Kempsford Parish Council (KPC)- Statement of adherence to the Biometrics & Surveillance Camera Commissioners' (BSCC) Codes of Practice Guidelines

Introduction

Although primarily concerned with video and CCTV cameras and general surveillance of the law-abiding public, UK law restricts the proliferation of public facing cameras primarily through the Protection of Freedoms Act.

 Any public facing camera (even one only taking stills of offences), falls within the definition of a Surveillance Camera.

KPC's Community Speed Detecting Camera System (CSDCS), (Autospeedwatch)) concerns itself with vehicles (not identifiable people) but nonetheless the guidelines apply.

Under the Protection of Freedom Act 2012 (PoFA), the Biometrics & Surveillance Camera Commissioner (BSCC, formerly SCC) for England and Wales provides statutory oversight of police and local authorities and parish councils (defined as relevant authorities in PoFA).   Therefore, as a parish council installer and operator of CSDC units KPC needs to affirm that it is familiar and compliant with the act and the corresponding BSCC's Surveillance Camera Codes of Practice.

Autospeedwatch Limited has been independently assessed and found to be compliant with the code. (*Autospeedwatch Limited* compliance certificate attached)

As the installer and user of the *Autospeedwatch Limited* system Kempsford PC must also comply with the code.

The Guiding Principles

The Code of Practice has 12 <u>guiding principles</u>.

Kempsford PC- Statement of adherence to the Biometrics & Surveillance Camera Commissioners' (BSCC) 12 Guiding Principles

As the installing authority, QPC is aware of the codes of practice, and undertakes to meet them fully as declared here

1	1.1 What's your system for? *KPC's Community Speed Detection Camera System (CSDC) is for the improvement of community safety through the reduction of excessive speeding, in collaboration with Gloucestershire Constabulary as a part of their Community Speed Watch Camera Scheme 2022.*
	1.2 Do you review its use? *KPC reviews the need for the system to continue to be active on at least an annual basis.*
2	2.1 Have you carried out a privacy impact assessment? Camera locations have been individually assessed to ensure that they do not overlook or intrude in any way with public privacy (See QPC Data Protection Impact Assessment – Appendix 1). Each camera points to the road surface immediately in front of their location thus ensuring complete avoidance of privacy impact to others e.g., avoiding properties, pedestrians, play areas, etc. The cameras take a still image but only when activated by a vehicle exceeding a pre-set minimum threshold. This ensures only the rear view of a vehicle exceeding the legal speed limit is captured. No persons or other private property is included in the captured image.
	2.2 Do you publish your privacy impact assessment? *The KPC Privacy Impact Assessment (PIA) Statement is as in 2.1 above. KPC makes this Statement publicly available upon request.*
3	3.1 Do you have signage in place to say surveillance is taking place? *Authorised Advisory signage, supplied and installed by Gloucestershire Constabulary, is installed at each of the village access roads.* *Each sign includes the relevant contact details.*
	3.2 Is there a published point of contact for people to raise queries or complaints with? *Yes the advisory signs provide contact details and the Parish Council has a complaints Policy which is available on it's website.*
4	4.1 Who's responsible for your system? *KPC delegates operational responsibility to its Clerk as Data Controller and Community Speed Watch Councillor, who works in accordance with licensing requirements specified by Gloucestershire County Council and under the guidance and in compliance with the requirements as specified by Gloucestershire Constabulary and in conjunction with Autospeedwatch Limited.*
	4.2 Are your staff aware of their responsibilities? *KPC 's Clerk and designated Councillor are aware of their responsibilities to protect privacy under the Protection of Freedoms Act and are familiar with the Surveillance Camera Codes of Practice.*
5	5.1 Do you have clear policies and procedures in place? *KPC has produced and approved its Policy addressing the deployment and operation of CSDCS.* *KPC has undertaken and produced a Data Protection Impact Assement (DPIA) in accordance with the requirements of the office of the BSCC* *Both documents are a matter of record held by the Parish Clerk*
	5.2 Do your staff know what your policies and procedures are? *KPC undertakes to include its SCDCS in the induction and training programmes of new councillors, staff and volunteers as appropriate*
6	6.1 How long do you keep images/information? *Coordinators and validators are limited to the minimum information required to perform their Community Speedwatch function. All information provided by the system remains the property of Autospeedwatch Limited.*

	Information is made available to community appointed coordinators, validators and to the police according to their access privilege. This information is provided by secured account access from Autospeedwatch Limited servers based in Maidenhead and Milton Keynes within the UK. *None of the offence information stored within the AutoSpeedWatch system directly identifies individuals.* *Images of vehicles are kept for 12 months before being deleted from the Autospeedwatch Limited system.* *Data associated with individual vehicles is kept on the Autospeedwatch Limited servers for up to three years. Meta data of the system is kept indefinitely.*
	6.2 How do you make sure images/information is deleted once they're no longer needed? *Scripted automated processes installed by Autospeedwatch Limited remove information from the secure server when the information is no longer needed.*
7	7.1 Do you have a policy on who has access to the stored information? *It is the Policy of KPC that AutoSpeedWatch limited provides secure access only to those authorised by KPC in accordance with their role privileges. Three levels of access privilege are available:* 1. ***Managers*** *(normally restricted to police area managers) can see, edit and delete speeding offence records across all Autospeedwatch Limited CSDCS systems within their area.* 2. ***Coordinators*** *can see, edit, report on, and delete speeding offence records across all the roadside units in their own CSDCS system.* 3. ***Validators*** *help the coordinator, by manually checking and validating individual speeding records.*
	7.2 Do you have a policy on disclosure of information? It is the Policy of KPC that its authorised coordinator(s) and verifier(s) must not disclose the VRN's of any vehicle included in the CSDCS to members of the public under any circumstance. *Autospeedwatch Limited Terms and Conditions require KPC not to copy, replicate, or distribute information to others.*
8	8.1 Do you follow any recognised operational or technical standards? As an approved and authorised participant of the Community Speed Watch (Camera) Scheme 2022 as directed and administered by Gloucestershire Constabulary, KPC operates its CSDCS in accordance with their operating procedures as proscribed and amended from to time.
9	9.1 Do you make sure that the images captured by your system are caught securely? *Yes. KPC's CSDCS captures each recorded offence and sends them across securely encrypted internet links (to banking encryption standards) to Autospeedwatch Limited secure servers. It does not store the information locally.*
	9.2 Are only authorised people given access to the images? *Only registered users are able to retrieve speeding offence records and strictly in accordance with the access privileges granted to them by KPC.*
10	10.1 Do you evaluate your system regularly to make sure it's still required? *QPC reviews the continuing need for SCDC at least annually.*
	10.2 Could there be an alternative solution to a surveillance camera system? *Traditional by-the-roadside Community Speed Watch is an alternative, but has abuse and accident risks, and produces less useful information for the police to use to tackle speeding. Community Speed Watch sessions are still undertaken to support awareness and monitor other areas of the Parish..*
11	11.1 Can the criminal justice system use the images and information produced by your surveillance camera system? *Not for evidence but for information only. As with traditional Community Speed Watch schemes the information gathered is not for the purposes of evidence in a court of law.*
	11.2 Do you have a policy on data storage, security and deletion? *KPC's access to the information is in accordance with privileges protocol described above. Information is stored on the Autospeedwatch Limited servers in complance with its data deletion storage and security protocols*
12	12.1 Do you use any specialist technology such as ANPR, facial recognition, Body Worn Video (BWV) or remotely operated vehicles (Drones)? *No. AutoSpeedWatch is not an intrusive ANPR System (a system that automatically reads the licence plates of all*

vehicles). It does, however, offer an optional tool to help validate the licence plate of an offending vehicle (i.e. after an offence has been recorded) as part of the manual validation process. Sometimes this can help speed up the manual record-checking process. It does not increase the amount of intrusion, or the number of records recorded. This tool can be switched on or off by the CSW coordinator as required.

12.2 Do you have a policy in place to ensure that the information contained on your database is accurate and up to date?
KPC's CSDCS information is held by Autospeedwatch Limited who's systems ensure that records are individually time-stamped. Aged records are automatically (without human involvement) removed according to policy.