



**SURVEILLANCE CAMERA
COMMISSIONER**

PASSPORT TO COMPLIANCE

STAGE 1

JUSTIFICATION AND PLANNING

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.

Protection of school property
Safeguarding of Students, Staff and visitors
Behaviour Management

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 property (Vandalism)
Theft of school resources
Behaviour Incidents

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.

Incidents commonly occur out of "sight" of existing CCTV equipment e.g. vandalism of property, safeguarding concerns including reports of bullying

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

Vandalism to school property/behaviour incidents have been recorded in school MIS system and Class Charts. Recorded reported issues of safeguarding concerns with safeguarding lead.

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

Students feeling safe within the school environment demonstrated by responses to pupil safety survey.

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

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

Pupil safety is school top priority and ensuring property is maintained in good condition is a requirement of the lease with the Diocese.

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.

Preventing theft or damage
Reducing Anti-Social Behaviour
Bullying prevention
Increasing safety of whole school community

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.

Insufficient existing cameras for number of buildings and size of site
 Limited staff e.g. no lunchtime supervisors therefore staff monitoring is not guaranteed throughout breaks

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.

The proposed CCTV system aims to support the existing efforts to address Safeguarding concerns and the protection of School property.

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		
System costs – Software		
System costs – Installation		
Staff costs – Direct		
Staff costs – Indirect		
Training		
Service costs – Maintenance and repair		
Service costs – Other		
Consultancy		
Consumables		
Accommodation		
Equipment		
<i>Other costs (list below)</i>		
No further hardware costs associated with project, all cameras have been purchased in previous budget year		

Cost heading	£	£
Total required budget		

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.

An online survey with the School voice students, consultation period with parents/carers alongside consultation with staff. residents/neighbors at the back end of the school site will also be contacted so they are aware any cameras being installed in this vicinity do not impact them.

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

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.

Academy Committee and Directors.

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.