



**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.

The proposed surveillance camera system seeks to address the following problems:

- 1) Security of the skate park asset and neighbouring recreational facilities from antisocial behaviour and criminal damage;
- 2) Public safety and confidence in using the skate park and neighbouring recreational facilities; and
- 3) Erosion of valued outdoor recreational space for vulnerable group.

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

A police report presented to the Annual Parish Meeting held in Padstow on 10 May 2022 outlined that the number of recorded crimes and incidents in Padstow had increased by 20.1% during the period 1.5.21 to 8.5.22 when compared to the same period in the previous year. PC Alex Allen of the Wadebridge Neighbourhood Team advised that the increase in anti-social behaviour in Padstow and the impact of that on businesses and residents in recent years was something of concern. PC Allen further advised that anecdotal evidence indicated issues with the trafficking of drugs and that the possession of drugs in Padstow was an increasing problem. He advised that drug operations were becoming more transient due to County Lines targeting vulnerable people and this was moving into Padstow.

At the skate park in Padstow, Padstow Sk8, incidents of anti-social behaviour occur on a regular basis. The issues have existed since the skate park was built and have been monitored by the Leisure, Tourism and Open Spaces Committee since 2019. Evidence suggests that over the last couple of years the incidents have increased in severity and scope, expanding to include Padstow Town Council's (PTC) neighbouring scout hut and Cornwall Council's Link Road toilets.

Regular misuse of the skate park and anti-social behaviour in this area during the evenings includes drug taking, alcohol related disorder and vandalism, with loud, inappropriate music, swearing, shouting and littering taking place during the day outside of school hours. PTC employee's clear alcohol and drug related detritus and other debris from the skate park and surrounding area on a daily basis. Graffiti, some of which has been of a vulgar nature inappropriate for a public amenity setting provided for children, is also regularly removed and criminal damage to property repaired.

The local community has expressed concerns over the anti-social behaviour in the skate park and in the under 12's play area and Neighbourhood Beat Manager, PC Amy Honeywill confirms that members of the public have approached the police with concerns over drug selling in and around the skate park. She confirms that the Wadebridge Neighbourhood Team regularly attend the areas known for anti-social behaviour and drug taking / selling whilst out on patrol and the skate park in Padstow is included on this patrol and is the main area of focus in Padstow that is patrolled the most frequently.

The Town Council are informed anecdotally that many children are not permitted to go to the skate park alone whilst others are not permitted to go at all during the evening. Parents have expressed concerns that younger children are intimidated by the anti-social behaviour of those misusing the skate park. There is a clear community concern and lack of confidence in using the skate park and this is limiting

the use of this valued recreational space. In response to a community survey regarding the Lawn's under 12s play area in June 2022, 11% of respondents raised concerns regarding anti-social behaviour in the skate park and/or the under 12s play area when asked whether they wished to share anything with PTC. The responses demonstrate that the shouting, swearing, explicit music and general anti-social behaviour occurring in the skate park is also impacting the use of the adjacent under 12s play area .

The problems demonstrate that the security of the skate park is insufficient and rectifying the damage caused by anti-social behaviour is costing public money in time and resources. There is no recourse from the perpetrators and there are no prosecutions for criminal acts, consequently perpetrators are undeterred. The result of this is an environment which is at best below expectations and at times unsuitable as a recreational area for children.

### 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.

#### Location:

Lawns area as a whole is away from centre of town and residential areas. Natural surveillance from car park users reduces in the evenings when there is less turnaround of vehicles. Low passing footfall. Only occupied building in Lawns is Padstow Social Club, skate park and under 12's play area are shielded from view by buildings and trees. Nature of the skate park structure also provides spaces to hide from view.

#### Victim:

Skate park and neighbouring recreational facilities which are community assets, clear up of anti-social behaviour funded by public money. Members of the public, particularly children, who feel unsafe and lack confidence to use the recreational facilities. Vulnerable young people who may be influenced by inappropriate behaviour.

#### Offender:

General rise in crime in area and increase in County Lines issues. In the evenings – youths possibly lacking appropriate stimuli, looking for remote space to conduct anti-social behaviour without challenge or consequence. During the day - youths without supervision, possibly a lack of age related facilities.

#### Capable Guardian:

Lack of natural surveillance due to environment (tall trees and buildings obscure lines of sight from occupied buildings). PTC employee presence during the daytime but not able to be ever present and have limited resources and powers to challenge. Low occupancy of the area in the evening, not a residential area and only one business. Ad hoc police patrols in evenings but not able to be ever present. Lack of CCTV in the area.

### 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 problems are already occurring in the skate park and to a lesser degree the under 12s play area.

The causal factors identified in 1.1.2 are applicable to all the recreational facilities in the Lawns area. These being, the under 12's play area, the tennis courts (soon to be developed as a MUGA - multi-use-games-are) and the Core Building. For this reason, there is a high likelihood the problems will migrate to the under 12's play area and the tennis courts following the introduction of a surveillance camera system on the skate park.

The likelihood that the problems will migrate to the Core Building is thought to be reduced to medium because there is limited space and access around the building in comparison to the skate park, under 12's play area and the tennis courts.

#### 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

Reduction in the number of children using the skate park and neighbouring recreational facilities. In turn reducing the effect of these valued outdoor spaces on the health and wellbeing of the community's young people.

Increased fear amongst parents that children will become victims of crime or, through bad influence, the perpetrators of crime.

Increased fear of a drug problem in Padstow because these public spaces provide an ideal location for drug related activities due to inadequate capable guardians.

Poor public perception of the facilities.

Drain to public money in time and resources in repairing criminal damage and cleaning up after anti-social behaviour.

Possible removal of the facility altogether.

Reputational damage to town.

### 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

Offenders are thought to be mostly Padstow youth or from the neighbouring towns of Wadebridge and Newquay and therefore a year round concern.

### 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

Increased fear of crime within the community, impacting the quality of life of local residents. Outdoor facilities further under used and future projects e.g MUGA development not trusted to be safe environments. Wellbeing of the community reduced and outdoor play areas redundant or removed.

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.

- a) Preventing damage.
- b) Reducing anti-social behaviour.
- c) Increasing public perceptions of safety in the Lawns area.
- d) Increasing successful convictions of offenders.
- e) Increasing public confidence in using the recreational facilities at the Lawns.
- f) Continued development and investment by PTC in recreational facilities which are well used and valued.

## 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.

- 1) Reversing the investment in the skate park and planned for improvements in outdoor recreation are not viable solutions to resolving the issues. The need for increased facilities for young people was identified during the community consultation process of the Padstow Parish Neighbourhood Plan. This resulted in the inclusion of a policy which offers support to the provision of additional facilities for young

people. In particular the benefit of outdoor facilities to wellbeing and mental health are widely accepted and it is argued that the COVID 19 pandemic has resulted in a greater need to focus on these issues.

2) As an intervention measure lighting in the area at night was improved by way of a PRI light, installed in June 2019. The measure was relatively ineffective, doing little to improve the lack of natural surveillance.

3) The areas are unsupervised during the evenings. Padstow Town Council does not have the capacity to undertake patrols to monitor the area at this time. There is an employee presence periodically during the day however, employees have limited powers, if any, to tackle crime or anti-social behaviour.

4) The skate park is included in the Wadebridge Neighbourhood Team's regular patrols of areas known for anti-social behaviour and drug taking/selling. It is the main area of focus in Padstow that is patrolled the most frequently. Police have spoken to youths, seized alcohol and conducted stop checks for drugs in this area. However, the police are not able to be ever present. The opinion of the local Neighbourhood Beat Manager, PC Honeywill is that "CCTV in this area would be a good deterrent for drug use and ASB. It would also be useful for detecting Crime."

5) The nature of the recreational facilities precludes the option to increase physical protection or prevention such as locks and fences.

6) Planned improvements to recreational facilities e.g the new MUGA (Multi-Use-Games-Area) will provide opportunities for more appropriate activities for young people who are too old for existing facilities. This may have an impact on anti-social behaviour but public confidence needs to be increased in order to encourage use of new facilities. Discussions with local groups and youth workers to improve activities and opportunities for young people are taking place. It is thought this will have a positive effect on anti-social behaviour but it is acknowledged that these are conversations in the early stages and any outcomes will take time to progress.

## 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 growing problem with anti-social behaviour including drug and alcohol related disorder and damage to Town Council property at the Skate Park in the Lawns area, the neighbouring Under 12's Play Area and neighbouring Cornwall Council land. There is an associated negative impact on public perceptions of personal safety and confidence in using the skate park and neighbouring recreational facilities. There are no convictions for criminal damage and there is a perception that valued outdoor recreational spaces for children who are considered a vulnerable group are being eroded.

The proposed CCTV system aims to supplement existing efforts to address this problem by contributing to the reduction of anti-social behaviour, supporting prosecutions for criminal damage/vandalism and improving perceptions of public safety and confidence in using the skate park and neighbouring facilities.

## 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		3332.00
System costs – Software		N/A
System costs – Installation		3000.00
Staff costs – Direct		N/A
Staff costs – Indirect		N/A
Training		N/A
Service costs – Maintenance and repair		Cameras monitored as part of existing MTA checks
Service costs – Other		N/A
Consultancy		N/A
Consumables		N/A
Accommodation		N/A
Equipment		N/A
<i>Other costs (list below)</i>		
Surveymonkey		384.00
Contingency		1500
<b>Total required budget</b>		<b>£8216</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.

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.

### 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.