

Blaenau Gwent County Borough Council

Public Space CCTV System

Annual Monitoring Report
2020

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Key Note: *This report covers the period 1 September 2019 to 31 December 2020, and takes into account the period of time of the COVID-19 Pandemic when policies, operations and practices were significantly affected.*

For further details in relation to this Annual Report please contact:

Policy Team

Blaenau Gwent County Borough Council

Municipal Offices

Civic Centre

Ebbw Vale

Blaenau Gwent

NP23 6XB

CCTV@blaenau-gwent.gov.uk

Executive Summary

Senior Information Risk Officer Assurance Statement

As the Senior Information Risk Officer for Blaenau Gwent County Borough I am pleased to present this CCTV Annual Monitoring Report. The Report demonstrates the Council's progress made on our journey to compliance with the Surveillance Camera Commissioner's CCTV Codes of Practice.

The Council wholly funds, manages and operates fifty-seven CCTV cameras (53 fixed and 4 deployable units), in seven zones across the County Borough. We recognise that CCTV is not a panacea, but is a valued tool that we have at our disposal to make a significant contribution to public safety.

The effectiveness of CCTV relies on partnership working between the public, the Police and the Council. Where crimes or anti-social behaviour occur, the public must have the confidence to report these incidents to the Police and where appropriate the Council. The Police and Council will work in partnership with the public and other partners to consider the most appropriate, proportionate and necessary response to the community safety matters being reported, which may include the use of the Council's CCTV system. However, the law-abiding public should have confidence that the Council may need to legitimately record them going about their daily business in specified locations.

This report seeks to be more open and transparent about our compliance journey and to highlight the effectiveness of the Council's overt Public Space CCTV system as a valued resource to support partnership working.

The report also highlights key areas of future development on our continuous journey of improvement set out Appendix J.

Rhian Hayden
Chief Finance Officer (SIRO)
Blaenau Gwent County Borough Council

Introduction

In response to the introduction of the Crime and Disorder Act 1998 and its amending legislation, Blaenau Gwent County Borough Council became a lead responsible authority for Community Safety. As such they are required to work in partnership with other key public services to do all they reasonably can to prevent crime and disorder, anti-social, other behaviour adversely affecting the local environment, address the misuse of drugs, alcohol or other substances, and reoffending. To support the broader commitment to work in partnership to address such matters, the Council became the 'system owner' of an overt public space surveillance camera scheme.

The Protection of Freedoms Act 2012 (PoFA) introduced the regulation of public space surveillance cameras in England and Wales and the Home Office appointed a Surveillance Camera Commissioner, a role that is independent of government.

The Council must have due regard to, and comply with, the Surveillance Camera Commissioner's 'Surveillance Camera Code of Practice', developed in partnership with the Information Commissioner's Office, which aims to balance the need for cameras in public places with individual's right to privacy. The legislative landscape that surveillance cameras occupy is complex, however the Code draws all relevant legislation governing the use of surveillance cameras into one place, and therefore also acts as a good practice guide.

In June 2014, the Council commissioned Newport City Council to manage their CCTV surveillance camera scheme, which was then physically monitored 24/7 from the Newport CCTV Control Room.

In October 2018, the Council agreed to bring its camera surveillance scheme back 'in-house' early 2019 following the termination of a Service Level Agreement. However, this meant that for the first time, the CCTV scheme was reduced from a 24/7 monitored system, to a 'record only' system. The initial, and current locations of the CCTV cameras and zones were agreed in consultation with Gwent Police.

Since 2018, the Council has utilised the 12 guiding principles (Appendix A) contained within the Surveillance Camera Commissioner's Code of Practice, to support the development of a holistic approach to raising its standards and compliance. In taking this approach, the Council anticipates that individuals and wider communities have confidence that any deployment of its surveillance cameras are to deemed a necessary and proportionate response to protect and support them.

This CCTV Annual Monitoring Report covers the period 1 September 2019 to 31 December 2020 and covers the Council's journey to compliance. The report will:

- Provide an overview of the legal and policy framework for CCTV;
- Assess progress made to comply with the Surveillance Camera Code of Practice;
- Undertake an assessment of the effectiveness of the current CCTV overt fixed camera scheme; and
- Establish the forward work programme to further raise standards and compliance with the Codes of Practice.

Blaenau Gwent Public Space CCTV Surveillance Camera Scheme

The senior responsible officer for the Council is the Senior Information Risk Officer (SIRO), who is responsible for authorising the use of the public space surveillance cameras and for authorising any changes to the function of the CCTV Scheme.

The Council's Community Safety Team is responsible for the policy and operational management of the CCTV Scheme; supported by Technical Services. The Team works very closely with the Office of the Gwent Police Crime Commissioner to support the delivery of the Gwent Police and Crime Plan. Further, key departments of the Council work with Gwent Police as part of the local multi-agency Community Safety Hub, monitoring all matters relating to public safety.

Partners within the Hub use many sources of intelligence and evidence to inform the problem-orientated approach to deal with public safety matters. Information is shared safely and legally under the Wales Accord of the Sharing of Personal Information (WASPI) 'Information Sharing Protocol'. This approach involves assessment of vulnerability, threat, risk and harm and need, which is used to inform a series of holistic action plans. This bespoke arrangement could include, proactive education and prevention, intervention and support, which could include sign-posting to treatment. Only where necessary and proportionate, the Council and its partners will consider a broader range of legal powers and more intrusive means to manage the situation.

In the vast majority of cases, through proactive engagement with victims and their families, members of the community, elected members and offenders themselves, the partners are able to make more informed decisions on the employment of resources to resolve or address the community safety concerns. For this reason, it should be noted that CCTV is not a panacea, and is merely one tool in the extensive toolkit that the Council, Police and partner agencies can use to address public safety. However, there are times when the matters that need to be resolved, require legitimate consideration of more intrusive means through the use of CCTV, which in certain circumstances can make a valued contribution to public safety and security in protecting people and property.

Such circumstances rely on good partnership working between the public, the Police and the Council. For instance, the Council, wholly funds and manages all aspects of its CCTV security and system and operationally deploys them in agreed crime 'hotspot' locations; members of the public or local businesses report crime and anti-social behaviour incidents to the Police; and the Police determine what actions to take to investigate such issues. If the crimes and anti-social behaviour occur in areas where CCTV operate the Police will make lawful requests to the council for the CCTV footage to aid their investigations, and bring offenders to justice. For an example of how this works in practice, see Appendix I 'A Case Study'.

It is noted that a lawful request can also be received from other Public Authorities, legal and insurance companies or from members of the public under a Subject Access Request process. Under the current arrangements, subject to meeting the requirements, designated Council CCTV Operators from the Community Safety Team access the CCTV System, downloads the specified data and safely and legally shares the data with the approved parties.

Where CCTV is proposed as a potential option, the Council will consider the use of overt surveillance cameras in public places, whenever it evidences that use is:

- in pursuit of a legitimate aim;
- necessary to meet a pressing need;
- proportionate;
- effective, and compliant with any relevant legal obligations.

To guide the Council through the legal and practical requirements to comply with the above, the Council completes the Surveillance Camera Commissioner's Data Protection Impact Assessments (DPIA) for each CCTV Zone. The DPIAs will be published on the Council website and are reviewed annually or at any point when changes to the CCTV system are deemed necessary.

Blaenau Gwent Council currently operates fifty-three High Definition (up to 4K quality), fixed overt public space surveillance cameras, installed on 32 columns, in the following seven zones (Appendix B):

- Abertillery – 15
- Llanhilleth Train Station – 3
- Blaina – 2
- Brynmawr – 6
- Ebbw Vale – 12
- Cwm – 3
- Tredegar and Cefn Golau – 12

The CCTV system is operational 24 hours a day, 365 days a year. The system is not 'live' monitored by staff and functions as a 'record-only' system. Images from each hub are transmitted by standard broadband lines to the Main viewing facility located within the Civic Centre; which allows footage to be reviewed and downloaded when requested by the Council's designated CCTV Operators.

The dedicated wireless system consists of wireless mesh network. Where wireless network is unavailable due to location of the CCTV camera, a 4G mobile data network has been utilised for data transmission. The Council's 4G camera locations are:

- Blaina
- Cefn Golau, Tredegar
- Armoury Terrace, Ebbw Vale.

The 53 cameras have no pan, zoom or tilt facility and are therefore passive in respect of recording whatever is within the field of view. For this reason, public confidence to report crimes and significant anti-social behaviour within the CCTV zones, is essential to support the Police or enforcement agency investigations.

As well as the fixed 53 CCTV cameras, the Council has four deployable cameras. These are currently in test phase with Technical Services.

Each CCTV Zone is covered by the presence of bi-lingual signs (Welsh and English). The signs are placed so that the public are aware that they are entering a zone which is covered by surveillance cameras. The signs state the organisation responsible for the scheme, the purposes of the scheme and a contact telephone number.

The current DPIAs identifies that the specified purpose for the current CCTV system is to assist with the following objectives:

- The preservation of life and limb, to minimise the risk of harm to the vulnerable and public at large.
- The prevention and detection of crime.
- The investigation of crime by identifying offenders, potential victims and witnesses.
- The prosecution of offenders.
- The tendering of video and still images in evidence to the Police, other Law Enforcement Agencies and relevant Local Authority Departments for use in the Criminal Justice System.
- To reduce Anti-Social Behaviour.
- To promote the objectives of Gwent's Police and Crime Commissioner's Police and Crime Plan 2017-2021 and the Blaenau Gwent Community Safety Hub, to make Blaenau Gwent a safer place to live, work and visit.

The current DPIAs predominant lawful 'pressing-need' and operational requirement was evidenced from published Police crime data on <https://www.police.uk/>.

SCC's Survey of Local Authorities [England and Wales] Compliance with the Protection of Freedoms Act 2012

In early 2020 the Surveillance Camera Commissioner undertook a Survey of LA compliance, the findings of which were published in October 2020¹. The SCC noted "I unequivocally support LAs having the right to legitimately use surveillance camera technologies where it's both necessary and proportionate for them to do so. The caveat to my support however is that any such use must be lawful, ethical and conducted within a clear and transparent framework of legitimacy which can be held to effective and independent account".

The Survey was to gain a better understanding as to the extent to which Local Authorities were complying with their statutory responsibilities arising from Section 33(1) of the Protection of Freedoms Act 2012 (PoFA) and the Surveillance Camera Code of Practice, in connection with their use of overt surveillance camera systems in public places.

¹ <https://videosurveillance.blog.gov.uk/2020/10/20/survey-of-local-authorities-compliance-with-the-protection-of-freedoms-act-2012/>

In the published report the SCC made three recommendations for Local Authorities:

1. LAs should conduct a review of all surveillance camera systems they operate to establish whether those systems fall within the remit of section 29(6) PoFA. There should be processes in place that enable the LA to discharge their responsibilities effectively under the PoFA in respect of those systems and ensure they comply with the legislation.
2. LAs should ensure that effective governance arrangements are in place with all surveillance cameras they operate in public places across the breadth of their organisation.
3. LAs should consider whether there are sufficiently robust governance and oversight arrangements across the authority [...]

The above recommendations are being addressed as part of the Council's journey to compliance and progress made, contained in this Annual Monitoring Report.

CCTV Policy Developments

On our journey to compliance the Council has continued to strengthen its CCTV Policy framework. A key development during the scope of the reporting period has been the preparation of Blaenau Gwent's Public Space CCTV Code of Practice (Appendix C).

The Council's Code of Practice will be supplemented by a separate Public Space CCTV Procedure Manual, which will provide more detailed guidelines on all aspects of the day-to-day operation of the CCTV System. The Procedural Manual will be developed during 2021.

The Council currently has four deployable CCTV camera units and is working with Gwent Police and partners to implement a Problem-Orientated Partnerships model that will strengthen its partnership approach. Further the Council will develop a Deployable CCTV Camera Protocol, to aid the appropriate joint assessment of 'pressing need' to inform where justified, necessary and proportionate, the rapid deployment of deployable CCTV to address significant public safety concerns.

In the spirit of principle 3 of the SCC's Code of Practice, the Council will develop a CCTV webpage to increase the transparency around the governance of CCTV. This will build on the existing published information.

Annual Performance Monitoring Review

COVID-19 regulations for Wales, have seen a number of local and national lockdowns and significant business restrictions, given Blaenau Gwent's reported high COVID-19 rates when compared against other Welsh Local Authorities. In light of COVID-19, like many of the public sectors including those across the criminal justice system, the Council experienced significant disruption in terms of staffing and delivery of its services during most of 2020.

In response, the Community Safety Team worked from home throughout, which impacted the effectiveness of delivering a CCTV service. On two occasions during the COVID period, it became necessary for only very serious criminality or disorder to be dealt with by the designated CCTV Operators.

Further the Council experienced technical issues arising outside of their control, which reduced the availability of other Council staff and contractual staff to address such issues, though every effort was taken to minimize any disruption.

The breadth of the impact of COVID-19 within the field of public safety is yet to be determined. It is evident that the usual business model for public services was refocussed to respond to the global pandemic crisis during the response phase, and impacts will continue to affect public services going into the recovery phase.

COVID pressures also impacted on the Council's CCTV journey to compliance, which led to a delay in the production of this Annual Monitoring Report and a delay in the annual review of the DPIAs, which were finally reviewed and signed off by the SIRO in January 2020.

SIRO CCTV Meetings

The SIRO holds regular meetings with key authority leads involved in the provision or support of the policy, technical and operational aspects of the Council's CCTV system. There were four such meetings during the reporting period. The meetings allow for effective review and audit discussions of the DPIAs, and ensure we continue to make progress towards compliance and address any arising issues. The SIRO ensures timely submission of reports into the professional and political processes.

Elected Member Engagement

4 September 2019: Corporate Overview Scrutiny Committee under the item Forward Work Programme agreed for a joint position statement on CCTV to be presented at a future meeting. The Agenda and Papers are published on the Council website.

19 November 2019: In response to the agreed action from the meeting of the 4 September 2019, a progress update was provided to Corporate Overview and Scrutiny Committee. It was noted that a further progress report would be provided in January 2020. The Agenda and Papers are published on the Council website.

5 December 2019: Corporate Overview and Scrutiny considered the response of an action from their November meeting, 'Members requested that officers seek advice on whether a demonstration could be provided to Members'. In response the Head of Partnerships and Governance advised that this could be arranged.

12 February 2020: It is noted that the scheduled meeting of Corporate Overview and Scrutiny Committee for January 2020 was cancelled and taken forward in February. The Committee received a 'Position Statement on the Council's CCTV system'.

11 September 2020: The Council's Overview and Scrutiny meeting received a report entitled 'Position Statement on the Council's CCTV' covering the period during the Covid-19 Pandemic from April to August 2020, which is published on the Council's website.

3 & 5 February 2021: Member engagement sessions were offered to elected members, providing the opportunity for them to have their say on the Council's journey towards compliance with the SCC's CCTV Codes of Practice. There were four sessions covering the CCTV zones within the areas of Ebbw Fach North, Ebbw Fach South, Ebbw Fawr and Sirhowy. Councillors from each of these areas attended their respective session; with total of 37 of the 42 elected members taking part.

The member engagement session included a consultation on the following questions:

- Within your area, what are the community safety issues you are experiencing?
- Looking at the current CCTV Zones, can you describe the more specific community safety issues in those areas?
- Thinking about those Zones, how would you describe the effectiveness of the CCTV to address those community safety concerns?
- Thinking about the Council's journey to compliance, can you let us know what further information on CCTV you would like to receive and in what format?

Some of the key points raised relating to the Council's journey to compliance across these sessions were:

- Consideration whether the Council has sufficient number of CCTV cameras.
- Queries about the perceived effectiveness of the current CCTV camera system and the perceived benefits of monitoring 24/7.
- A need to understand how many times the Council provided CCTV footage to the Police to help their investigations.
- A need to understand how the Council's deployable cameras will be used and how will the Police and Council departments will be able to access these.
- Queries in relation to how some council service areas are dealing with crime and anti-social behaviour, and how CCTV could be used to deal with these matters.
- A broad consensus that the Council should balance the evidence base for deployment of CCTV with Police crime data, local authority data and community intelligence.
- Broadly accepted that CCTV is not the panacea and should be part of a wide-ranging community safety partnership response to crime and anti-social behaviour.
- Members recognising the value of more engagement sessions on the journey to compliance.

It is noted that most of the above points of note are addressed within this Annual Monitoring Report, though some points will be addressed as part of the on-going compliance journey and will be subject to future member engagement sessions and formal reporting through the democratic processes.

Subject Access Requests

There have been two subject access requests during the period of evaluation, which were dealt with in a timely manner. The Council's CCTV system records personal data i.e. images of individuals, or images, which gives away information about an individual. The Council is obligated to consider any subject access request by a member of the public, for CCTV images of the individual, subject to certain conditions being met. The process for Subject Access Request is published on the Council's website.

Freedom of Information Requests

There have been no Freedom of Information (FOI) requests in relation to the CCTV scheme during the period of evaluation. The FOI process is published on the Council's website.

Complaints

During the period of evaluation there have been no recorded complaints concerning the CCTV scheme. The Council has a corporate complaints process, which is published on the Council's website.

Training

During the reporting period, two members of staff from the Policy Team have successfully completed the 5-day CCTV Industry Standard Training Course, to operate the Council's CCTV System. The Council will ensure that all designated CCTV operators will receive appropriate training to ensure minimum requirements are met.

Crime and Anti-Social Behaviour Statistics

In order to inform a future strategic policy direction and any proposed changes to the current CCTV camera zones, we recognise that there are limitations in only considering Police reported crime statistics.

During the elected member engagement sessions, it was acknowledged that the Council could explore the opportunity to broaden the intelligence and evidence base, to include both Local Authority recorded crime and anti-social behaviour and consider community intelligence alongside the Police recorded data. This would place the Council in a better place to understand that richer picture of public safety and community concerns across Blaenau Gwent.

Such analysis could then be used by the Council to make more informed decisions on proposed changes to the current CCTV zones. Given the tight timescales, it was recognised that this improvement in the intelligence framework would be carried into a CCTV Forward Work Programme.

Crime

At the time of preparing this report, the latest available published Police crime and anti-social behaviour data extracted from Police.UK was only available to November 2020. Therefore, the below overview focuses on crime from January 2020 to November 2020. However, in order to provide a viable comparison between calendar years 2020 and 2019, an estimate was derived for December 2020 by applying the rate of crime and ASB over the previous 11 months.

Figure 1: Crime by 'Type', 2020 Estimate Compared to 2019

Figure 1 below shows an estimate for the volume of crime in 2020, (see note above) compared to the actual volume of crime in 2019. There is an estimate reduction of 6% in overall crime in 2020 compared to 2019. The largest potential reductions are for 'vehicle crime', 'other theft' and 'shoplifting'. However, be aware this is for provisional guidance only, based on estimates and the actual differences can't be discerned at this point in time.

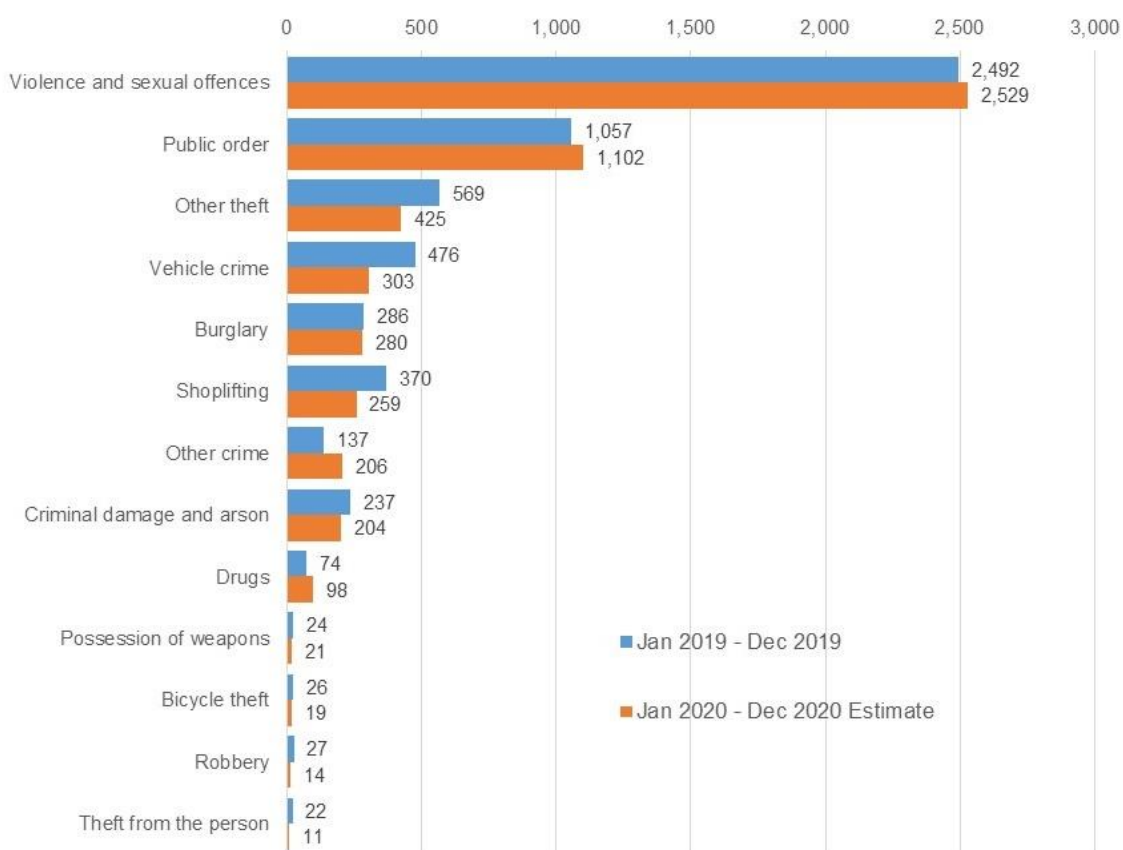
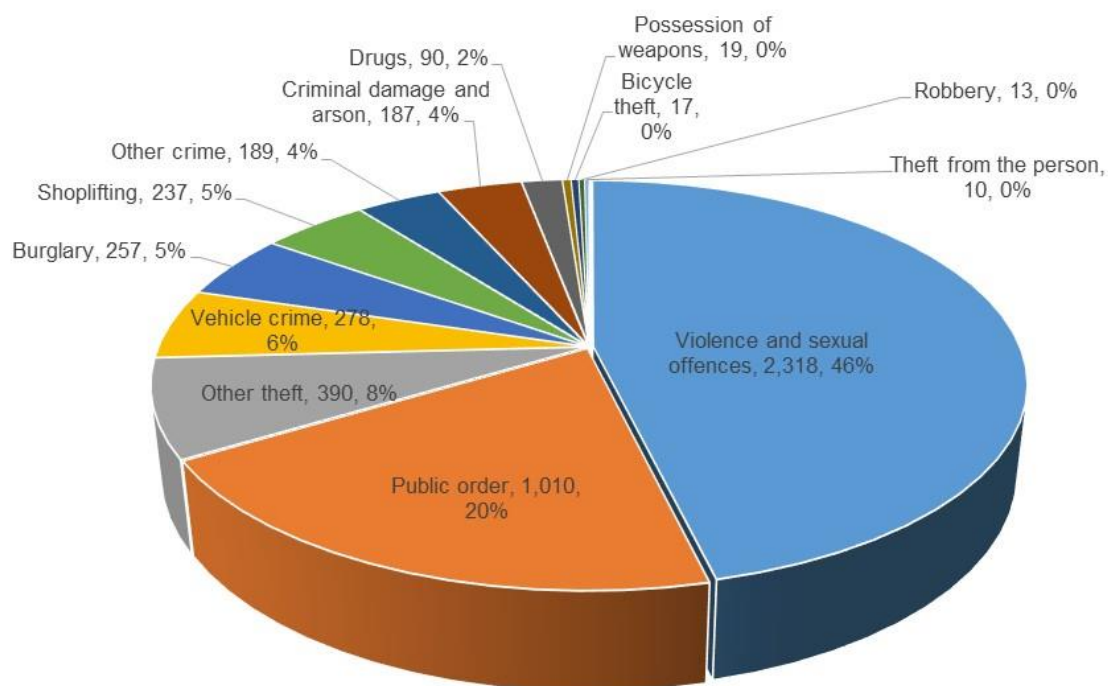


Figure 2: Crime by Type, Jan 2020 – Nov 2020

Figure 2 below shows the volume of crime by main offence type. 'Violence and sexual offences' accounted for 46% of crime (almost half) and 'public order offences' accounted for 20%. These two offence types alone accounted for 66% or two thirds of all crime.



Requests for Council CCTV Per Incident Type

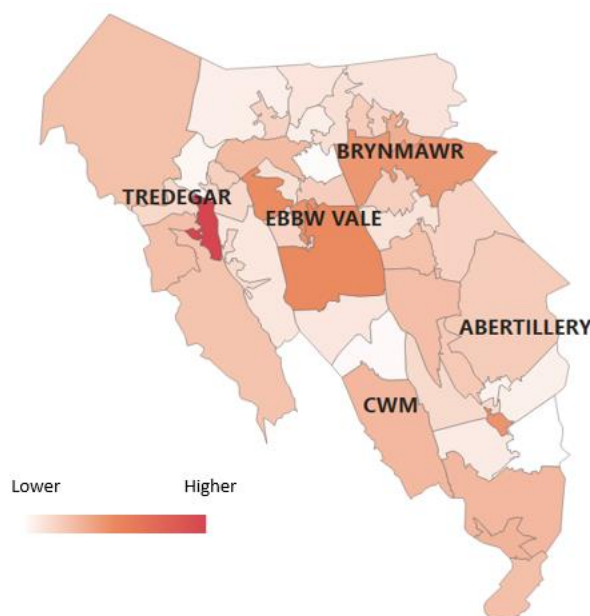
Table 1 below shows the number of times a lawful request was made the Council to CCTV to support an investigation across a number of crime and ASB incidents.

Incident Type	1 st September 2019 – 31 st December 2020
Violence and Sexual Offences	17
Public Order Offences	11
Theft Other	3
Vehicle Crime	5
Burglary	12
Shoplifting	1
Other Crime	4
Criminal Damage and Arson	17
Drugs	0
Offensive Weapons	1
Robbery	1
Theft from person	2
Road Traffic Collisions	13
Unspecified Suspicious incident	7
Anti-Social Behaviour	3
Missing Persons	3
Subject Access Request	2
Dangerous Driving	1

Figure 3: Crime by LSOA (lower super output area), Jan 2020 – Nov 2020

Figure 3 right shows the level of crime by LSOA. (lower super output area). There are 47 LSOA's in Blaenau Gwent. See Appendix D for full list of LSOA level crime and Appendix E for locations with 20 or more crimes. The LSOA's with the 6 highest number of crimes are:

- 'Tredegar Central and West 4' which experienced 341 crimes or almost 7% of all crime;
- 'Ebbw Vale South 2' (190 crimes, 3.8%);
- 'Ebbw Vale North 2' (187 crimes, 3.7%);
- 'Ebbw Vale South 3' (177 crimes, 3.7%);
- 'Abertillery 2' (177 crimes, 3.7%) and
- 'Nantyglo 1' (172 crimes, 3.4%).



Anti-Social Behaviour

There were 3,034 ASB incidents between January and November 2020 (11 months) compared to 1,513 over the full calendar year in 2019, in increase of 101% despite the shorter reporting period. Using an estimate of ASB for the full calendar year 2020 (by applying the rate of ASB over the previous 11 months) there are 3,310 incidents, a potential increase of 119% compared to 2019.

Figure4: ASB by LSOA (lower super output area), Jan 2020 – Nov 2020

Figure 4 right shows the level of ASB by LSOA (lower super output area). See Appendix F for full list of LSOA level ASB and Appendix G for locations with 20 or more ASB incidents. The LSOA's with the 5 highest number of ASB incidents account for almost one quarter (23%) of ASB. The five LSOAs are:

- 'Tredegar Central and West 4' which experienced 185 incidents or 6.1% of all ASB;
- Nantyglo 1' (144 incidents, 4.7%);
- 'Blaina 2' (129 incidents, 4.3%)
- 'Brynmawr 3' (125 incidents, 4.1%) and
- 'Ebbw Vale South 2' (114 incidents, 3.8%).

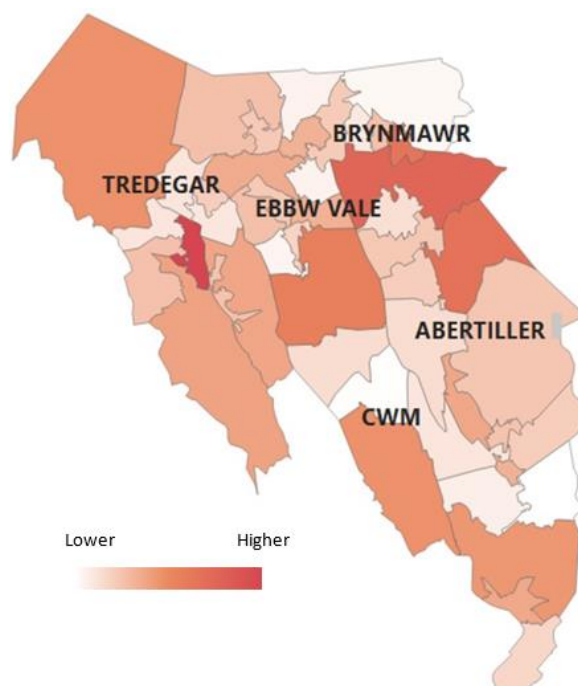


Figure 5: Anti-Social Behaviour – January 2019 to November 2020

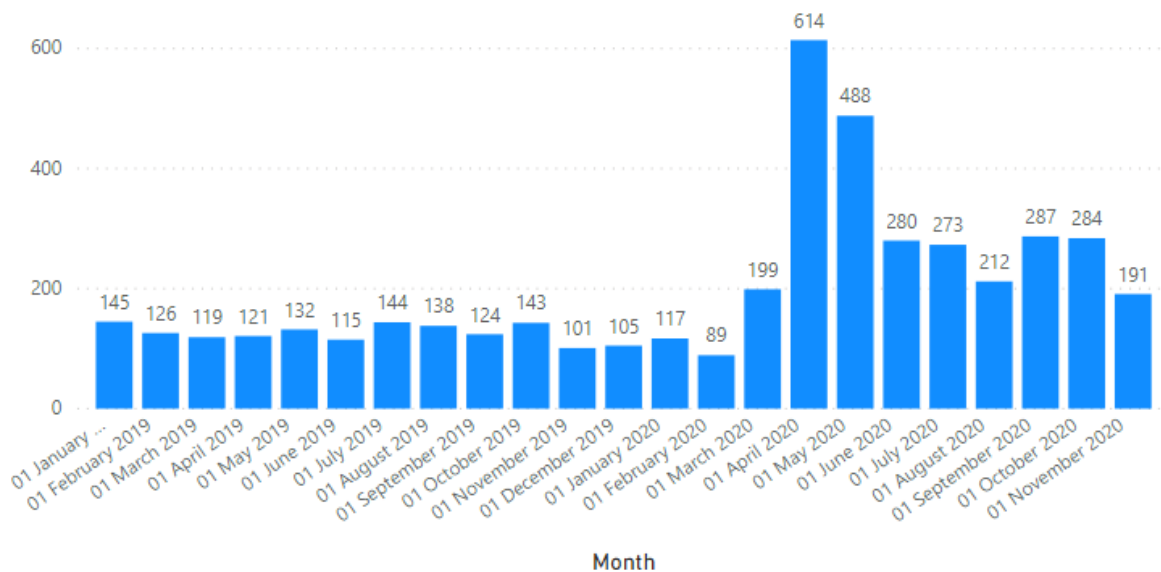


Figure 5 above shows ASB by month from January 2019 to November 2020. This shows a significant increase from March 2020 with highest numbers experienced in April 2020. Allied to the excellent weather conditions, some of this increase could be attributed to the significant changes on people's lives brought about by COVID-19 and subsequent non-compliance with regulations during lockdowns, firebreaks and local restrictions due to the Covid-19 pandemic - the timing of which coincides with the increased incidents.

Figure 6: Crime by 'Last Outcome Category', Jan 2020 – Nov 2020

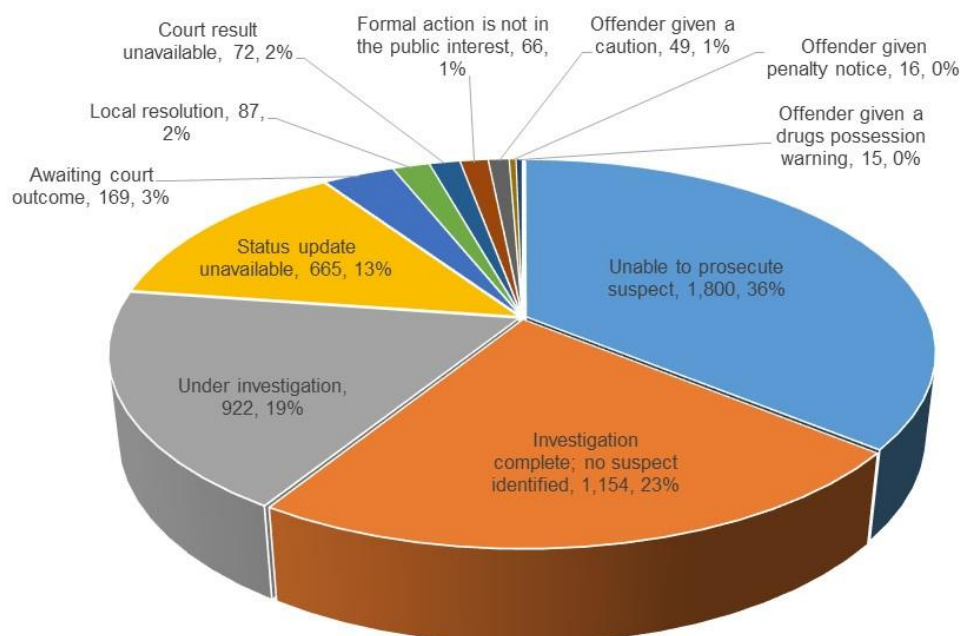


Figure 6 above shows 'last outcome category' of crime. For over a third of crimes (36%), it was not possible to prosecute the suspect, while for 23% of crimes no suspect was identified. Although at this stage, 19% of crimes were still under investigation and 3% were awaiting court outcome.

Council CCTV Provided to Aid Investigations

Table 2 below relates to the period 1 September 2019 – 31 December 2020 and the number of occasions a request was made to the Council for CCTV data, and the number of times evidence bags were provided.

Request Received From:	Number of Requests Received	Number of CCTV Evidence Bags provided
Police	85	34
Member of Public	13	1 (Subject Access Request)
Insurance	4	1
Court	1	1
Total	103	37

Note: Number presented in Appendix B will not match the figure presented above as some requests call on multiple cameras.

Occasions When Council CCTV Data Could Not Be Provided

Table 3 below identifies the number of times and reason CCTV was unavailable to share, following a request for footage. Of 103 requests, CCTV footage was unavailable on 66 occasions.

Reason	Number
The footage was not available or could not be provided for technical reasons (See below Technical Issues)	29
The request was out of the range of the CCTV cameras	13
The request was made but not pursued further by the requester - No further action	10
The footage was checked but contained nothing of evidential value	9
The request was received too late (the system had overwritten any available footage)	2
Unable to provide CCTV due to significantly reduced service during COVID	2
Request to 'live' view multiple cameras - no capacity or facility to do so.	1
Total	66

Technical Issues

Since the system has been installed the following technical issues have occurred:

- Wireless networks in each town centre needed reconfiguration to avoid interference from external Wi-Fi networks. To mitigate this the contractor proactively with the Council's Technical Services involvement arranged for the Manufacturer to attend site to advise on set-up.
- Due to age of existing CCTV columns some water ingress has occurred resulting in electrical faults. Water ingress has since been prevented and faults rectified.
- Premature failure of power supplies to Wi-Fi equipment due to manufacturing defect occurred, replacement power supplies were provided and installed.
- Broadband connectivity to main viewing centre does drop out on occasion due to issues with local router, Technical Services regularly monitor system and reset router when required. Technical Services have engaged with SRS to investigate feasibility and costs of increasing data speeds to local hub sites.
- 1 Camera fault occurred, contractor resolved during implantation.

- Damage to Wi-Fi transmitting equipment occurred in Cwm, replacement unit has been installed.
- Brynmawr, CCTV cameras electrical supply derived from old Library which has been transferred to the Brynmawr Cinema therefore electrical supply needed reconfiguration to be supplied from other source.
- Deployable required customised fabricated bracketry to allow universal mounting.
- Blaina CCTV cameras electrical supply was derived from an old council building which was sold to a third party; this resulted to a loss of supply for the cameras. Therefore, a new electrical supply was configured from a separate public supply via a feeder pillar.
- 4G (mobile transmission) cameras Cefn Golau, Tredegar.

Over and above the noted challenges, there are a number of further technical issues that affect performance of the CCTV system, most notably:

- Broadband connectivity of the Council's Designated CCTV Operator accessing the network to view live feed of cameras.
- Transient Wi-Fi and power fluctuations issues affecting reliability of CCTV units and the system.
- Wi-Fi connection download speeds are slower compared to a hardwire broadband system which has a consequence on the speed of downloading footage.

As a result of the technical issues, some of which are on-going, Technical Services are increasingly reliant on the maintenance contractor to manually download footage directly from cameras in order to provide footage promptly upon receipt of a lawful request.

Technical Services Maintenance

The maintenance for the CCTV system has proven to be more time consuming than predicted, particularly at the early stages of the system being operational. This has been due to a number of different factors, however, the main factor has been the integration of newer technology on old existing infrastructure (water ingress etc.)

Technical Services are carrying out weekly checks of all CCTV cameras to ensure units are fully powered and are in recording mode. (See attached Appendix H for weekly schedule commencing 4th January).

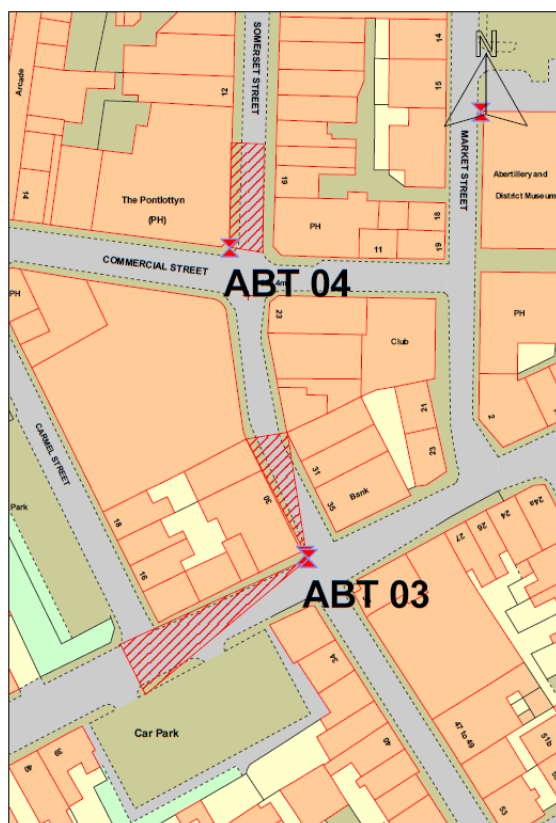
The current CCTV Contractor has been appointed to carry out an annual inspection of the system and the reactive repair and reactive maintenance of the whole system until September 2022.

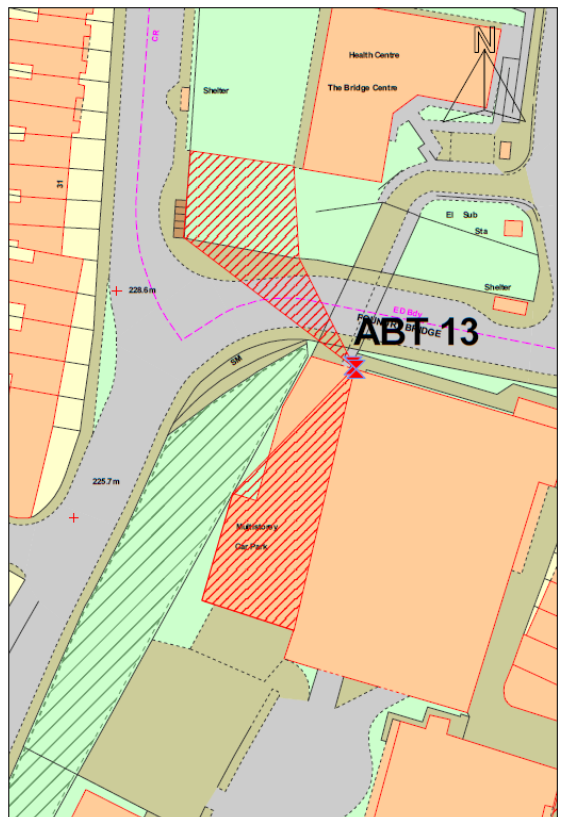
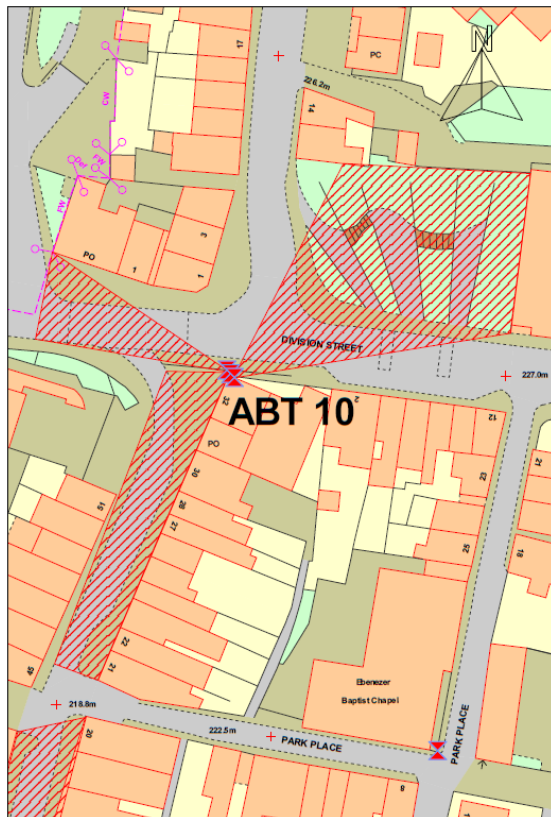
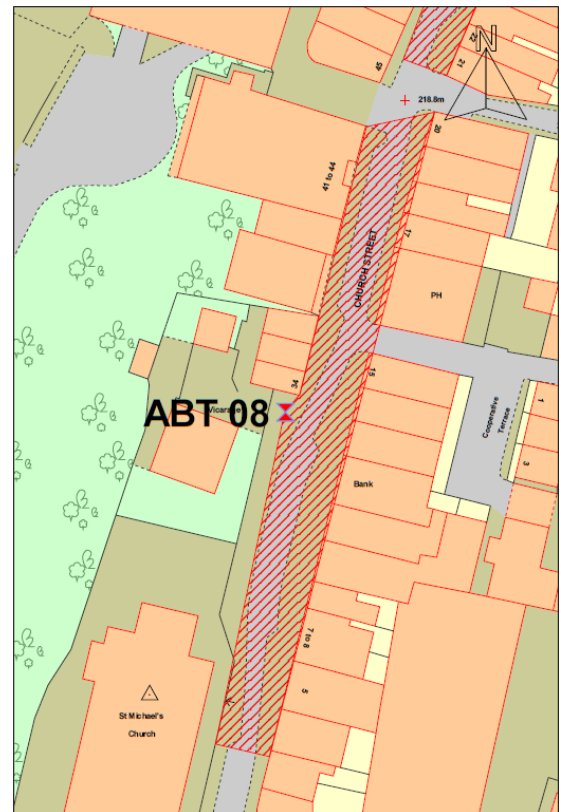
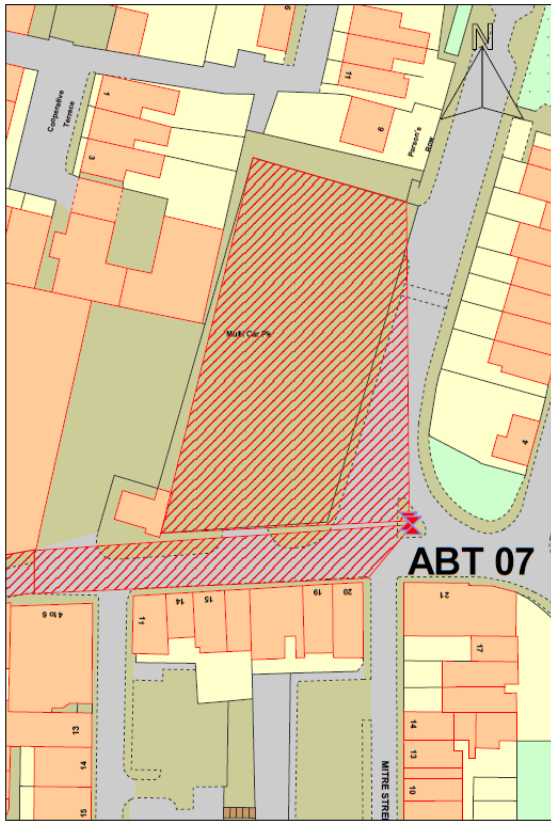
Appendix A: 12 Principles of the Code of Practice

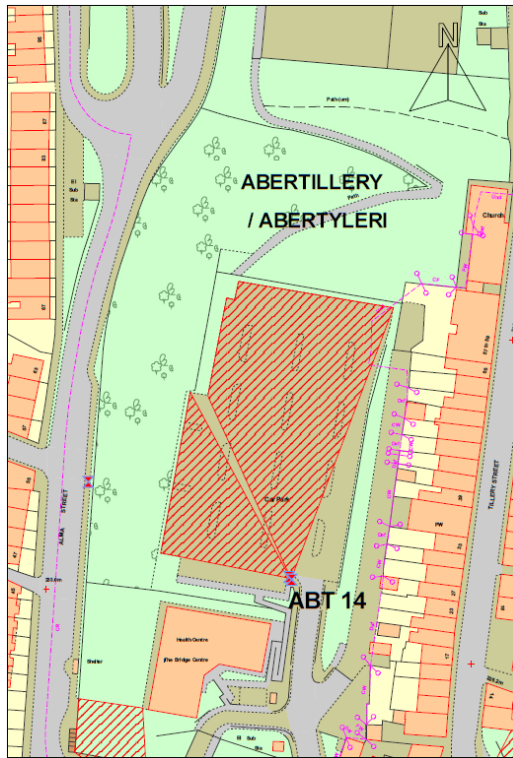
1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
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.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

Appendix B: CCTV Cameras in each Camera Zone and Requests for Footage between 1st September 2019 – 31st December 2020

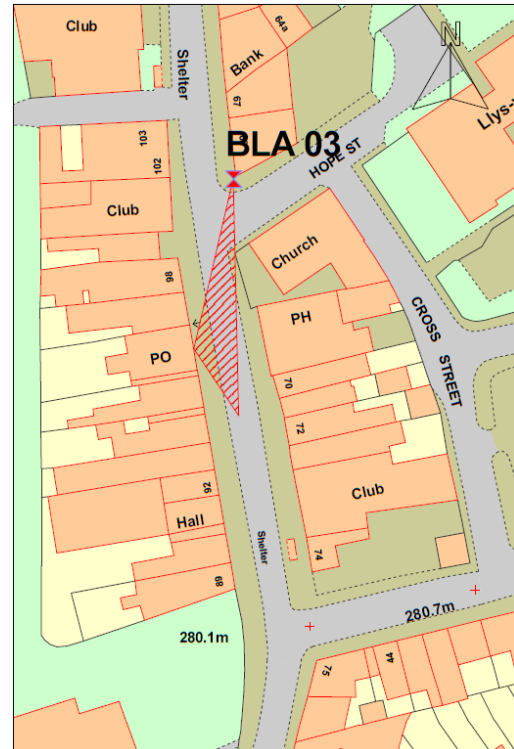
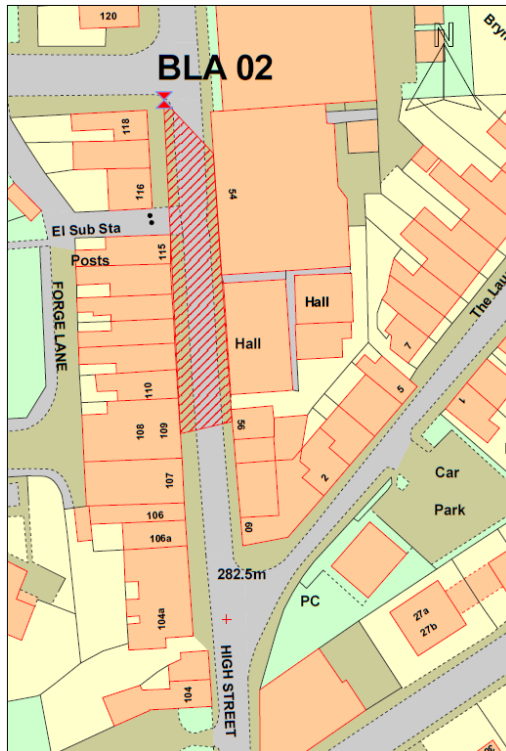
Abertillery Zone			
#	Camera Location number	Street Location	No. of Incidents
1	ABT 03	Junction Somerset Street and King Street	15
2	ABT 03		
3	ABT 04	Somerset Street	
4	ABT 06	High Street	6
5	ABT 06		
6	ABT 07	Intersection of High Street and Division Street	5
7	ABT 07		
8	ABT 08	Church Street Central	7
9	ABT 10	Outside Trinity Chapel, Division Street	1
10	ABT 10		
11	ABT 10		
12	ABT 13	Anvil Court / Foundry Bridge	2
13	ABT 13		
14	ABT 14	Foundry Bridge Car Park	6
15	ABT 14		



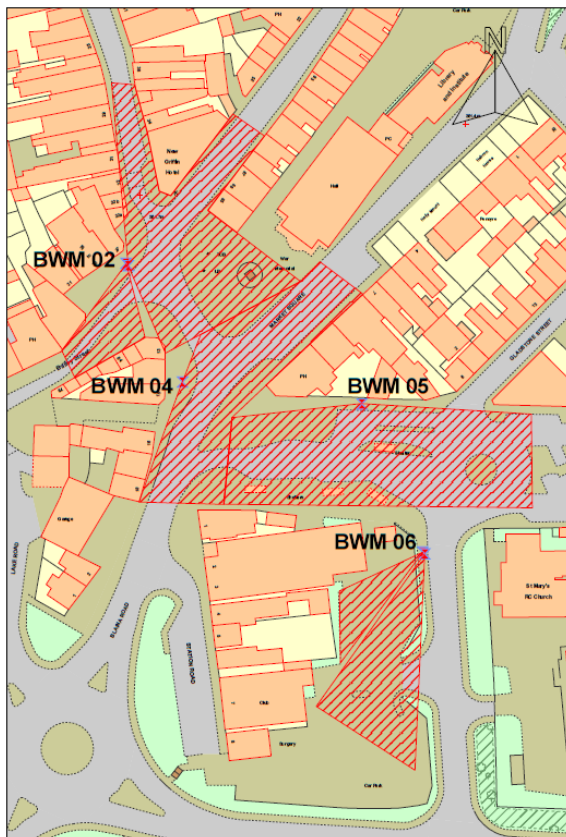




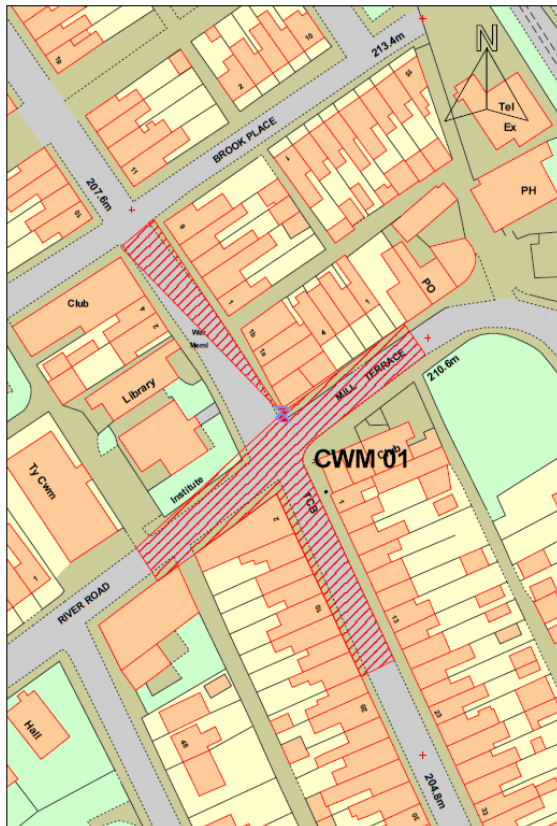
Blaina Zone			
#	Camera Location number	Street Location	No. of Incidents
1	BLA02	High Street	5
2	BLA03		



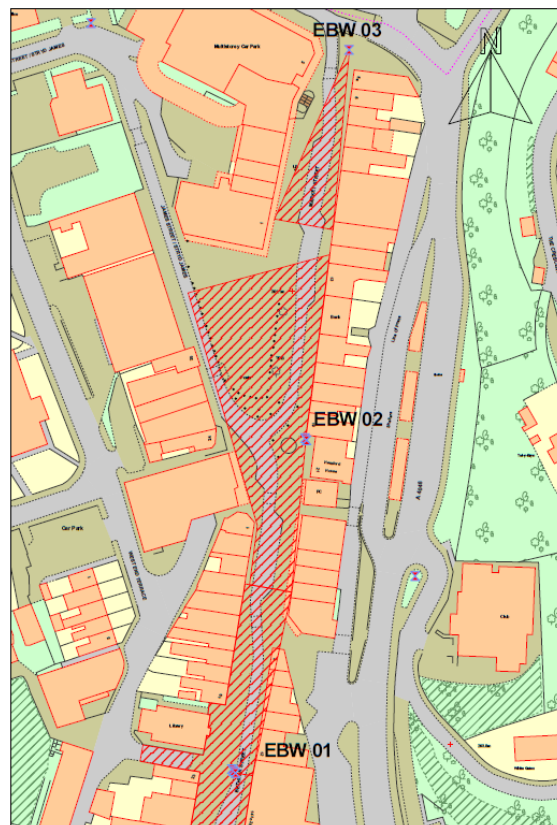
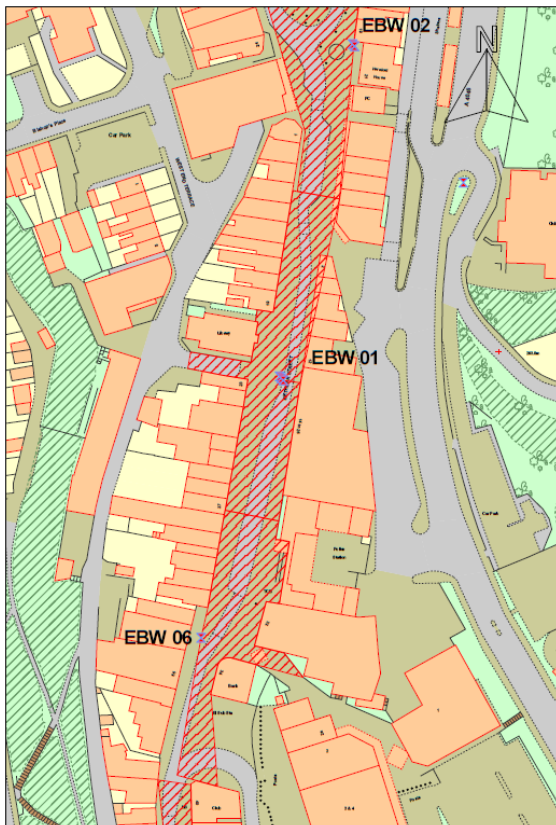
Brynmawr Zone			
#	Camera Location number	Street Location	No. of Incidents
1	BMW 02	Bailey Street	6
2	BMW 02		
3	BWM 04	Market Street and Bailey Street	4
4	BWM 05	Bus Station	2
5	BMW 06	Opposite St Marys Roman Catholic Church	0
6	BWM 06		

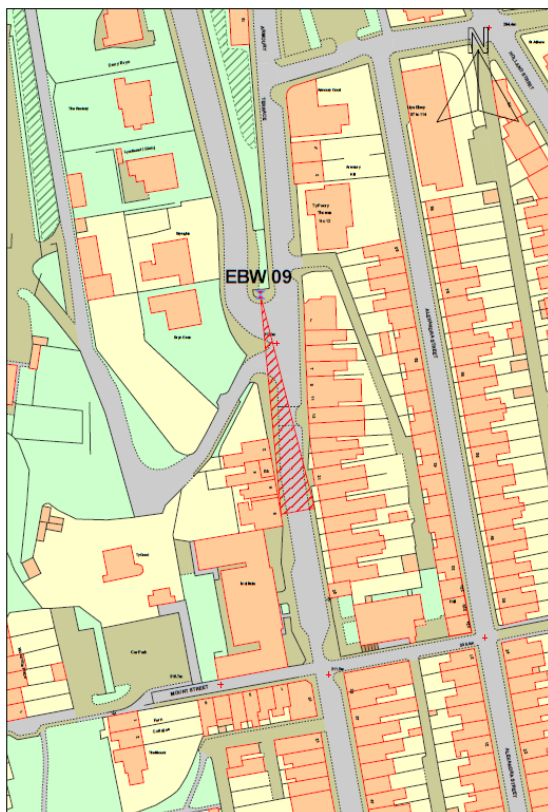
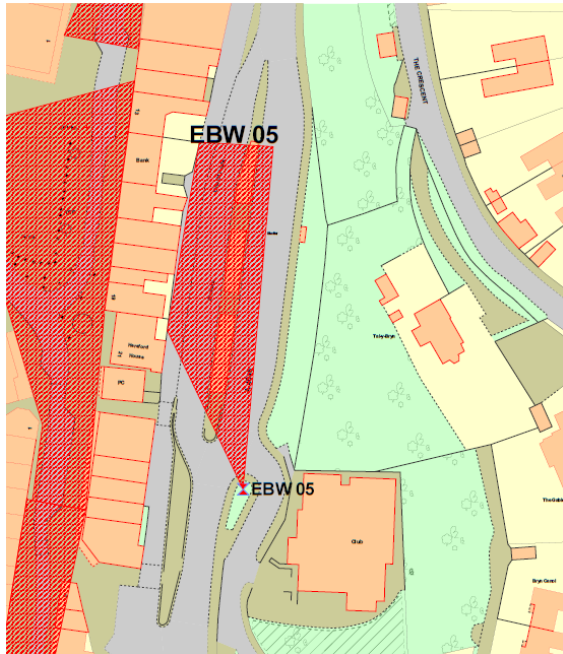


Cwm Zone			
#	Camera Location number	Street Location	No. of Incidents
1	CWM 01	Junction Mill Street and Canning Street	4
2	CWM 01		
3	CWM 01		

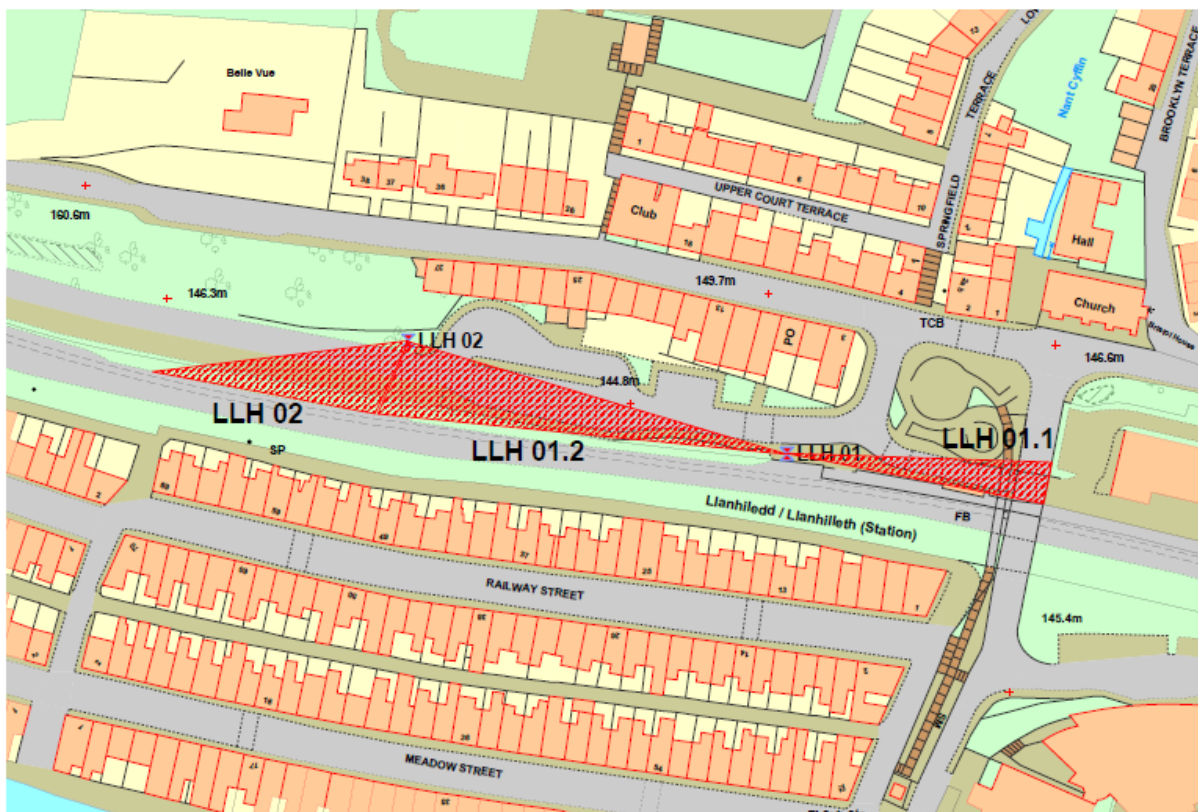


Ebbw Vale Zone			
#	Camera Location number	Street Location	No. of Incidents
1	EBW 01	Bethcar Street, opposite Library	8
2	EBW 01		
3	EBW 01		
4	EBW 02	Intersection of Market Street and Bethcar Street	8
5	EBW 02		
6	EBW 03	Market Street	5
7	EBW 05	A4046 outside Ex-Servicemen's Club	2
8	EBW 06	Bethcar Street	3
9	EBW 07	Bethcar Street	5
10	EBW 07		
11	EBW 07		
12	EBW 09	Armoury Terrace	2

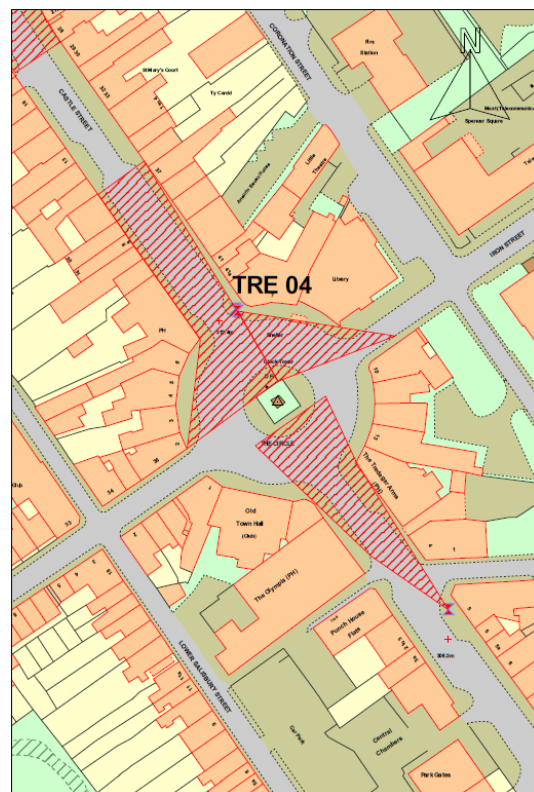
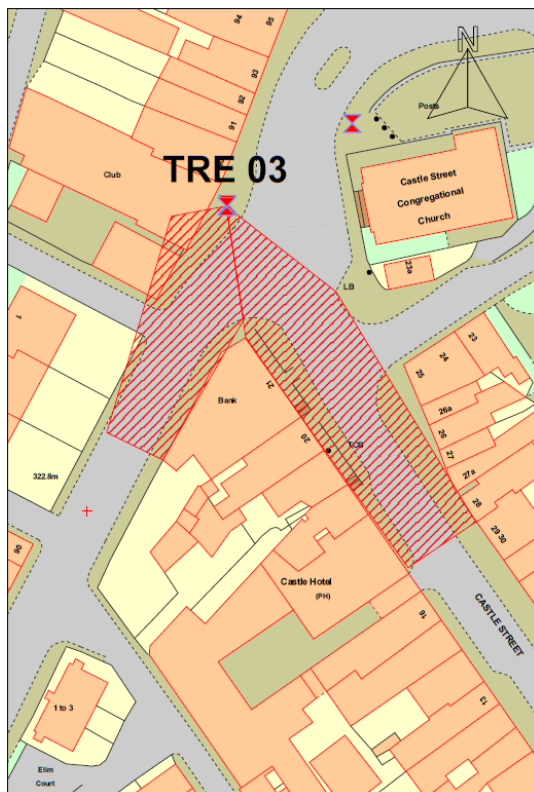


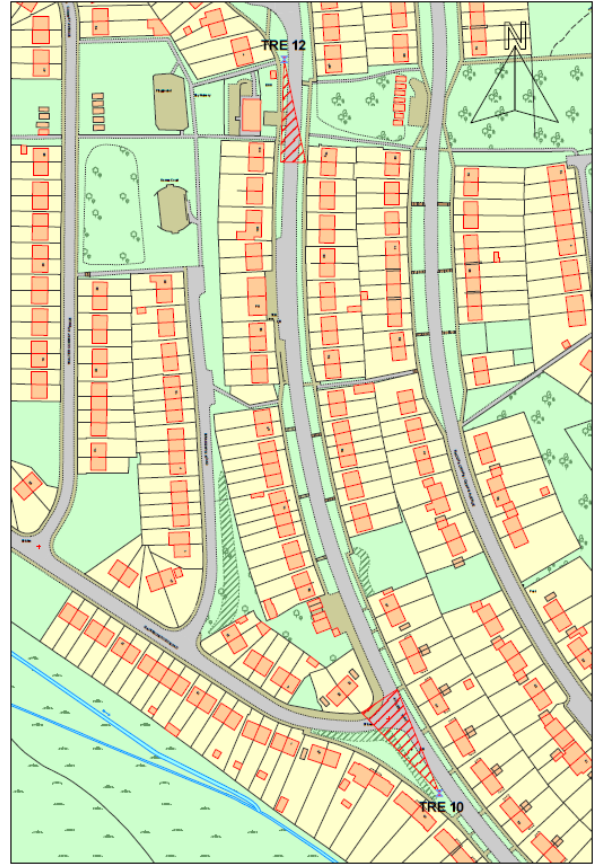
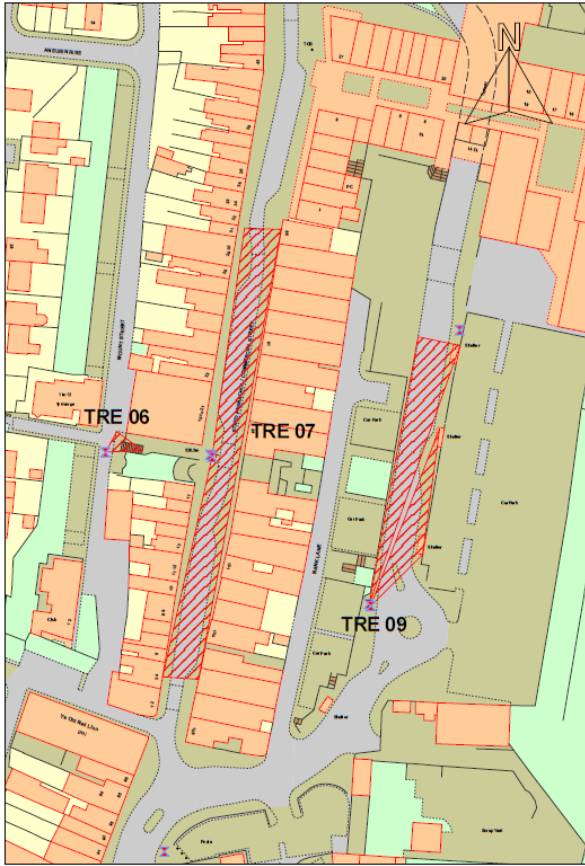


Llanhilleth Zone			
#	Camera Location number	Street Location	No. of Incidents
1	LLH 01	Llanhilleth Railway Station	2
2	LLH 01		
3	LLH 02		



Tredegar Zone			
#	Camera Location number	Street Location	No. of Incidents
1	TRE 03	Junction of Castle Street - Queen Victoria Street	8
2	TRE 03		
3	TRE 04	Corner of Castle Street - The Circle – Morgan Street	4
4	TRE 04		
5	TRE 04		
6	TRE 06	Mount Street steps leading to Commercial Street	1
7	TRE 07	Commercial Street	8
8	TRE 07		
9	TRE 09	Bus Stops – Roundabout to shopping centre	2
10	TRE 09		
11	TRE 10	Attlee Way adjacent junction Gainsborough Road	3
12	TRE 12	Junction of Attlee Way and Attlee Close	2





Appendix C: Blaenau Gwent's Public Space CCTV Code of Practice

The web link will be provided.

Appendix D: Crime by LSOA (lower super output area), Jan 2020 – Nov 2020

LSOA Name	Jan 20 - Nov 20	Pct of total	Rank
Tredegarr Central and West 4	341	6.8%	1
Ebbw Vale South 2	190	3.8%	2
Ebbw Vale North 2	187	3.7%	3
Ebbw Vale South 3	177	3.5%	4
Abertillery 2	177	3.5%	5
Nantyglo 1	172	3.4%	6
Brynmaur 3	143	2.9%	7
Llanhilleth 3	135	2.7%	8
Llanhilleth 2	131	2.6%	9
Cwm 2	131	2.6%	10
Badminton 1	127	2.5%	11
Blaina 3	123	2.5%	12
redegar Central and West 2	121	2.4%	13
Llanhilleth 1	121	2.4%	14
Sirhowy 3	120	2.4%	15
Blaina 1	119	2.4%	16
Tredegarr Central and West 1	116	2.3%	17
Cwmtillery 1	109	2.2%	18
Cwmtillery 2	106	2.1%	19
Brynmaur 2	104	2.1%	20
Ebbw Vale North 1	103	2.1%	21
Nantyglo 2	102	2.0%	22
Sirhowy 2	101	2.0%	23
Blaina 2	97	1.9%	24
Rassau 2	97	1.9%	25
Brynmaur 4	94	1.9%	26
Ebbw Vale South 1	94	1.9%	27
Tredegarr Central and West 3	89	1.8%	28
Sirhowy 4	89	1.8%	29
Georgetown 2	87	1.7%	30
Abertillery 1	87	1.7%	31
Beaufort 1	81	1.6%	32
Ebbw Vale North 3	79	1.6%	33
Nantyglo 3	77	1.5%	34
Brynmaur 1	76	1.5%	35
Beaufort 2	74	1.5%	36
Georgetown 1	72	1.4%	37
Cwm 3	71	1.4%	38
Six Bells 1	66	1.3%	39
Rassau 1	63	1.3%	40
Beaufort 3	63	1.3%	41
Abertillery 3	60	1.2%	42
Cwmtillery 3	57	1.1%	43
Sirhowy 1	52	1.0%	44
Cwm 1	48	1.0%	45
Badminton 2	45	0.9%	46
Six Bells 2	41	0.8%	47
Total	5,015	100.0%	

Appendix E: Crime Location (within LSOA), January 2020 – November 2020 For locations with 20 or more crimes

Crime - Location within LSOA	Jan 20 - Nov 20	Pct of total	Rank
On or near Parking Area within Tredegar Central and West 4	47	0.9%	1
On or near Supermarket within Tredegar Central and West 4	44	0.9%	2
On or near Parking Area within Ebbw Vale South 2	40	0.8%	3
On or near Waundeg within Sirhowy 3	39	0.8%	4
On or near Attlee Close within redegar Central and West 2	38	0.8%	5
On or near Pedestrian Subway within Tredegar Central and West 4	36	0.7%	6
On or near Barley Field Road within Brynmawr 3	36	0.7%	7
On or near A4047 within Badminton 1	36	0.7%	8
On or near Waunheulog within Nantyglo 1	33	0.7%	9
On or near Park Row within Tredegar Central and West 1	32	0.6%	10
On or near Nightclub within Tredegar Central and West 4	32	0.6%	11
On or near Petrol Station within Badminton 1	31	0.6%	12
On or near Glan Ebbw within Blaina 3	31	0.6%	13
On or near Supermarket within Abertillery 2	30	0.6%	14
On or near St James Way within Georgetown 1	30	0.6%	15
On or near Bus/Coach Station within Nantyglo 1	30	0.6%	16
On or near Mount Pleasant Estate within Llanhilleth 2	29	0.6%	17
On or near Bethcar Street within Ebbw Vale South 2	28	0.6%	18
On or near Hospital within Ebbw Vale South 3	28	0.6%	19
On or near Brynawelon within Nantyglo 1	28	0.6%	20
On or near East Pen-Twyn within Blaina 2	26	0.5%	21
On or near Bryn Pica within Sirhowy 2	25	0.5%	22
On or near Eureka Place within Ebbw Vale South 3	25	0.5%	23
On or near Parking Area within Abertillery 1	24	0.5%	24
On or near Tredegar Road within Ebbw Vale South 1	24	0.5%	25
On or near Gwaun Helyg Road within Ebbw Vale North 2	24	0.5%	26
On or near Upper Salisbury Street within Tredegar Central and West 4	23	0.5%	27
On or near Parking Area within Blaina 1	23	0.5%	28
On or near Petrol Station within Sirhowy 4	23	0.5%	29
On or near Heol Helig within Brynmawr 2	23	0.5%	30
On or near Graig Terrace within Cwm 2	23	0.5%	31
On or near Valley View Road within Cwmtillery 2	22	0.4%	32
On or near Supermarket within Ebbw Vale North 3	21	0.4%	33
On or near Peacehaven within Georgetown 2	21	0.4%	34
On or near Rhoslan within Sirhowy 2	21	0.4%	35
On or near Arael View within Cwmtillery 1	21	0.4%	36
On or near Porters Road within Nantyglo 1	20	0.4%	37
On or near Libanus Road within Ebbw Vale North 1	20	0.4%	38
On or near Railway Street within Llanhilleth 3	20	0.4%	39
On or near Heol-Yr-Ysgol within Ebbw Vale North 2	20	0.4%	40
On or near Heol Gwyn Lliw within Beaufort 1	20	0.4%	41
On or near Garden Street within Ebbw Vale South 3	20	0.4%	42
On or near A4046 within Badminton 1	20	0.4%	43

Appendix F: Anti-Social Behaviour by LSOA (lower super output area), Jan 2020 – Nov 2020

LSOA	Jan 20 - Nov 20	Pct	Rank
Tredegar Central and West 4	185	6.1%	1
Nantyglo 1	144	4.7%	2
Blaina 2	129	4.3%	3
Brynmawr 3	125	4.1%	4
Ebbw Vale South 2	114	3.8%	5
Cwm 2	96	3.2%	6
Sirhowy 3	96	3.2%	7
Llanhilleth 2	92	3.0%	8
Tredegar Central and West 1	84	2.8%	9
Georgetown 1	82	2.7%	10
Cwmtillery 1	81	2.7%	11
Llanhilleth 3	80	2.6%	12
Badminton 1	78	2.6%	13
Abertillery 2	74	2.4%	14
Beaufort 3	74	2.4%	15
Ebbw Vale North 1	74	2.4%	16
Rassau 1	64	2.1%	17
Ebbw Vale North 2	64	2.1%	18
Brynmawr 4	63	2.1%	19
redegar Central and West 2	63	2.1%	20
Georgetown 2	62	2.0%	21
Cwmtillery 3	61	2.0%	22
Cwmtillery 2	60	2.0%	23
Nantyglo 3	58	1.9%	24
Rassau 2	57	1.9%	25
Ebbw Vale North 3	57	1.9%	26
Beaufort 1	56	1.8%	27
Abertillery 3	55	1.8%	28
Blaina 1	54	1.8%	29
Sirhowy 2	54	1.8%	30
Ebbw Vale South 3	50	1.6%	31
Llanhilleth 1	48	1.6%	32
Cwm 3	44	1.5%	33
Blaina 3	44	1.5%	34
Nantyglo 2	42	1.4%	35
Tredegar Central and West 3	38	1.3%	36
Abertillery 1	38	1.3%	37
Sirhowy 1	38	1.3%	38
Sirhowy 4	37	1.2%	39
Brynmawr 2	36	1.2%	40
Six Bells 1	32	1.1%	41
Beaufort 2	29	1.0%	42
Badminton 2	29	1.0%	43
Ebbw Vale South 1	27	0.9%	44
Brynmawr 1	25	0.8%	45
Cwm 1	21	0.7%	46
Six Bells 2	20	0.7%	47
Total	3,034	100.0%	

Appendix G: Anti-Social Behaviour by LSOA (lower super output area), Jan 2020 – Nov 2020 for locations with 20 or more ASB incidents.

Location within LSOA - Anti Social Behaviour	Jan 20 - Nov 20	Pct	Locations
On or near Barley Field Road within Brynmawr 3	39	1.3%	1
On or near Aubrey Terrace within Cwm 2	39	1.3%	2
On or near Sports/Recreation Area within Sirhowy 3	38	1.3%	3
On or near St James Park within Georgetown 1	32	1.1%	4
On or near United Way within Tredegar Central and West 4	31	1.0%	5
On or near A4046 within Badminton 1	29	1.0%	6
On or near Bus/Coach Station within Nantyglo 1	27	0.9%	7
On or near Lakeside Close within Nantyglo 1	27	0.9%	8
On or near Park/Open Space within Tredegar Central and West 1	26	0.9%	9
On or near Supermarket within Ebbw Vale North 3	25	0.8%	10
On or near Parking Area within Tredegar Central and West 4	24	0.8%	11
On or near East Pen-Twyn within Blaina 2	24	0.8%	12
On or near Supermarket within Tredegar Central and West 4	24	0.8%	13
On or near Park/Open Space within Blaina 2	23	0.8%	14
On or near Petrol Station within Badminton 1	22	0.7%	15
On or near Parking Area within Ebbw Vale South 2	21	0.7%	16
On or near Attlee Close within redegar Central and West 2	21	0.7%	17
On or near Nightclub within Tredegar Central and West 4	20	0.7%	18
On or near York Terrace within Cwm 2	19	0.6%	19
On or near Victor Road within Cwmtillery 3	19	0.6%	20
On or near Parking Area within Georgetown 2	18	0.6%	21
On or near Bethcar Street within Ebbw Vale South 2	18	0.6%	22
On or near Parking Area within Cwmtillery 1	17	0.6%	23
On or near Sports/Recreation Area within Cwmtillery 1	17	0.6%	24
On or near Park/Open Space within Cwmtillery 2	17	0.6%	25
On or near Heol Gwyn Lliw within Beaufort 1	17	0.6%	26
On or near Roundhouse Close within Nantyglo 1	17	0.6%	27
On or near Stonebridge Road within Rassau 1	17	0.6%	28
On or near Nant-Y-Cwm within Llanhilleth 2	17	0.6%	29
On or near Tillery Street within Abertillery 3	16	0.5%	30
On or near Parking Area within Brynmawr 3	16	0.5%	31
On or near Mount Pleasant Estate within Llanhilleth 2	16	0.5%	32
On or near Phillips Close within Rassau 2	16	0.5%	33
On or near Waundeg within Sirhowy 3	16	0.5%	34
On or near St James Way within Georgetown 1	16	0.5%	35
On or near Gladstone Street within Brynmawr 3	16	0.5%	36
On or near Parking Area within Llanhilleth 3	16	0.5%	37
On or near Supermarket within Abertillery 2	15	0.5%	38
On or near Rhoslan within Sirhowy 2	15	0.5%	39
On or near Club Row within Blaina 2	15	0.5%	40

Appendix H: Maintenance Schedule 4 January 2021

CAMERA NUMBER	LOCATION	Street Name	On/Off	Comment
Tre01.1	Tredegar Town Centre	Corner of Castle Street and The Circle	On	
Tre01.2			On	
Tre02.1	Tredegar Town Centre	Morgan Street	On	
Tre03.1	Tredegar Town Centre	Top of Castle Street & Queen Victoria Street Opposite	On	
Tre03.2		Barclays Bank	On	
Tre05.1	Tredegar Town Centre	Midway Commercial Street at seating area	On	
Tre05.2			On	
Tre06.1	Tredegar Town Centre	Mount Street Steps leading to Commercial Street	Off	Under IDS investigation
Tre09.1	Tredegar Town Centre	Roundabout to Shopping Centre Car Park	On	
Tre09.2			On	
Tre10.1	Tredegar Cefn Golau	Atlee Way adj Gainsborough Rd Junction	On	No Access to 4G cameras
Tre12.1	Tredegar Cefn Golau	Junction of Atlee Close & Atlee Way	On	No Access to 4G cameras
Ebw01.1	Ebbw Vale	Bethcar Steet Opposite Library	On	
Ebw01.2			On	
Ebw01.3			On	
Ebw02.1	Ebbw Vale	Intersection of Market Street and Bethcar Street	On	
Ebw02.2			On	
Ebw03.1	Ebbw Vale	Market Street	On	
Ebw05.1	Ebbw Vale	A4046 Outside Club	On	
Ebw06.1	Ebbw Vale	Bethcar Street	On	
Ebw07.1	Ebbw Vale	Bethcar Street	On	
Ebw07.2			On	
Ebw07.3			On	
Ebw09.1	Ebbw Vale	Armoury Terrace	On	No Access to 4G cameras
Abt03.1	Abertillery	Junction of Somerset Street and King Street	On	
Abt03.2			On	
Abt04.1	Abertillery	Junction of Somerset Street and King Street	On	
Abt06.1	Abertillery	High Street	On	
Abt06.2			On	
Abt07.1	Abertillery	Intersection High Street & Division Street	On	
Abt07.2	Abertillery		On	
Abt08.1	Abertillery	Church Street	On	
Abt10.1	Abertillery	Outside Trinity Chapel Division Street	On	
Abt10.2			On	
Abt10.3			On	
Abt13.1	Abertillery	New Camera Mounted to Anvil Court BGCBC Offices	On	
Abt13.2			On	
Abt14.1	Abertillery	Foundry Bridge Car Park	On	
Abt14.2		Foundry Bridge Car Park	On	
Bwm02.1	Brynmawr	Bailey Street	On	
Bwm02.2		Bailey Street	On	
Bwm04.1	Brynmawr	Junction of Market Street & Bailey Street	On	
Bwm05.1	Brynmawr	Bus Station	On	
Bwm06.1	Brynmawr	Opposite St Marys Roman Catholic Church	On	
Bwm06.2			On	
	Brynmawr	Car Park opposite bus stop	On	
Bla02.1	Blaina	High Street	On	
Bla03.1	Blaina	High Street	On	
Cwm01.1	Cwm	Junction Mill Street & Canning Street	On	
Cwm01.2			On	
Cwm01.3			On	
7.01	Llanhilleth	Railway Station	On	
7.01a			On	
7.02	Llanhilleth	Railway Station	On	
8.01	Deployable Camera	Office	On	No Access to 4G cameras
8.02	Deployable Camera	Office	On	No Access to 4G cameras
8.03	Deployable Camera	Abertillery	On	No Access to 4G cameras
8.04	Deployable Camera	Abertillery	On	No Access to 4G cameras

Appendix I: A Case Study

Community Safety Incident: In the very early hours of New Year's Day 2020, a 25-year-old man deliberately drove his Volkswagen Golf at another man outside the Blaina Constitution Club, High Street, Blaina. The victim received life-threatening injuries as a result of the collision and the offender drove off.

Camera Zone: The incident was captured on the authority's CCTV camera on Blaina High Street (Blaina Zone).

Public Support: Members of the public immediately reported the incident to Gwent Police via 999.

Police Investigation: As the Police began their investigation, they were aware of the Council's CCTV, and subsequently made a lawful request to the Council for the CCTV footage.

Council Support: The recorded evidence from the Council's CCTV system was downloaded, and provided to the Police as an evidence package, to support their investigations.

Back Story

According to press reports, it transpired that the offender had mistakenly identified the victim as being responsible for assaulting him earlier in the evening.

The footage captured by the CCTV proved invaluable to the investigation, providing crucial evidence of the attack including the collision itself and saving the Police significant investigation time. The strength of the evidence helped the Police to arrest and then charge the offender with attempted murder.

By providing high-quality footage to the Police at a very early stage, the Police and the Crown Prosecution Service were assisted in swiftly bringing the offender to justice. The CCTV footage enabled the Police to expedite the investigation which helped to reassure the victim's family and the local community.

The strength of the evidence convinced the offender to plead guilty to causing Grievous Bodily Harm with Intent, therefore a costly trial was avoided. This also prevented the victim and his family suffering the further stress associated with a Crown Court trial.

Outcome:

The offender was sentenced to six years and nine months in prison at Cardiff Crown Court.

Appendix J: Proposed Forward Work Programme 2021/22

Further Action Required	Rationale Taken from the Annual Report and the BG Code of Practice	Lead Department
Develop an Intelligence Framework to broaden the scope of the 'pressing need'	<ul style="list-style-type: none"> The current DPIAs predominant lawful 'pressing-need' and operational requirement was evidenced from published Police crime data on https://www.police.uk/. <p>Elected Member feedback included:</p> <ul style="list-style-type: none"> Concern that some council service areas are dealing with crime and anti-social behaviour, and how CCTV could be used to deal with these matters. A broad consensus that the Council should balance the evidence base for deployment of CCTV with Police crime data, Local Authority data and Community intelligence. 	Policy Team
Develop a BG CCTV Procedure Manual	Blaenau Gwent Council's CCTV Code of Practice will be supplemented by a separate Public Space CCTV Procedure Manual, which will provide guidelines on all aspects of the day-to-day operation of the PS CCTV System. To ensure the purpose and principles of the PS CCTV system are realised, the PS CCTV Procedure Manual will be based upon and expands the contents of the Code of Practice. (This will not be a public document.)	Policy Team
Develop a BG Deployable CCTV Camera Protocol	<ul style="list-style-type: none"> Elected Member feedback included: A need to understand how the Council's deployable cameras will be used and how will the Police and Council departments will be able to access these. The Council currently has a number of deployable CCTV camera units and will work with Gwent Police to develop a Deployable CCTV Camera Protocol, to aid the appropriate assessment of need and rapid deployment to address significant emerging public safety concerns. 	Policy Team
Explore further opportunities to develop elected member engagement on the journey to compliance	<ul style="list-style-type: none"> Elected Member feedback included: Members would welcome more engagement sessions on our journey to compliance. 	SIRO / Democratic Services

<p>Explore the opportunity to improve the efficiency and effectiveness of the CCTV support technology and infrastructure.</p>	<ul style="list-style-type: none"> • Broadband connectivity to main viewing centre does drop out on occasion due to issues with local router, technical services regularly monitor system and reset router when required. Technical services have engaged with SRS to investigate feasibility and costs of increasing data speeds to local hub sites. • Over and above the noted challenges, there are a number of further technical issues that affect performance of the CCTV system, most notably: <ul style="list-style-type: none"> ○ Broadband connectivity of the Council's Designated CCTV Operator accessing the network to view live feed of cameras. ○ Transient Wi-Fi and power fluctuations issues affecting reliability of CCTV units and the system. ○ Wi-Fi connection download speeds are slower compared to a hardwire broadband system which hinders the speed of downloading footage for the user. • As a result of the technical issues, some of which are ongoing, Technical Services are increasingly reliant on the maintenance contractor to manually download footage directly from cameras in order to provide footage promptly upon receipt of a lawful request. 	<p>Technical Services</p>
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