



**SURVEILLANCE CAMERA  
COMMISSIONER**

# **PASSPORT TO COMPLIANCE**

**STAGE 1**

**JUSTIFICATION AND PLANNING**

**ELSENHAM PARISH COUNCIL**

## INTRODUCTION

The Passport To Compliance has been produced as guidance by the Surveillance Camera Commissioner. It is intended to help organisations who are considering the deployment of a new surveillance camera system, or considering extending the functionality or purposes for which an existing system is used.

This guidance supports an informed step by step approach to deciding whether surveillance is necessary and justified to address their problems, and to the design, installation and maintenance of such a system.

Following the Passport To Compliance will help organisations meet the 12 guiding principles in the Surveillance Camera Code of Practice and, whilst not a guarantee, help compliance with other relevant legislation such as the Data Protection Act 2018, the General Data Protection Regulation and the Human Rights Act 1998.

A quick word on terminology. Most people are familiar with the term CCTV, which stands for closed circuit television. It originated when such systems worked on a closed circuit (as opposed to broadcast television which everyone could receive). These days most "CCTV" systems are in fact connected to networks and whilst still popular the term is no longer accurate. Industry standards often use the term video surveillance system (VSS) in preference to CCTV. In this guide, we have used the term surveillance camera system (or "system" for short). A surveillance camera system includes the cameras and all the related hardware and software for transmitting, processing and storing the data which is captured.

### Who is this guidance for?

The primary audience for the Passport to Compliance is relevant authorities as defined under S33 of the Protections of Freedoms Act 2012 who have a statutory duty to have regard to the guidance in the Surveillance Camera Code of Practice. In general terms, this means local authorities and the police in England and Wales.

If you work within any other public authority or any other body, whether public or private, which performs public functions you are free to adopt and follow the principles of the code on a voluntary basis. If you decide to do so, then following the Passport To Compliance process will be of benefit to you.

Small and medium size enterprises thinking about whether they need a surveillance camera system might want to refer to the [Surveillance Camera Commissioner's Buyers Toolkit](#) for a simple guide written with the non-expert in mind.

The Passport To Compliance comes in three stages:

Stage 1 – Justification and Planning (which comes with some additional guidance notes)

Stage 2 – Operational Requirement and System Specification

Stage 3 – Implementation

# SECTION 1

## 1.1 Justification

The *Passport to Compliance stage 1 justification and planning guidance notes* will help you to decide if surveillance cameras are necessary and justified as part of the solution to address an identified problem.

### 1.1.1 Define the scope, scale, nature and extent of the problem

State, in the box below, the **problem, or problems**, that the proposed surveillance camera system is seeking to address.

*Periodic acts of vandalism and anti-social behaviour within the area of Elsenham Playing Field. The Playing Field, owned by Elsenham Parish Council, also accommodates buildings and facilities belonging to/run by Elsenham Community Association, Elsenham Bowls Club, Elsenham Tennis Club and Elsenham Youth Football Club.*

Outline, in the box below, the **nature and extent** of the problem, or problems, that the proposed surveillance camera system is seeking to address.

*Damage to playing field football pitches from vehicles deliberately driving on the playing surfaces, damage to equipment (rubbish bins, children's play equipment, teen shelter), breaking into and damage to the Bowls Club with intent to steal money and property and breaking into the Tennis Club compound and clubhouse.*

### 1.1.2 Causal factors

In the box below, outline the causal factors underpinning the problem, or problems, that the proposed surveillance camera system is seeking to address. The *Passport to Compliance stage 1 justification and planning guidance notes* will assist you.

*The Playing Field is primarily an open area of land that is difficult to secure, particularly during night-time. In addition, two buildings and various recreational facilities and equipment are also present on the field.  
Due to multiple access and use by various user groups, closing the Playing Field by locking the pedestrian and vehicle gates is difficult, very expensive and requires a dedicated security company to be employed to carry out the work.*

### 1.1.3 Risk Assessment

There are a number of different issues you should take into account, when assessing the likelihood of a problem occurring and its likely impact. The most significant of these are laid out in the checklist below, which you can use to help build your understanding of the risk associated with the occurrence of a particular problem. There is space in for you to add comments, if appropriate.

#### What is the likelihood of the problem occurring?

Already occurring     High     Medium     Low

Any comments

*The problem is periodic and cyclic through each year, particularly during the summer months and the darker winter evenings.*

### What is the impact of the problem?

Is the problem likely to have a significant impact on individuals, vulnerable groups, business, the environment or other groups?

You should also consider how that impact manifests itself e.g. increased fear of becoming a victim amongst elderly residents, reduction in numbers of people using the town centre at night.

High                       Medium                       Low

Any comments

*Vandalism and damage of equipment and buildings demands unscheduled expenditure (repairs and replacements) to all affected parties; i.e. Parish Council, Bowls Club, Tennis Club and Youth Football Club. This also fosters a nervousness by the public, to visit the Playing Field and use its facilities through the evening, particularly during the darker evenings of winter-time.*

### Is the problem anticipated to be short-term/transitory; seasonal or long-term?

You should consider whether or not the problem is a “one-off” short-term issue or something more permanent, or occurring on a seasonal basis.

Short-term             Seasonal (repeating at certain times in the year)             Long-term

Any comments

*The present difficulties for the Parish Council is for it to properly secure the Playing Field areas against vandalism and night-time anti-social behaviour.*

### How important is it to control the problem?

You should consider what the consequences will be if you fail to control the problem. This might be done using a risk assessment matrix which can help you to prioritise the management of your problem(s).

High                       Medium                       Low

Any comments

*Failure to control and reduce the occurrence of vandalism, damage to property and facilities, and anti-social behaviour will result in a continuation and potential escalation of the problems, leading to the Playing Field becoming unsafe and deter residents from visiting and using its facilities.*

In completing this checklist, you will build your understanding of the risk associated with the problem in terms of likelihood and impact. This will in turn help to influence decisions regarding whether and how the problem might be addressed. As a result, you should give careful consideration to how you answer these questions.

## 1.2 Objectives of the required solution

In the box below, outline the objectives for the intervention that you would seek to implement to address the identified problem. You can use the *Passport to Compliance stage 1 planning and feasibility guidance* notes to help you if necessary.

- To provide a safe and secure environment for the benefit of those who might visit the Playing Field and its associated facilities.*
- To reduce the fear of crime by persons using the Playing Field and its associated facilities owned by the Parish Council and the other organisations, so they can enter, leave and use the buildings and facilities without fear of intimidation by individuals or groups.*
- To reduce the vandalism of property and to prevent, deter and detect crime and disorder.*
- To assist the Police, other Law Enforcement Agencies and the Parish Council with identification,*

*detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order, or contravention of bye-laws.*

- *To deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and signs on display, both on buildings, recreational land and play areas.*

### 1.3 Consideration of existing provision – can the problem be resolved by current solutions?

In the box below outline whether or not the problem can be resolved by using current solutions and the reasons for your decision. You can use the *Passport to Compliance stage 1 justification and planning guidance notes* to help you if necessary.

*Previous attempts to resolve the problems have proved to be difficult to carry out on a long-term basis and expensive to implement. The use of CCTV will act as a deterrent and offers a means of identifying the persons carrying out the criminal activities, vandalism and anti-social behaviour.*

### 1.4 Statement of need

If it is decided that a surveillance camera system is necessary and justified to address the identified problem, in the box below, you should now set out your objectives in a statement of need. Again, the *Passport to Compliance stage 1 justification and planning guidance notes* will assist you in this.

*There is a continuing problem with vandalism and anti-social behaviour, particularly during the hours of darkness and an associated negative impact on public perceptions of personal safety.*

*The proposed CCTV system aims to support and supplement existing efforts to address this problem through improving public perceptions of personal safety on the Playing Field during hours of darkness and will also contribute to the reduction in vandalism and anti-social behaviour.*

### 1.5 Proposed broad outline solution

#### 1.5.1 System

There now needs to be agreement regarding the appropriate surveillance camera system intervention to resolve the problem.

#### 1.5.2 Required/available budget

The template below enables you to start to build a budgetary requirement for the proposed surveillance camera system. You should add other factors and associated costings that are not included below, but which are directly relevant to your system requirement. The *Passport to Compliance stage 1 planning and feasibility guidance notes* can assist you in this process.

#### Budgetary requirement

Cost heading	£	£
System costs – Hardware & Installation	5,710	
System costs – Ground works, etc.	4,032	
System costs – Electrical	471	
Staff costs – Direct	Nil	
Staff costs –	Nil	

Cost heading	£	£
Training		
Service costs – Maintenance and repair	250	
Service costs – Other		
Consultancy	Nil	
Consumables		
Accommodation of Equipment	100	
Equipment		
<i>Other costs (list below)</i>		
Security – column brackets	512	
CCTV Signage	215	
<b>Total required budget</b>	<b>11,290</b>	

### 1.5.3 Public consultation – design, disseminate, collate, analyse

In the box below, you should outline how you propose to consult with the public, if appropriate. You might also want to outline your public consultation “document”, who will carry out the consultation and associated timescales. Again, the *Passport to Compliance stage 1 justification and planning guidance notes* can assist in this process.

*Information regarding the introduction of CCTV into the Playing Field to assist with the issues of vandalism and anti-social behaviour has been discussed regularly at Parish Council meetings, and in consultation with other users and stakeholders of the Playing Field.*

In the box below, you should summarise the results of the analysis of the data emerging from the public consultation process.

*The responses to the CCTV proposals were, and continue to be, positive with stakeholders supporting and participating with the scheme. No negative responses have been received from the public and/or residents.*

### 1.5.4 Stakeholder consultation

In the box below, you should summarise key points emerging from the stakeholder consultation process. The guidance in relation to public consultation in the *Passport to Compliance stage 1 justification and planning guidance notes* is also relevant here.

*All stakeholders in the CCTV scheme have made a financial contribution in support of the financing of the scheme.*

*The Elsenham Community Association gave permission for the CCTV recording equipment to be accommodated securely in its Memorial Hall building.*

## 1.6 Data Protection Impact Assessment (DPIA)

Rather than duplicate the content of the SCC’s [DPIA advice and template](#) within this document, we strongly recommend that you follow this link to download and carry out your DPIA as part of Stage 1 of the Passport to Compliance. Consultation with those who are likely to be under surveillance forms an integral part of the DPIA process. The guidance in relation to DPIA requirements in the *Passport to Compliance stage 1 justification and planning guidance notes* is also relevant here.

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