



CCTV Code of Practice

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1. Introduction and Objectives

1.1 Introduction

Merseytravel owns and operates a Closed Circuit Television ('CCTV') System throughout the Merseytravel estate, with images being monitored and recorded either in the Mersey Tunnels Police Combined Control Centre or, in the case of locations such as the Mersey Ferries, on site.

1.2 This document, along with individual systems Codes of Practice, are designed to give clear guidelines on Merseytravel's use of CCTV and to protect Merseytravel and its CCTV operators from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system.

1.3 This policy covers the use of CCTV equipment and the gathering, storage, use and disposal of visual data. This policy applies to all staff employed by Merseytravel and should be the standard expected from any external agencies or persons who operate CCTV systems on its behalf.

1.4 Definitions

Data Controller: Merseytravel

Owner: Merseytravel

System Administration Manager: Chief Police Officer/Police Operations Manager, Mersey Tunnels Police, Merseytravel, who will have day to day responsibility for the system.

System Ownership: Merseytravel (See Appendix 1 for detail)

1.5 Objectives of the System

The objectives of the CCTV system are to reduce crime and the fear of crime by helping to provide a safer environment for those people who visit and work within Merseytravel premises or assist staff to carry out their duties.

The system will provide the Police and partner agencies with assistance to detect deter and prevent crime. It will:

- help identify, apprehend and prosecute offenders;
- provide the Police with evidence to enable criminal and civil proceedings to be brought to the courts;
- and help to maintain public order.

In addition the system will enable traffic management, crime detection, crime prevention, public and contractors to be effectively managed by Merseytravel.

The system will be operated at all times with due regard for the privacy of individuals and will not be used to invade the privacy of any individual in residential, business or other private premises, buildings or land.

The system will not be used to harass any person or group of persons going about their business in a lawful way.

Any user found to have contravened the privacy of an individual in breach of this Code of Practice, will be subject to the disciplinary procedures of Merseytravel.

1.6. Legislation

In addition to Merseytravel policies, procedures, guidelines and Codes of Practice issued by the Information Commissioner and Surveillance Commissioner, CCTV and its operation are subject to legislation under:

- 1.6.1 The Data Protection Act (DPA)
- 1.6.2 The General Data Protection Regulation (GDPR)
- 1.6.3 The Human Rights Act 1998 (HRA)
- 1.6.4 The Freedom of Information Act 2000 (FOIA)
- 1.6.5 The Protection of Freedoms Act 2012

2. Merseytravel Code of Practice

2.1 The key objectives of the system are to:

- provide public reassurance and to deter crime;
- detect, prevent or reduce the incidence of all crime;
- improve general security in the area, both in terms of personal safety and the security management of buildings and premises;
- reduce graffiti, vandalism and other criminal damage;
- reduce the level of disorder and minor crime in and around the premises;
- improve communication between staff, contractors and Police patrols in the areas covered and assist in the policing of the area;
- assist the Police with specific operations aimed at either catching criminals or intelligence gathering and in the event of acts of terrorism or civil emergencies;
- assist in traffic management by monitoring traffic accidents or obstructions thereby preventing or alleviating interruptions to traffic flow;
- monitor bus services to determine the level of service;

- monitor contractors to provide information on their location for their security and protection;
 - monitor contractors attendance and adherence to their conditions of contract;
 - protect Merseytravel from spurious claims of negligence;
 - assist with the surveying of the premises to ensure the property is maintained in good order;
 - allow Merseytravel to claim the cost of damage to its premises by others;
 - allow Merseytravel to investigate incidents involving both staff and members of the public in and around its premises.
- 2.2 Any member of the General Public who approaches Merseytravel requesting to view the content of any CCTV images regarding any incident will be advised to contact Mersey Tunnels Police Combined Control Centre via email (MTP.CCTV@merseytravel.gov.uk) who will, together with the Senior Information Management Officer, ascertain the validity of the request. Where a member of the public specifically asks to see CCTV images of themselves, they should be advised of the subject access provisions under the DPA or the GDPR.
- 2.3 Any requests from the Emergency Services or Law Enforcement Agencies for CCTV images must be made on the agreed standard form, signed by a Police Officer and submitted to Mersey Tunnels Police Combined Control Centre via email (MTP.CCTV@merseytravel.gov.uk). The Requestor will also sign and accept responsibility as part of their obligations under the DPA or the GDPR for any image released into their care.
- 2.4 All internal requests for access to CCTV images for business reasons, whether of live or recorded images, must be made on the agreed standard Police form. The individual collecting the images will also sign and accept responsibility for any data released into their care. The procedure for internal requests for HR purposes is addressed at Clause 8.
- 2.5 All CCTV images provided by Merseytravel shall remain property of Merseytravel at all times and at no time is the copyright transferred to the recipient.
- 2.6 No CCTV shall intentionally overlook and view into private premises without receiving prior consent from the occupiers of those premises.

3. **Responsibility of the Operators of the System**

- 3.1 The Operators of the system shall have prime responsibility for:
- a) compliance with the purpose and objectives of the system;
 - b) operation and security of the system;

- c) the protection of the interests of the public and of the individual as far as is practical;
- d) the compliance with this Code of Practice;
- e) compliance with all legislation pertaining to the use of the system.

4. **Statement of Purpose**

4.1 Purpose

The purpose of this document is to state how Merseytravel intend to use the CCTV System to meet the objectives and principles outlined in Clause 2.

4.2 General Principles of Operation

The CCTV System will be operated fairly, within the law and only for the purposes for which it was established and which are identified within this code or which are subsequently agreed in accordance with this code.

The CCTV System will be operated with due regard to a general right to respect for an individual's private and family life and their home, as set out in Article 8 of the HRA.

The public interest in the operation of the CCTV system will be safeguarded by ensuring the security and integrity of operational procedures.

Throughout this Code of Practice it is intended, as far as reasonably possible, to balance the objectives of the CCTV System with the need to safeguard the individual rights. Every effort has been made throughout the Code to indicate that a formal structure has been put in place, including a complaints procedure, by which it can be identified that the system is not only accountable but is also seen to be accountable.

Participation in the system by any organisation, individual or authority assumes an agreement by all such participants to comply fully with this code and to be accountable under the Code of Practice.

4.3 Monitoring and Recording Facilities

The CCTV System uses a number of digital network video recorders located at Merseytravel's four Data Centres. These devices record all camera feeds from the Merseytravel system according to network design and architecture.

Access to recorded data is directly linked to Merseytravel IT Active Directory permissions via individual user credentials. The purpose of this is to audit which operator has bookmarked specific footage. Recording of footage will be heavily restricted to a small number of Officers (currently Mersey Tunnels Police). Viewing of live footage will only be allowed by appropriate officers following appropriate justification and duly recorded in the CCTV Data Management Viewing Register without exception.

On our Mersey ferry vessels CCTV data is captured using standalone digital video recorders located on each vessel. Access to these devices is secure and subject to password protection of recorded footage. Similar principals apply to the recovery of CCTV data in every way as summarised within this document.

CCTV data at Newton-Le-Willows train station Park & Ride is captured using standalone digital video recorders. Access to these devices is secure and subject to password protection of recorded footage. Similar principals apply to the recovery of CCTV data in every way as summarised within this document.

4.4 Training

Staff will be suitably trained and authorised visitors will not have access to the monitoring facility without an authorised member of staff present at all times.

4.5 Processing and Handling Recorded Material

No recorded material whether recorded digitally, in analogue format or as a hard copy video print, will be released unless in accordance with this Code of Practice and relevant legislation.

4.6 Changes to the Code

This Code of Practice will be subject to regular review to ensure that it reflects best practice and responds to changes brought about by legislation. Any major changes to the Code of Practice will take place only after consultation with and upon agreement of Merseytravel. Minor changes will be made by the appropriate System Administration Manager, in conjunction with the Senior Information Management Officer, on behalf of Merseytravel.

A major change is one which will have a significant impact upon the Code of Practice or upon the operation of the CCTV System. A minor change is one which, for example may be required for clarification or which arises as a result of technical changes to the CCTV system and will not have any major implications.

4.7 Breaches of the Code of Practice and Security

Prime responsibility for the Code of Practice and for security surrounding the system rests with Merseytravel.

This responsibility includes ensuring that breaches are investigated and remedied in accordance with Merseytravel's Data Protection Policy.

Responsibility for security on a day to day basis rests with the System Administration Manager. Major breaches of the Code of Practice will be investigated by Merseytravel's Head of Internal Audit or their representative in conjunction with the Senior Information Management Officer, and they shall have responsibility for making recommendations to remedy any major breach which is proved. The Senior Information Management Officer will be responsible for the reporting of breaches to the Information Commissioner when appropriate. If a criminal offence is disclosed then the matter will be referred to the relevant Law Enforcement Agencies.

5. Privacy and Data Protection

5.1 Public Concern

Although the majority of the public at large may have become accustomed to "being watched" those who do express concern do so mainly over matters pertaining to the processing of the information (or data) i.e. what happens to the material that is obtained.

All personal data obtained by virtue of the System shall be processed fairly and lawfully and in particular shall only be processed in the exercise of achieving the stated objectives of the System. In processing personal data a person's right to respect for his or her private and family life and their home will be respected in accordance with Article 8 of the HRA.

The processing, storage and security of the data will be strictly in accordance with the requirements of the DPA or the GDPR and additional locally agreed procedures.

Cameras will not be used to look into private residential property, unless pursuing a suspect and this is considered to be in the interests of the private residents. Where the equipment permits it "privacy zones" will be programmed into the System, as required, in order to ensure that the interior of any private residential property within range of the System was not surveyed by the cameras. If such 'zones' cannot be programmed the operators will be specifically trained in privacy issues.

5.2 Data Protection Legislation

On 25th May 2018 the DPA will be replaced by the GDPR as the UK's data protection legislation.

The operation of the System has been notified to the Information Commissioner's Office in accordance with the requirements of the DPA. Merseytravel's registration number is Z741948X.

The "data controller" for the System is Merseytravel and day to day responsibility for the data will be devolved to the System Administration Manager.

Prior to 25th May 2018 all personal data will be processed in accordance with the principles contained in Schedule 1 of the DPA, which state that personal data will be:

- 1) processed fairly and lawfully;
- 2) processed for limited purposes and in an appropriate way;
- 3) adequate, relevant and not excessive for the purpose;
- 4) accurate and up to date;
- 5) not kept longer than necessary for the purpose;
- 6) processed in line with data subjects' rights;
- 7) protected by appropriate technical and organisational measures;
- 8) not transferred outside the European Economic Area without adequate protection.

After 25th May 2018 all personal data will be processed in accordance with the principles contained in Article 5 of the GDPR, which state that personal data will be:

- a) processed fairly and lawfully;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, up to date;
- 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;
- 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

At the time of this Code's revision, the Data Protection Bill was awaiting its second hearing in the House of Commons. When this becomes legislation it will work alongside the GDPR, and will implement the EU's

Law Enforcement Directive and cover areas such as the interaction between Data Protection legislation and the FOIA.

5.3 Requests for Information (Subject Access)

Any request from an individual for the disclosure of their personal data which they believe is recorded by virtue of the System should be directed in the first instance to the Mersey Tunnels Police Combined Control Centre via email (MTP.CCTV@merseytravel.gov.uk). Mersey Tunnels Police without exception will then inform the Senior Information Management Officer if any footage is held, who will respond to the requester.

The principles of the DPA or the GDPR and the FOIA shall be followed in respect of every request.

If the request cannot be complied with without identifying another individual, permission from that individual must be obtained unless it is reasonable in all the circumstances to comply with the request without the consent of that individual.

Any person making a request must be able to satisfactorily prove their identity and provide sufficient information to enable the data to be located.

6. Accountability and Public Information

6.1 The Public

For reasons of security the confidentiality access to the Mersey Tunnels Police Combined Control Centre is restricted in accordance with the Code of Practice.

A member of the public wishing to register a complaint with regard to The System may do so by contacting Merseytravel. All complaints shall be dealt with in accordance with the Merseytravel Complaints Procedure, a copy of which may be obtained from the Merseytravel Customer Development Team. Any performance issues identified will be considered under the organisations Disciplinary Procedures to which all employees, including CCTV personnel, are subject.

Concerns about Merseytravel's use of personal information can be directed to DPO@merseytravel.gov.uk.

6.2 Public Information

A copy of this Code of Practice shall be published on the Merseytravel website.

6.3 Signs

Signs (see Appendix 2) will be placed in the locality of the cameras and at main entrance points to the relevant areas. The signs will indicate:

- the presence of CCTV monitoring;
- the 'Ownership' of the System;
- contact e-mail address for the system (MTP.CCTV@merseytravel.gov.uk)

6.4 Fair Processing Notice

The GDPR requires certain additional information to be communicated to the public when their information is collected.

The full Fair Processing Notice for Merseytravel's CCTV system can be found at Appendix 5.

7. **Assessment of the System and Codes of Practice**

7.1 Evaluation

The System will, periodically, be evaluated to establish whether the purposes of the System are being complied with and whether objectives are being achieved in addition to compliance. The Site Operational Assessments for all areas will be completed by the manager responsible and all justifications will be forwarded to the System Administration Manager for review in conjunction with the Senior Information Management Officer.

7.2 Monitoring

The System Administration Manager/Mersey Tunnels Police Combined Control Centre Operators will accept day to day responsibility for the monitoring and operation of the System and the implementation of this Code of Practice.

7.3 Audit

There will be regular audits of the operation of the System which may be in the form of irregular spot checks which may include examination of the Mersey Tunnels Police Combined Control Centre records, media histories, the content of recorded materials and site visits across the estate by the System Administration Manager or their designated representative.

8. **Human Resources**

8.1 **CCTV Operators**

Combined Control Centre Operators/CCTV Police Data Management Administrators will not be permitted to use the CCTV system until they have received suitable training and are familiar with this Code of Practice.

Every person involved in the management and operation of the System will be personally issued with a copy of the Code of Practice. They will be required to sign confirming that they fully understand their obligations to adhere to this Code of Practice (issued electronically via Policy Insight - <http://insight-cmb-01/UserHome/Policies/Default.aspx>).

8.2 **Discipline**

Every individual with any responsibility under the terms of this Code of Practice and who has access to the System will be subject to the Merseytravel disciplinary procedure. Any breach of this Code of Practice or of any aspect of confidentiality will be dealt with in accordance with the relevant disciplinary procedure.

8.3 **Declaration of Confidentiality**

Every individual with any responsibility under the terms of this Code of Practice and who has any involvement with the System to which they refer will be required to sign a declaration of confidentiality (See Appendix 3).

8.4 **Disciplinary Proceedings**

CCTV footage captured by the system may be used for the purposes of Merseytravel staff disciplinary investigations in accordance with the Disciplinary Policy. When required, Human Resources will request the footage from the Mersey Tunnels Police Combined Control Centre.

9. **Control and Operation of Cameras**

9.1 **Guiding Principles**

Any person operating the cameras will act with utmost integrity and respect at all times without exception.

9.2 **Maintenance of the System**

To ensure compliance with the Information Commissioner's Code of Practice that images recorded continue to be of appropriate evidential quality, the Merseytravel CCTV System shall be maintained by the

Merseytravel Asset Management Systems Engineers, with technical support for the network provided by Merseytravel's IT department.

The maintenance programme will make provision for regular/periodic service checks on the equipment which will include cleaning of any 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 quality.

The maintenance will also include regular periodic overhauls of all the equipment and replacement of equipment which is reaching the end of its serviceable life. Asset Management will provide the System Administration Manager and Senior Information Management Officer a maintenance schedule annually verifying all actions have been completed.

In addition, IT and Asset Management Resource Planners will provide an bi-monthly reports to the System Administration Manager and Senior Information Management Officer detailing any CCTV-related faults that have been reported, what actions have been taken to address the fault and if any issues remain outstanding.

10. **Access Arrangements and Security of Mersey Tunnels Police Combined Control Centre and CCTV Data Management Offices**

10.1 Access and security arrangements to the Mersey Tunnels Police Combined Control Centre shall as a minimum comply with the following:

- access to the Mersey Tunnels Police Combined Control Centre & CCTV Data Management Offices is strictly controlled and only those persons on legitimate business are allowed access;
- a detailed record will be maintained of visitors to the Mersey Tunnels Police Combined Control Centre & CCTV Data Management Offices and access is only allowed after formal identification has taken place;
- access for visitors to view the system will only be permitted by an Authorised Officer and controlled at all times.

11. **Management of Recorded Material**

11.1 Principles

For the purpose of this Code 'recorded material' means any material recorded by or as the result of technical equipment which forms part of the System but specifically includes images recorded digitally or on hard drive or by way of DVD copying including prints.

Every recording on hard drive or on DVD obtained by using the System has the potential of containing material that may need to be admitted in evidence at some point during the period of its retention.

Recorded material will not be copied, sold, otherwise released or used for commercial purposes or for the provision of entertainment or otherwise made available for any use incompatible with this Code of Practice.

Information will be made available for traffic and transport monitoring, management and information purposes and those cameras which will be circulated to INRIX.

12. **Digital Image Recording Procedures**

12.1 Adhering to the agreed management and operational procedures is crucial if the digital recordings produced are to be of sufficient evidential value and quality that they can be used for evidence to be produced in court.

Time lapsed digital images are automatically recorded and are kept for 30 days on the hard drive of the recording equipment after which time the images will be overwritten.

For evidential purposes each recorded image downloaded should have the correct time and date automatically embossed on it, therefore it is essential that Operators quality assure data.

If a request for access to recorded images is made within the 30 days then only copies of the images that have been specifically requested can be "bookmarked".

All data discs are appropriately referenced and marked with a unique disc reference.

12.2 **Digital Recording & Copying Procedure**

On receiving a request to view a digital recording of a particular incident, the following process should be followed:

To preserve the continuity of evidence an entry will be created on the CCTV database for any copy of digital recording made or saved onto the System thereby creating a unique incident reference number.

The report should include the following:

- name, rank or title of the person requesting the copy;
- organisation that the person represents;
- incident type e.g. assault, theft etc.;
- date time and location of the incident;

- any additional information applicable.

Each digital image recording released should be clearly identified with the relevant incident report number, date and time and date of the incident.

It is important to stress to the recipient of digital image recordings that the images will at all times remain the copyright of Merseytravel. Therefore no images should be released either wholly or partially to a third party without the written consent of Merseytravel. A record of all data released will be kept for a period of 2 years.

- 12.3 Any viewings of live or recorded images will be entered onto a CCTV Audit register. This will be updated by the person(s) authorising and include details of all camera names viewed, date, time and the purpose of viewing.

System Owners

Merseytravel
PO Box 1976
Liverpool
L69 3HN

Tel: 0151 330 1679
Minicom: 0151 330 1367
Email: MTP.CCTV@merseytravel.gov.uk

Responsibilities

- Asset Management and IT will ensure the provision and maintenance of all equipment forming part of the Merseytravel CCTV System in accordance with contractual arrangements which the owners may from time to time enter into. This will ensure service availability and compliance.
- All appropriate internal stakeholders must maintain close liaison with the System Administration Manager.
- Ensure the interests of the 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 and this Code of Practice.



MTP.CCTV@merseytravel.gov.uk

Declaration of Confidentiality

I, am employed by Merseytravel to undertake monitoring of the Merseytravel CCTV System.

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 Merseytravel CCTV 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 Merseytravel 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).

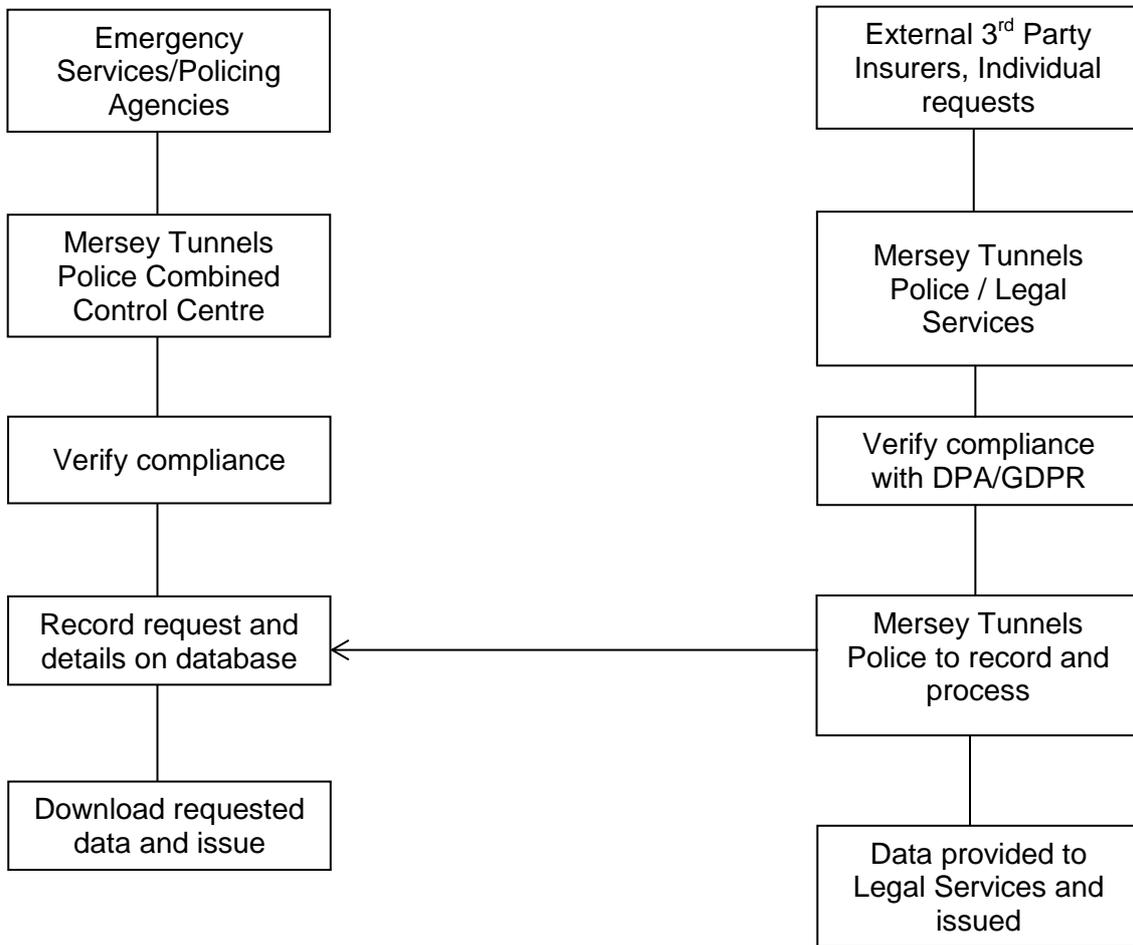
In appending my signature to this declaration, I agree to abide by the Code of Practice at all times. I also understand and agree to maintain confidentiality in respect of all information gained during the course of my duties, whether received verbally, in writing or any other media format – now or in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

Signed: Print:

Witness: Position:

Dated:

CCTV Request Handling Flowchart



Merseytravel CCTV Fair Processing Notice

Identity and contact details of the controller and where applicable, the controller's representative) and the data protection officer

Merseytravel is the 'controller' for your personal information. This means that we decide the purpose and means of how the data captured by the CCTV system is processed.

If you have any questions about how your information is being used you can contact Merseytravel's Data Protection Officer at

DPO@merseytravel.gov.uk

0151 330 1679

1 Mann Island, Liverpool, L69 3HN

Purpose of the processing and the legal basis for the processing

The CCTV system is used by Merseytravel as outlined in Clause 2.1 of this Code. We are able to do this as part of our legal obligations as an employer and as it is necessary in the exercise of official authority vested in Merseytravel by the Transport Act 1968 and the County of Merseyside Act 1980.

Description of the categories of personal data

The categories of information being processed include your image.

The CCTV system does not process any 'special categories' personal data.

Any recipient or categories of recipients of the personal data

Your information will be shared as allowed by the GDPR and the Data Protection Bill with parties such as the Police and solicitors for the purposes of criminal investigation and legal proceedings.

Details of transfers to third country and safeguards

Your personal data will not be transferred outside the European Economic Area.

Retention period or criteria used to determine the retention period

The CCTV footage will be kept for a period of 21 calendar days from the date of capture. If a request is received within this time to "bookmark" the footage, this will be retained for a period of three months. When the footage is burned to disc for disclosure, a master copy will be retained. For Crown Court or criminal cases the master copy is retained for seven years due to the legal requirement to retain related information. For all other disclosures a master copy is retained for one year. This retention has been determined by Merseytravel's business need.

The existence of each of data subject's rights

The GDPR provides you with the following rights when it comes to your personal data:

- The right to be informed how your personal data is being processed
- The right of access to the personal data we hold about you, which includes providing copies of the information to you within one month of a request. We may charge a reasonable fee to provide this information based on our administrative costs of responding (i.e. photocopying, postage, etc.).
- The right to rectification of any incorrect or incomplete data we hold about you
- The right to erasure, also known as 'the right to be forgotten', where
 - Your information is no longer required for the purpose it was collected
 - You withdraw your consent
 - You object to Merseytravel processing your information (and there is no overriding legitimate interest for continuing the processing)
 - Merseytravel has breached the GDPR when processing your data
 - There is a legal obligation to delete the data (such as a court order)
- The right to restrict processing, which limits what Merseytravel can do with your information
- The right to data portability, where any automated processing of your information based on your consent or as part of a contract is made available for your reuse
- The right to object to direct marketing or any processing based on the performance of a task in the public interest/exercise of official authority or for the purposes of scientific/historical research and statistics.
- Rights in relation to automated decision making and profiling, where a decision made by a computer has a legal or significant effect on you.

For further details, or to exercise any of your rights, contact the Data Protection Officer.

DPO@merseytravel.gov.uk

0151 330 1679

1 Mann Island, Liverpool, L69 3HN

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint regarding the processing of your personal data to the UK's supervisory authority, the Information Commissioner, who can be reached using the details below:

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire SK9 5AF
www.ico.gov.uk
0303 123 1113