

HARROGATE DISTRICT CCTV SERVICE



**OPERATIONAL
CODE OF PRACTICE**

Safer Communities
St Luke's Avenue
Harrogate
HG1 2AE

June 2022

CONTENTS

PARAGRAPH

1	INTRODUCTION
2	DEFINITIONS
3	PURPOSE
4	DATA PROTECTION
5	REGULATION OF INVESTIGATORY POWERS ACT
6	DATA PROTECTION CODE OF PRACTICE FOR SURVEILLANCE CAMERAS AND PERSONAL INFORMATION
7	CHANGE TO THE CODE
8	RESPONSIBILITIES OF THE OWNER
9	ACCOUNTABILITY
10	PUBLIC INFORMATION
11	RESIDENTIAL PROPERTY
12	ASSESSMENT OF THE SCHEME
13	STAFF
14	COMPLAINTS
15	BREACHES OF THE CODE
16	CONTROL AND OPERATION OF CAMERAS
17	ACCESS AND SECURITY OF CONTROL ROOM
18	DISCS AND RECORDED MATERIAL
19	PHOTOGRAPHS
20	DEALING WITH INCIDENTS
21	POLICE CONTACTS AND USE OF THE SYSTEM
22	CONSULTATION PROCEDURES

APPENDICES:

Appendix 1

Access to CCTV Control Room Authorisation

Appendix 2

Operator Confidentiality Form

Appendix 3

Complaints Procedure

Appendix 3

Request for Authorised Visit

**CCTV SURVEILLANCE SERVICE
OPERATIONAL CODE OF PRACTICE**

1.0 INTRODUCTION

- 1.1 Harrogate Borough Council (HBC) has installed a comprehensive CCTV surveillance system which covers key areas, namely town centre areas and associated car parks in Harrogate, Knaresborough and Ripon, along with other HBC owned properties and areas including the Civic Centre, the Hydro, Jack Laugher Leisure & Wellness Centre, the Crematorium, Parks and Open Spaces, HBC Homeless Hostels. There are also internal cameras within the CCTV Control Room and a deployable camera.
- 1.2 The CCTV system is owned by Harrogate Borough Council and the central Control Room is staffed by Council employees.
- 1.3 The CCTV Control Room provides surveillance to meet business and operational need and will provide 24 hour recording. Authorised users will be given direct access to the control room, as defined in the agreement appended as Appendix 1 to this Code.
- 1.4 This Code of Practice provides a clear statement of the purpose of the scheme gives guidance on the operation and management of the system and provides a method by which the public can make representations to Harrogate Borough Council about issues raised in relation to the use of CCTV.
- 1.5 All recorded material is owned by Harrogate Borough Council and will be subject to the statutory conditions of the Data Protection Act 1998 & 2018 and the Regulation of Investigatory Powers Act 2000, and also in accordance with paragraphs 17 and 18 of this Code of Practice.

2.0 DEFINITIONS

- 2.1 “The Surveillance Area” means the area covered by the CCTV cameras
- “CCTV System” means the surveillance system installed to cover the public area
- “CCTV Operator” any member of staff employed by HBC to monitor CCTV images at the Control Room
- “The Management Group” means the group comprising of the Head of Safer Communities, Community Safety & CCTV Manager, Traffic Signals Engineer (NYCC) , the CCTV Supervisor and HBC ICT Representative
- “Cabinet Member” Cabinet Member Housing & Safer Communities

“HBC”	means the Council of the Borough of Harrogate
“DCA”	nominated Director or Director of Corporate Affairs of HBC and includes any officer duly authorised by him to carry out the requirements of this Code
HSC	Head of Safer Communities
Authorised Body	Any Authority who has a Service Level Agreement in place for the provision of CCTV services from HBC
“The Control Room”	the monitoring centre operated by HBC in Harrogate (the exact address of which is confidential)
“RIPA”	means the Regulation of Investigatory Powers Act 2000

2.2 For the purposes of this Code, where the context so require:

- (a) singular includes the plural;
- (b) references to any party shall include its successors in title of that party;
- (c) reference to any statute shall include that statute as subsequently amended, all such instruments made under the statute and re-enactment of the relevant provisions in the subsequent statute.

3.0 PURPOSE

3.1 The primary objective of the scheme is to provide a safe public environment for the benefit of those who live, trade, visit, service and enjoy the facilities of the area. This objective will be carried out by the pro-active monitoring of the system, so as to:

- assist in the detection and prevention of crime and antisocial behaviour; along with the maintenance of public order
- facilitate the apprehension and prosecution of offenders in relation to crime and public order
- prevent or mitigate interruptions to traffic flow (not to endorse minor breaches of traffic law)
- reduce the fear of crime and provide reassurance to the public
- provide the Police and the Council with evidence to take criminal and civil action in the Courts
- to assist in improving the environment in the areas monitored including town and city centres
- to provide assistance to emergency services
- to assist third parties with evidence to take criminal and civil actions (see 3.3 below)

3.2 Privacy

Every consideration will be given to the right of the general public to go about their daily business with minimum loss of privacy. Whereas total privacy cannot be guaranteed within a CCTV surveillance area, the cameras will not be used to unduly monitor persons going about their lawful business. It is inevitable that individuals could be caught on camera briefly during general surveillance but persons will only be specifically monitored, for any length of time, if there is suspicion or knowledge that an offence may have occurred or be about to occur. In such an event, the CCTV Operator must log the incident giving a reason for the monitoring of the individual. CCTV Operators must be able to justify their actions.

- 3.3 The CCTV system will be used for the provision of recordings for evidential purposes to the Police and other bodies having prosecution powers, such as Customs & Excise or the Health & Safety Executive. In some instances, the system may, at the discretion of the HBC Legal department, be used for the investigation of specific matters of a different type such as insurance companies dealing with road traffic incidents.

This Code of Practice is supplemented by a separate electronic procedural database. Information is restricted to CCTV staff.

4.0 DATA PROTECTION

- 4.1 The CCTV system is registered with the Information Commissioner's Office.

5.0 REGULATION OF INVESTIGATORY POWERS

- 5.1 The CCTV system will operate in accordance with the RIPA and HBC's policy on covert collection of information.

6.0 A DATA PROTECTION CODE OF PRACTICE FOR SURVEILLANCE CAMERAS AND PERSONAL INFORMATION (15/10/2014)

- 6.1 In compliance with the Information Commissioner's Office, the system will be reviewed annually to ensure that each camera is fit for its specific purpose and is proportionate to the needs of the surveillance area.
- 6.2 Principle 2 of the surveillance camera code of practice states that the use of a surveillance camera system must take into account the effect on individuals and their privacy.
- 6.3 A Privacy Impact Assessment on each camera will be undertaken annually and include consideration of the Protection of Freedom Act 2012, the Human Rights Act 1998 and Data Protection Legislation. This will be undertaken in accordance with the Data Protection Impact Assessment Framework produced by the Surveillance Camera & Biometrics Commissioner.

7.0 OTHER LEGISLATION

- 7.1 The CCTV system will comply with the Airwave Service Code of Practice and hold the necessary TEA2 User Sub Licence. A Memorandum of Understanding is in place with North Yorkshire Police for the use of Airwaves.
- 7.2 CCTV Operators, Supervision and Management will be subject to compliance with the Official Secrets Act 1989.
- 7.3 Compliance against the National Surveillance Camera Strategy for England and Wales and specifically Principle 5; Clear rules, policies and procedures must be in place before a surveillance camera system is used and these must be communicated to all who need to comply with them. Updated national Surveillance Camera Code of Practice January 2022.

8.0 CHANGES TO THIS CODE

- 8.1 A major change will only take place after full consultation is undertaken with the relevant interest groups and upon the agreement of organisations who have a participatory role in the operation of the system. Any change must be approved by the Cabinet Member.
- 8.2 A minor change may be agreed by the Management Group without the approval of the Cabinet Member. Any such change must be reported using the normal procedures.
- 8.3 A major change will have a significant impact upon the Code of Practice or upon the operation of the scheme. A minor change is one which is required for clarification will not have a significant impact.

9.0 RESPONSIBILITIES OF THE OWNER

- 9.1 The "Owner" of the system is HBC, Safer Communities, St Luke's Avenue Harrogate, North Yorkshire, HG1 2AE
- 9.2 All responsibility for the introduction and implementation of the Code of Practice and the full compliance with operational guidance resides with the Owner.
- 9.3 This Code of Practice and any subsequent amendments will be made available for public examination by the Owner and is available on the Council's website.

10.0 ACCOUNTABILITY

- 10.1 Copies of this Code of Practice and particulars of the Complaints system detailed in paragraph 15 below will be made available.
- 10.2 Copies of the Annual Report will be published by the Owner in accordance with this Code of Practice and upon approval by the Cabinet Member and made available to the public.
- 10.3 The Police are required to satisfy the Owner that they have in place systems to monitor and audit the participation of the Police in the scheme including full

compliance with this Code of Practice. Monitoring and Audit must be undertaken by police officers of appropriate seniority and experience. For audit purposes the officer should have the appropriate skills, irrespective of rank. This individual may be a civilian or Police officer employed by North Yorkshire Police.

- 10.4 Spot monitoring or audits will be carried out by the Community Safety & CCTV Manager and or the CCTV & Business Crime Operations Officer. If the audit involves the duties of either of these then that member should not be part of the audit team and the other representative should carry out the audit with another member of the Management Group.
- 10.5 The Community Safety & CCTV Manager is the named Single Point of Contact (SPOC) responsible for compliance of surveillance camera systems, best practice and relevant legal obligations within HBC.

11.0 PUBLIC INFORMATION

- 11.1 Cameras should not be hidden but should, as far as is consistent with the purposes of the network, be placed on public view.
- 11.2 Signs that CCTV cameras are operating shall be displayed in and around the surveillance area in locations visible to members of the public.
- 11.3 There is no requirement to place signs directly under cameras however any signage must be visible. Regular reviews take place on the locations of any signage.
- 11.4 This Code of Practice shall be freely available to the public.
- 11.5 The owner will publish an Annual Report following approval by the Cabinet Member.

12.0 RESIDENTIAL PROPERTY

- 12.1 The network will operate in a manner that is sensitive to the privacy of people residing and working in the surveillance area. The cameras will only view public areas and not look through windows/doors of private premises. Exceptions to this may be made when a RIPA authorisation is in place or in response to a request by Police when a crime is believed to be taking place. See 6.2

13.0 ASSESSMENT OF THE NETWORK

- 13.1 The "Owner" is responsible for ensuring that the CCTV system is evaluated periodically, at least on an annual basis. This function shall take the form of a written report to the Cabinet Member.
- 13.2 Evaluation of the network will include data on the following performance indicators as part of a written report:
- Number of incidents/occurrences
 - Number of discs processed (evidential)

- Number of stills processed
- Number of incidents reviewed
- Grading of each camera – based upon frequency of use, the number of incidents per camera and the opinions of the CCTV Team and NYCC Urban Traffic Control Management.

14.0 STAFF

- 14.1 The Owner will be responsible for selecting and employing all staff employed to work with the CCTV system.
- 14.2 An effective and fair system of recruitment and selection of staff shall be employed which includes measures to ensure that the selection process provides for validation of the suitability of candidates by way of Police vetting, combined with observation and communication skills tests.
- 14.3 All front line CCTV operators must undertake the necessary accredited Security Industry Authority CCTV Training and comply with the Security Industry Authority standards of licensing. Training will be provided by the employer in the form of in-house training.
- 14.4 A disciplinary procedure shall be in place which incorporates compliance with the Code of Practice and operations procedures and also makes plain the risk to staff in the event of breaches of the code or misappropriation of recordings or photographs.
- 14.5 All CCTV staff, supervision and management must be bound by an agreement of confidentiality which can be enforced during and after termination of employment. Any proven breach of confidentiality could mean instant dismissal. A sample form of agreement is attached as Appendix 2
- 14.6 A defined system of staff monitoring and supervision has been implemented that ensures compliance with this Code of Practice and the operational procedures. The Community Safety & CCTV Manager / CCTV & Business Crime Operations Officer will have responsibility for ensuring that CCTV Staff follow the operational procedures. The Control Room will have a generic Operational Procedure Manual as well as an electronic version available to all operational staff.

15.0 COMPLAINTS

- 15.1 To obtain universal recognition this Code of Practice must address the interests of all who may be affected by it, and not confined to the interests of the “Owner”, or the needs of the criminal justice system.
- 15.2 Information about the manner in which an individual can make observations or a complaint about any aspect of the scheme must be published. A copy of this information is annexed to this Code of Practice. Appendix 3
- 15.3 All investigations following a complaint must be carried out in an impartial manner and reported to the Head of Safer Communities.

15.4 Investigations following a serious complaint must be carried out by the Community Safety and CCTV Manager.

15.5 All remedies must be communicated in writing to the complainant.

16.0 BREACHES OF THE CODE

16.1 Responsibility for security issues in respect of CCTV will rest with the DCA or any duly appointed Officer.

16.2 All breaches of this Code of Practice and of security will be subject to proper investigation by, in the first instance, the HSC. This person shall be responsible for making recommendations to the Owner to remedy any breach proved.

16.3 If the breach is of a serious nature the HSC must appoint an individual with relevant professional qualifications independent from the operation of the scheme to investigate the breach and to make recommendations to the Owner on how the breach can be remedied.

17.0 CONTROL AND OPERATION OF CAMERAS

17.1 All CCTV Operators who have access to the camera equipment and recording equipment must act with the utmost probity.

17.2 Only CCTV Operators with responsibility for using the equipment shall have access to the operating controls.

17.3 All use of the cameras and control equipment shall be in accordance with the purposes and key objectives of the scheme as detailed in the business plan, the annual report, the policy on covert collection of information RIPA and this Code of Practice.

17.4 Cameras must not be used to look into private residential property unless this is part of an authorised surveillance operation. The Owner must adopt operational procedures and technological measures that ensure restraints are imposed upon the use of cameras overlooking private premises.

17.5 All CCTV Operators shall be subject to supervision procedures and work practices that are sufficient to ensure compliance with this Code.

17.6 All CCTV Operators are to be made aware that their actions, operations and recordings are subject to routine audit and that they may be required to justify actions or their interest in a member of the public or premises.

17.7 CCTV Cameras used in the monitoring of HBC owned premises may be used for the provision of evidence in staff disciplinary procedures. HBC managers of those premises will make staff aware of this.

18.0 ACCESS AND SECURITY OF CONTROL ROOM

18.1 Only those HBC Officers or Police officers with a legitimate reason to do so will be allowed access to the Control Room.

- 18.2 Public access to the Control Room or the demonstration of equipment shall not be allowed except for lawful, proper and sufficient reasons. All to be agreed by the Head of Safer Communities.
- 18.3 A responsible CCTV Operator will be present during the operation of the monitoring equipment. If monitors are to be left unattended, the room must be secured against unauthorised entry.
- 18.4 A Control Room occurrence log shall be maintained. It will record details of the duty (shift) operative, and will include the names of any persons, or groups that have gained authorised entry to the Control Room. It should also contain details of any unusual occurrences regarding entry to the Control Room.
- 18.5 The operation of the monitoring equipment shall be limited to staff with the correct authorisation, training and responsibility.
- 18.6 Arrangements for the Control Room must include the following requirements to ensure that the Control Room is secure at all times:
- Routines and procedures and any other facilities necessary to ensure that the Control Room is protected from unauthorised access.
 - Records are kept of all access to the Control Room, recording details of the individual concerned, and time of arrival and departure.
 - Operation times and the numbers of staff on shift are clearly defined and complied with.
 - Access to the Control Room is restricted to operating staff and their managers according to pre-arranged shifts and on production of valid identification.
 - Technical repairs and cleaning and similar tasks should be carried out in controlled circumstances.
 - Access by visitors should be carefully defined and be the responsibility of the owner.
 - Police visits will be made in order to interview staff or to collect or return recorded footage. All Police visits must comply with the provisions of this Code of Practice, and the purpose of the visit should be established and confirmed and approved by the Duty Operator.
- 18.7 Security procedures on access to the Control Room must be maintained and strictly adhered to. Access must be monitored and all concerned should know that security procedures on access to the Control Room are included in the regular audit.
- 18.8 The occurrence log must be maintained on the basis of date and time of day throughout operations and brief details given of all incidents within the Control Room, including particulars of visits.
- 18.9 All security systems must be fully maintained and any defects reported to the Individual with day-to-day responsibility for the scheme.

19.0 RECORDED MATERIAL

- 19.1 All recorded material produced from the CCTV system remains the property of HBC and is protected by copyright until the point when the Authorised Body signs the "Transfer of Data" form and therefore becomes the Data Controller for that material.
- 19.2 Recorded material shall only be used for the purposes as defined in the Code of Practice.
- 19.3 Access to recorded material will only take place as defined in this Code of Practice.
- 19.4 The showing of recorded material to the public will only be allowed in accordance with the law; either in compliance with the needs of the Police in connection with the investigation of crime, which will be conducted in accordance with the provisions of any relevant Code of Practice under the Police and Criminal Evidence Act 1984 and any advice and guidance given to the Police from time to time or in any other circumstances provided by law. All recorded material is subject to the conditions and provisions of the Data Protection Act 1998 General Data Protection Regulation 2018, the Data Protection Act 2018 and RIPA 2000.
- 19.5 The following points must be observed when handling recorded material:-

Use of Recording Equipment

Recording equipment should be checked daily to ensure it is in good working order and evidential discs should be checked before issuing to ensure the recording quality is sufficient.

Evidential Use of Recordings

- Any disc that is provided for evidential purposes must be of proven integrity
- Staff will provide the Police with witness statements required for evidential purposes
- Copy discs must be individually and uniquely identified and labelled
- A register(s) must be maintained giving the exact date and time of the production of each disc, the name of the person requesting the evidence and the reason for the request
- A Master Copy and a Working Copy will be produced for each evidential request
- The Master Copy will be sealed in a numbered evidence bag
- The Master Copy will not be stored in the Control Room, all disc copies will be handed over to the Authorised Body
- Copy discs not collected by the requesting officer within six weeks will be destroyed
- Before any copies are removed from the Control Room, a Transfer of Data form must be completed and signed by the duty CCTV Operator and the Authorised Body.

By signing the Transfer of Data Form, the Authorised Body accepts responsibility for the retention, secure storage and destruction of the evidential copies

Police access to recordings

- Police may apply for access in accordance with an agreement made with the owner where the Police reasonably believe that access to specific recordings is necessary for the proper investigation and detection of a particular offence or offences or for the prevention of crime
- Police may obtain access under the provisions of the Police and Criminal Evidence Act 1984 (PACE)
- Discs provided to the Police shall at no time be used for anything other than the purpose specified and identified when the discs are released to the Police by the Control Room
- Arrangements may be made from time to time for a Police officer appointed in accordance with liaison arrangements to visit the Control Room and confirm that agreed procedures are being followed
- Charges will be made for reviewing and the production of evidence. The police will be notified annually of any changes in accordance with the service level agreement 2011/12.

Third party access to recordings

- Access to recordings may be obtained in connection with civil disputes by court order or be extended to lawyers acting for defendants or victims in connection with criminal proceedings.
- In certain circumstances, within the boundaries of the Data Protection legislation and RIPA 2000 insurance companies may have access to recordings of incidents in connection with their enquiries e.g. road traffic incidents.
- No other access will be allowed unless approved by the individual appointed as the Data Protection Officer for HBC for reasons which fall within the purposes and objectives of the scheme and in accordance with the Code of Practice
- Charges will be made for reviewing and the production of evidence. Details of charges will be made available on the Council website.

19.6 Secure arrangements must be made for the use of certain discs for the purposes of Police and staff training.

19.7 As the scheme is registered with the Information Commissioner's Office it is necessary to provide a viewing station and to make arrangements to protect the images of other individuals on recordings from being disclosed.

20.0 PHOTOGRAPHS

20.1 Still photographs should not be taken as a matter of routine. The taking of each photograph must be capable of justification.

20.2 All still photographs will remain the property of the owner and will be indexed in sequence. A record will be kept of the reason for production of the photograph, date and time, the particulars of production of a live photograph,

and information identifying the Control Room staff member responsible for producing the photograph.

- 20.3 Any still photograph released to the police will be dealt with by the police as an exhibit and shall be used in the course of their investigation to detect and prevent crime and disorder and used as evidence for prosecution. At no time should it be used for anything other than the purpose specified and identified when released to the Police.
- 20.4 All still photographs will be destroyed within six months unless made the subject of an application from the Police or if they are required as evidence. A record will be kept of the destruction of all photographs.
- 20.5 The use of photographs for briefing camera Operators should be conducted strictly in accordance with advice from the Police to avoid contamination of evidence. Unless otherwise advised by Police, photographs:
- should not be on display and should be kept in a binder or album
 - should be seen only by individuals stipulated by the Police

21.0 DEALING WITH INCIDENTS

21.1 Locally agreed procedures must provide for:

- Referral to Police who will respond according to local agreement
- Compliance with local arrangements for reporting town centre management incidents or concerns
- Compliance with local arrangements for reporting matters to emergency services
- Referral to security staff according to local arrangements

22.0 POLICE CONTACTS AND USE OF THE SYSTEM

- 22.1 Relationships between Control Room staff and management employed by the owner and the Police must be conducted strictly in compliance with this Code of Practice. These requirements must not be exceeded formally, and the different roles and responsibilities of staff and Police should be acknowledged and respected.
- 22.2 Officers should be identified by the Police and the owner for liaison for day-to-day purposes. Senior staff should be nominated for liaison for audit purposes and for assisting in making recommendations effecting the operational management of the scheme.
- 22.3 Access to recordings and the Control Room must comply with the Code of Practice and the time and date and purpose of such access be recorded and monitored.
- 22.4 The purpose for different links, which must accord with the Code of Practice and operational guidance, between Police and Control Room should be understood, complied with, and not exceeded. Any change in these links will amount to a change in the Code of Practice and must be agreed in accordance with the Code of Practice before being implemented.

- 22.5 All incidents and occurrences involving the Police will be recorded in the Control Room incident log.
- 22.6 Use of the system by the Police must be in accordance with the Code of Practice, operations manual, and agreed protocols and must be subject to procedural safeguards and audit.

23.0 NORTH YORKSHIRE COUNTY COUNCIL ACCESS TO THE NETWORK

- 23.1 NYCC through a Service Level Agreement have access to named cameras on the network in order to undertake their urban traffic control management functions.

24.0 CONSULTATION PROCEDURES Section 17 Crime and Disorder Act 1998

- 24.1 Formal consultation must be established by HBC Departments with the Community Safety and CCTV Manager under Section 17 of the Crime & Disorder Act 1998. This consultation must allow the Community Safety & CCTV Manager to respond within 21 days to any notice of development, works, alterations or planting which may affect the quality of the CCTV system or may require its amendment or extension.
- 24.2 The duty on the Council is to take into account the crime and disorder implications of decisions it makes and must include the use of or the effect on the CCTV system which is seen as a major contributor to the safety levels in town centres.

HARROGATE BOROUGH COUNCIL CCTV CONTROL ROOM

Access to the above facility is restricted and any visit must be fully authorised five working days before the visit.

Please complete this form and full, obtain authorisation and then email it to the Community Safety & CCTV Manager at community.safety@harrogate.gov.uk

This request is made by: _____

Purpose of visit: _____

Date of proposed visit: _____

Time of proposed visit: _____

All members of the group must provide the name, one line address and name the organisation they represent. Last minute substitutes are not permitted.

	<u>Name</u>	<u>Address</u>	<u>Organisation</u>
1.	_____	_____	_____
2.	_____	_____	_____
3.	_____	_____	_____
4.	_____	_____	_____
5.	_____	_____	_____
6.	_____	_____	_____
7.	_____	_____	_____
8.	_____	_____	_____
9.	_____	_____	_____
10.	_____	_____	_____

HBC officer who will accompany the group: _____

Authorised by: _____ Signature: _____

on: _____

CCTV OPERATIVES

CONFIDENTIALITY OF OPERATIONS

PLEASE READ AND SIGN THE FOLLOWING DECLARATION

I _____ (Name)
of _____ (Address)

having applied for and obtained the position of Closed Circuit Television Operative declare the following:-

- 1) My appointment is to a security sensitive post within the meaning of BS5759 and BS7499 and I understand as such it is my responsibility to act in a manner that safeguards the security of the CCTV system, its customers, my colleagues and myself.
- 2) I will fulfil my duties as detailed in the "CCTV operations manual" and comply fully with the "Operational Code of Practice".
- 3) At no time either on or off duty will I divulge any information about the security aspect of my duties to another individual. This includes relating to occurrences, arrests, operations and the names of individuals observed.

Signed: _____

Date: _____

Name: _____

Witness: _____

Name: _____

COMPLAINTS PROCEDURE

Complaints direct at, and issued against, the CCTV system

Owner of the CCTV system: Harrogate Borough Council

Procedure

1. When issuing a verbal complaint, the complainant or person(s) acting on behalf of the complainant, will kindly be requested to translate the exact details of the complaint into a written letter. Any resulting correspondence is to be addressed to:
Director of Community
PO Box 787
Harrogate Borough Council
HG1 2AE
2. Upon receipt of any complaint, the Head of Safer Communities and the Community Safety & CCTV Manager will immediately be notified of the specific details and nature of the complaint and will respond accordingly.
3. Complaints received via the CCTV Control Room will be recorded in the incident/ occurrence log. A designated complaints file will be set up in order to hold information and associated correspondence of all complaints that are issued against the CCTV system and/or its owner. The contents of the complaints file will be subject to the conditions and provisions of the Data Protection legislation.
4. Where a complaint is considered to be of a serious nature, the Director of Community must appoint an impartial Inspector(s) who will monitor and oversee the development of the complaint, will ensure all procedures and guidelines are adhered to, and will make recommendations to the system's owner. Any person(s) who is/are appointed as an Inspector(s) must be approved by, will be accountable to, and will act on behalf of the Director.
5. The complainant, or complainants representatives (where applicable) will be notified in writing of:
 - (a) any significant developments that arise during the continuation of the complaint
 - (b) the resultant outcome of the complaint.

All complaints **must** be dealt with in strict confidentiality and with the utmost probity.