
218	External Camera	static
210	Martindale (Warners End)	Statio
120	, ,	atatia
126	Courtyard Left Hand Side	static
281	Rear Parking	static
297	Main Exit Road	static
298	Courtyard Right Hand Side	static
	Northend (Leverstock Green)	
212	Car Park	static
215	Rear Exit	static
216	Bike Shed	static
282	Car Park Entrance	static
302	Internal Entrance	static
303	1st Floor Landing	static
304	Top Landing	static
	Neighbourhood Centres	
	Adeyfield	
25	Adeyfield Queens Square Nr Jubilee Public House	Pole Mounted
27	Hammer Lane Rear Of Queens Square Shops	Wall Mounted Onto Flats
	Bellgate	
31	Junction Of Bathurst Road Bellgate Shops	Pole Mounted
32	Cambrian Way Bellgate shops Nr Community Centre	Pole Mounted
52	Camphan way bengate shops in Community Centre	

	Bennetts End	
19	Bennets End Road Infront Of Bennetts End Shops	Pole Mounted
20	leys Road Infront Of bennetts End Shops	Pole Mounted
21	Kimps Way Rear Of Bennetts End Shops	Wall Mounted On flats
296	Kimps Way Garages	Pole Mounted
	Chaulden	
57	Long Chaulden - Chaulden Shops	Pole Mounted
213	Chaulden Shops Rear	Pole Mounted
	Cupid Green	
80	Cupid Green Playing Fields	Pole Mounted
81	Redbourne Rd - Nr Texaco Petrol Station	Pole Mounted
	Grove Hill	
22	Henry Well Square Grovehill Shops	Pole Mounted
23	Rear Of Grovehill Shops Nr Community Centre	Pole Mounted
24	Rear Of Grovehill Shops Nr Health Centre	Pole Mounted
	Gadebridge	
55	Fennycroft Rd - Looking Onto Shops	Wall Mounted To Flats
56	Corner of Gadebridge Rd-Looking onto Shops	Pole Mounted
	The Heights	
34	Jupiter Drive Nr Elara House Flats	Pole Mounted
35	Saturn Way Opposite The Heights Shops	Pole Mounted
	Kings Langley	
82	Corner of Abbots Rise- Kings Langley	Pole Mounted
04	Leverstock Green	Dala Maxima d
84	Leverstock Green Rd-Corner of Malmes Croft	Pole Mounted
<b>F</b> 4	The Denes	Dala Maxima d
54 72	Corner of The Denes- Denes Shops	Pole Mounted Pole Mounted
73	The Denes Shops Warners End	Pole Mounted
62	Northridge Way- Near Warners End Community Centre	Pole Mounted
63	Rear Car Park to Stoneycroft Shops	Pole Mounted
64	Stoneycroft Shops	Pole Mounted
0.	Woodhall Farm	
	Aragon Close	Wall mounted to flats
	Splash park	
156	Splash Park Compound	Static
157	Splash park Camera 1	pole mounted
158	Splash park Camera 2	Pole Mounted
159	Splash park Camera 3	Pole Mounted
	Swallowfields	
179	Spencer Park Camera - Shops	Pole Mounted
180	Spencer Park Camera - Car Park	Pole Mounted
302	Spencer Park Playground (Argus Gardens)	Pole Mounted
303	Spencer Park Playground (Admiral Avenue)	Pole Mounted
205	Three Cherry Trees	Pole Mounted
	The Bury	
117	The Bury Stairs / hallway	static
118	The Bury Reception ?waiting Room	Static
119	The Bury Rear Door/carpark	Wall mounted
22	The Elms Lift Camera - Internal Elms	Static
33 76	Main Office - Internal Elms	Static
70	Reception - Internal Elms	Static
78	IT Suite Front - Internal Elms	Static
70 79	IT suite Rear - Internal Elms	Static
85	Lounge Area - Internal Elms	Static
86	Common Room - Internal Elms	Static
87	Interview Room 1 - Internal Elms	Static
88	Interview Room 2 - Internal Elms	Static
89	Front Stairwell - Internal Elms	Static
90	Rear Stairwell - Internal Elms	Static
91	First Floor Front - Internal Elms	Static
92	First Floor Lift Lobby - Internal Elms	Static
96	First Floor Rear - Internal Elms	Static
103	First Floor Laundry Room - Internal Elms	Static
104	Second Floor Front - Internal Elms	Static

105	Second Floor Lift Lobby	Static
106	Second Floor Rear - Internal Elms	Static
107	Second Floor Kitchen - Internal Elms	Static
108	Top Floor Front - Internal Elms	Static
109	Top Floor Lift Lobby - Internal Elms	Static
110	Basement - Internal Elms	Static
111	Elms Main Doors	Wall Mounted
112	Elms Garden	Wall Mounted
113	Elms Rear/Side	Wall mounted
155	Elms carpark LHS	Wall mounted
156	Elms car park RHS	Wall mounted
	Town Centres	
	Berkhamsted	
36	Water Lane Tesco Car Park [Berkhamsted]	Pole Mounted
38	St John's Road Car Park Nr waitrose [Berkhamsted]	Pole Mounted
39	Castle Street Opposite St Peters Church [Berkhamsted]	Pole Mounted
40	High st Junction Kings Road {Berkhamsted]	Pole Mounted
41	High St Opposite George Public House [Berkhamsted]	Pole Mounted
42	High St Junction Crossoaks Rd [Berkhamsted]	Pole Mounted
42	Berkhamsted Multi-Storey car park	Fole Mounted
219	Stair Core Level 6	Static
220	Entrance Barrier	Static
220	Stair Core 1 Level 7	Static
222	Level 1 Up Ramp	Static
222	Stair Core 2 Level 7	Static
223		Static
224	Level 2 Down Ramp Level 3 Up Ramp	Static
225	Level 4 Right Hand Side	Static
220	Level 4 Down Ramp	Static
228	Level 0 Out	Static
228	Level 2 Up Ramp	Static
230	Level 0 Rear Right Hand Side	Static
230	Level 4 Front Right Hand Side	Static
231	Stair Core 1 - Lift	Static
232	Level 2 Front Right Habd Side	Static
233	Stair Core 1 - Sliding Door	Static
254	Level 1 Down Ramp	Static
252	Stair Core 2 Fire Escape	Static
264	Stair Core 2 - Level 6	Static
265	Level 0 - In	Static
266	Exit Barrier	Static
267	Level 3 Down Ramp	Static
268	Level 2 Front Left Hand Side	Static
269	Level 5 Up Ramp	Static
203	Level 5 Down Ramp	Static
272	Level 4 Up Ramp	Static
274	Level 0 Rear Left Hand Side	Static
276	Front PTZ	Wall Mounted
277	Rear Left and Side PTZ	Wall Mounted
278	Right Hand Side PTZ	Wall Mounted
299	Stair Core 1 Level 7 PTZ	Pole Mounted
280	Stair Core 2 Level 6 PTZ	Pole Mounted
200	Hemel Hempstead Town Centre	
1	junction Marlowes Hillfield Road	Wall Mounted on NCP Car Park
2	junction Marlowes Bridge Street	Wall Mounted on Santander
2	Marlowes Pedestrian Area Nr WH Smith	Wall Mounted on WH Smith
4	Marlowes Pedestrian Area Nr Watr Fountain	Wall Mounted on Game
4 5	Marlowes Pedestrian Area Nr Rainbow Art work	Wall Mounted on Office Angles
5	Moor End Road car Park	Pole Mounted
28	Combe Street Outside Police Station	Wall Mounted On Police Station
28 8	Water Gardens Car Park South	Pole Mounted
8 9	Water Gardens Car Park South Water Gardens Car Park Centre Entrance Bridge Street	Pole Mounted
58	Water Gardens car Park Centre Entrance Bruge Street	Pole Mounted
59	Marlowes- Outside The Civic	Pole Mounted

70	Corner of Bridge Street - Taxi Rank	Pole Mounted
70	Bus Interchange - Marlowes	Pole Mounted
83	Two Waters - Opposite Evans Halshaws	Pole Mounted
93	Marlowes - B&M	Wall Mounted To B&M
94	Marlowes - Maplins	Wall Mounted To Maplins
95	Marlowes - 99p Store	Wall Mounted To 99p Store
201	Moor End Road	pole mounted
	Old Town (Hemel Hempstead)	
29	Old Town High St Car Park Rear Of St Mary's Church	Pole Mounted
30	Old Town High St Car Park Nr To Public Toilets	Pole Mounted
50	Olde Kings Arms- Old Town High Street	Wall Mounted to Kings Arms
51	Nr Old Bell Public House - Old Town	Wall Mounted to Bell Public House
52	Opposite Saffron Restaurant- Old Town	Wall Mounted To Barber Shop
53	Corner of Fletcher Way - Old Town	Pole Mounted
60	Leighton Buzzard Rd-Looking onto Gadebridge Park Toilets	Pole Mounted
61	Leighton Buzzard Rd-Looking onto Gadebridge Park Car Park	Pole Mounted
114	Leighton Buzzard Rd - Gadebridge Park Skate park	Pole Mounted
121	The Bury - Gate Side	Pole Mounted
122	The Bury Rear	Pole Mounted
502	old town cellar bar	static
503	entrance lobby	static
504	public footpath	static
	Tring	
43	High Street Nr memorial gardens [Tring]	Pole Mounted
44	High Street Nr Brown&Merry estate agents [Tring]	Wall Mounted To Flats
45	High Street Opposite The Baptist Church [Tring]	Pole Mounted
46	Frogmore Street Junction High Street [Tring]	Pole Mounted
47	Frogmore St Car Park Nr Black Horse public Hse [Tring]	Pole Mounted
48	Forge Car Park Off High Street [Tring]	Pole Mounted
	Underground Car Park (Water Gardens)	
10	Water Gardens Under ground Car Park	
11	Water Gardens Under ground Car Park	
12	Water Gardens Under ground Car Park	
13	Water Gardens Under ground Car Park	
14	Water Gardens Under ground Car Park	
15	Water Gardens Under ground Car Park	
16	Water Gardens Under ground Car Park	
17	Water Gardens Under ground Car Park	
97	Combe Street Entrance - Water Gardens Car Park	Static
98	Combe Street Exit - Water Gardens Car Park	Static
99	Leighton Buzzard Rd Exit - Water gardens Car Park	Static
100	Leighton Buzzard Rd Entrance - Water Gardens car Park	Static
101	Bridge Street Entrance - Water Gardens car Park	Static
102	Bridge Street Exit - Water Gardens Car Park	Static
	Water Gardens Car Park	
18	water Gardens North Upper deck	Pole Mounted
72	Water Gardens South Upper Deck	Pole Mounted
126	Water Gardens Walkway	Static
451	Water Gardens A	Static
452	Water Gardens A2	Static
453	Water Gardens B	Static
454	Water Gardens B2	Static
455	Water Gardens C	Static
456	Water Gardens C2	Static
457	Water Gardens D	Static
458	Water Gardens D2	Static
459	Water Gardens Upper A	Static
460	Water Gardens Upper Ramp	Static
461	Water Gardens Upper	Static
462	Water Gardens Upper C	Static
463	Water Gardens Upper B	Static
464	Water Gardens Upper D	Static
467	Water Gardens Help point	Static
	Woodwells	
65	Main Gate Woodwells	Static
66	Main Gate Woodwells	Pole Mounted

67	Park Centre-Woodwells	Pole Mounted
68	Main Road Centre- Woodwells	Pole Mounted
69	Main Road Bottom	Pole Mounted
74	Bottom Fence - Woodwells	Pole Mounted
75	Wash Area - Woodwells	Static

Adpro Sites (All Internal Cameras)	Number of cameras
Able House	4
Axis Point - Maylands Business Contact Centre	7
Barleycroft	4
Berkhamsted Cemetery	4
Bellgate Flats Highfield	6
Belswains School	4
Bennetts End Flats Barnacres	2
Chaulden Adventure playground	5
Compass Point	4
Cranford	6
Douglas Gardens (Berkhamsted)	6
Dudley House (Bovingdon)	4
Emma Rothschild Court (Tring)	6
Extreme Connections	3
Florence Longman	4
Gilbert Burnet House	3
Dacorum Sports centre	2
Leys Rd Hostel	5
Oaklawn	6
Pelham Court 1-37	9
Pelham Court 38-75	8
Pond Close (Tring)	4
Saturn Way	5
The Chilterns (Berkhamsted)	13
The Heights Flats Highfield	6
Two Beeches	6
Victoria Hall (Tring)	4
William Crook House	4
Woolmer Drive	8

Total Genetec Cameras : 340 Total AdPro Cameras: 152

Total Camera Number - 492