

Appendix B – Significant Changes to the Code of Practice

Section	Subject	Change
Throughout	Legislation	All references to legislation have been updated.
Throughout	Surveillance Camera Commissioner (SCC)	References to the SCC / Information Commissioner have been updated.
1.1.2 2.2.3	Body worn cameras (BWC)	The Code now includes references to BWC and how BWC data is managed as part of the overall system. Related to this, a specific section relating to PPASB has been removed, as their work, including use of BWC, is covered by the Code more generally.
1.3 (previously 1.4)	Aims of the CCTV System	<p>The aims of the service have been refined:</p> <ul style="list-style-type: none"> a) To enhance community safety b) To help secure a safer environment for those people who live in, work in and visit the areas c) The detection, deterrence and prevention of crime such as: <ul style="list-style-type: none"> Providing assistance in the prevention of crime. Deterring and detecting crime. Helping to identify, apprehend and prosecute offenders. Providing the Police with evidence to take criminal action in the courts. d) To assist in aspects of traffic management e) To assist in the delivery of City Council services f) To reduce the fear of crime and to provide reassurance to the public

		<p>g) To assist in the improvement of the environment and the security of the areas, to make the city a more attractive area to live, shop, work or socialise in.</p> <p>h) To help with the communication and operational response of Police patrols in and around the city</p> <p>i) To assist in the finding of missing people and assist when searching for vulnerable people and high-risk individuals threatening suicide.</p> <p>This is not a material change to the previous version but is more clearly stated. Although not representing a significant change it is included here as the Aims of the Service are such an important part of the Code of Practice.</p>
2.2.1 (previously 2.3)	Area Coverage	<p>The area covered has been updated to</p> <p>Lincoln City Centre - Uphill and Downhill, Transport Hub, St Marks Shopping Centre, some public parks, residential areas on the edge of the city centre (Park ward, Abbey ward, Carholme ward and Castle ward), some city centre car parks, some council offices (public areas) and Housing properties, Yarborough Leisure Centre, Birchwood Leisure Centre, Bracebridge Heath recreation field and Forum Centre North Hykeham.</p> <p>This reflects new sites at: 'Safer Streets' residential areas Birchwood Leisure Centre Bracebridge Health recreation field</p> <p>Better describes provision at: Forum Centre, North Hykeham</p>

		<p>Transport Hub</p> <p>Summarises a number of sites as ‘car parks’, ‘public parks’, ‘council offices’ and ‘housing properties’ instead of listing individual sites, and lists ‘Lincoln City Centre – uphill and downhill’ rather than list separate parts of the city centre. The removal of specific site names makes future expansion (or removal of cameras) possible without having to update the Code each time.</p>
2.2.5 3.2.3 5.1.3	Data Protection Impact Assessments (DPIA)	These sections refer to the need for DPIAs to be carried out, in accordance with the GDPR which came in to force in 2018.
2.2.6	Internal and external customers	This section acknowledges that there are internal and external customers who pay for the provision of cameras, maintenance, monitoring and management of data.
(old version 2.4.6)	Volunteers	This has been removed. The presence of volunteers in the Control Room was not operationally practical, and very complex to arrange given the very limited opportunities for it to be of practical benefit.
2.5.2 (previously 2.7.2)	Minor changes to the Code	Previously minor changes to the Code could be authorised by the Chief Executive. This changes the authority to the Portfolio Holder.
2.5.3 (previously 2.7)	Major changes to the Code	This makes clear that major changes are authorised through Executive committee. The previous version wasn’t clear.
2.5.4 (previously 2.7.3)	Routine formal reviews	This makes clear that if the routine three-yearly formal reviews result in a minor change this can be authorised by the Portfolio Holder. Significant changes resulting from the review will be authorised by the Executive committee.
3.5	Use of Artificial Intelligence (AI) and Facial Recognition (FR)	<p>This acknowledges that our cameras are capable of using FR but are not currently configured to do so, and any future use would only be in accordance with the SCC Code and any other prevailing legal considerations.</p> <p>Other forms of AI can be used, for example using the colour of a missing person’s coat to help narrow down, and speed up, a search, using ‘virtual tripwires’ to raise the</p>

		alarm if someone is in a place they shouldn't be within certain hours, or counting footfall in a certain area. None of these types of AI capture personal data over and above that which the CCTV service already captures.
5.2	Routine audit checks by the Team Leader	The list has been expanded to include checks of RIPA surveillance (to ensure that all RIPA work is still relevant and in date) and staff welfare checks (following up on potentially distressing incidents). These were included in the checks previously but are felt to be of sufficient importance to be mentioned specifically.
6.1.2	Security Industry Authority (SIA) checks of members and management	This is a new section which reflects the SIA requirement for elected members and management to be SIA licensed, as well as CCTV operators, which has been introduced since the last Code was adopted. This paragraph acknowledges that the requirement requires further clarity at this time.
6.1.8 6.1.9	Equality & Diversity	These sections stress the importance of E&D which, whilst always an important part of the CCTV service, were not explicit in the previous version.
6.1.13	Monitoring of City Council employees	<p>The paragraph below has been expanded to include the words in italics, in response to a small number of specific incidents.</p> <p>There will be no deliberate monitoring of CoLC employees going about their legitimate CoLC business; except in exceptional circumstances where there is a fear for their health/safety, <i>in respect of an immediate reaction to an offence, or otherwise with the consent of the employee.</i></p>
6.1.15	Prioritisation by CCTV Operators	<p>This is a new section which acknowledges the busy and often pressured working environment of the CCTV Control Room, and that CCTV Operators</p> <p>... cannot always deal with every incident that comes to their attention, nor can they proactively pick up every incident that takes place within view of the cameras. Operators are expected to prioritise based on their own experience and training. Operators will not be criticised for missing or refusing to follow incidents based on decisions reasonably made based on the information available to them and the circumstances at the time.</p>

6.2	Staff welfare	This is a new section which reflects the importance of staff welfare, in a busy working environment often dealing with potential disturbing incidents.
7.1.1	Police assuming direction of the CCTV system	This section allows Police to assume direction of the CCTV system in the event of extreme circumstances, such as national security, explosions or other localised serious emergencies. Previously this required the agreement of the Chief Executive, in consultation with the Leader. This has been amended to remove the Leader's agreement in the interests of streamlining this process.
7.2.1c	Police Data Sharing Agreement	This section now refers to the Council's Data Sharing Agreement with Lincolnshire Police, which was not referenced in the previous version.
9.2.7	Charging for release of footage	This new insertion acknowledges that the Council does not currently charge for the production and release of footage but that this may be subject to review.
9.3 (previously Section 9, and reference to retention of footage in 3.2.2(f))	Recording and Retention policy	This section has been updated to reflect changes made since the 2014 Code, some quite recently. This includes, importantly, that all footage is automatically deleted after 15 days unless it has been requested and saved in relation to an incident (this was previously 31 days); that requested footage will be disposed of after 30 days if it hasn't been collected (checks will first be made for significant incidents) and that seven days after passing footage to Lincolnshire Police it will be deleted from the Council's system (sufficient time for Lincs Police to check it was transferred successfully on to their system). These measures are all intended to reduce the amount of time that data is kept, in accordance with Data Protection requirements.