



Policy Title: CCTV within Custody Suites
CCMT Sponsor: ACC Crime & Criminal Justice
Department/Area: Criminal Justice
Section/Sector: Headquarters

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1.0 Rationale:

This policy gives information concerning the use of CCTV equipment to monitor and record activity within custody areas and cells. This policy is compliant with the Police and Criminal Evidence Act 1984 – Codes of Practice the Human Rights Act 1998 and the Regulation of Investigatory Powers Act 2000. It also takes account of draft ACPO guidance on the use of CCTV

2.0 Intention

Custody suite CCTV has been successfully used by U.K police forces since the early 1990's and has become an invaluable tool in the administration of custody suites. The use of CCTV provides important safeguards for detainees and personnel involved in the detention process whilst enhancing public confidence in this area of police activity.

It is well accepted that CCTV in police cells can be a useful tool to assist in the monitoring of vulnerable detainees and thereby reducing the likelihood of self-harm. However, the use of cameras in what might normally be regarded as an area where a detainee can expect some privacy raises issues in relation to their human rights. It is important therefore that any invasion of the right to privacy is balanced appropriately and sensitively with the need for police to effectively discharge their duty of care to persons in custody who are at increased risk of harm.

This policy document is intended to be available to the general public and all persons who may be affected by it. Paper copies of the policy document will be available at each police station equipped with a custody suite and cell CCTV system.

3.0 General Principles

The primary purpose for the installation of the CCTV systems is to assist in the management of the detention of detainees. It is recognised however that custody and cell CCTV images and sound recordings will occasionally be required for evidential purposes.

The system will help provide safeguards for police, detainees and all others involved in the detention process. This will be achieved by:

- (a) Providing a reliable record of the initial reception, booking-in and detention of the arrested person.
- (b) Recording the condition and demeanour of the prisoner.
- (c) Reducing incidents of violent or disorderly behaviour by detainees in the custody suite.
- (d) Discouraging malicious complaints and allegations.
- (e) Enhancing the security and safety of custody staff, detainees and others.
- (f) Where appropriate, the visual monitoring of detainees in cells equipped with CCTV.

4.0 Guidance, Procedures & Tactics

5.1 System Manager:

Overall responsibility for the management of the custody and cell CCTV systems will be held by the Superintendent (Criminal Justice). Additionally, BCU Commanders will appoint a member of staff to have responsibility for the management of their local custody and cell CCTV systems. The GPMS level will normally be restricted but may be raised to confidential in some circumstances (e.g. in the case of a critical incident in Custody).

5.2 System Administrators:

Recordings made in DVD format will be forwarded to the relevant BCU tape librarians (*or to other identified persons nominated on each Basic Command Unit*) who will each act as system administrators. The DVD is a write only once device. Once it has been recorded on, then it can be disposed of under the Force secure disposal contract subject to the retention requirements under **5.8.3** of this policy. In particular, they will be responsible for the following:

- (a) The reception, logging, storage and accounting of all custody media (including DVD's).
- (b) Maintaining a local database showing the movement, copying and viewing of custody and cell media together with any necessary written records.
- (c) Assisting officers in relation to the viewing and reproduction of media, forwarding copy DVD's as required and ensuring completion of Viewing Logs (forms *GEN 286*) as appropriate. However, responsibility for providing appropriate viewing facilities will lie with the local BCU Commander.
- (d) Responding to correspondence and telephone enquiries in relation to the above matters.

5.3 Custody Staff

The custody officer in charge at each suite has responsibility for ensuring that the system is functioning correctly and faults are reported immediately.

5.4 System Description:

5.4.1 Custody Suites (Custody CCTV)

Each custody suite CCTV system should monitor common areas within the custody suite and certain external locations, such as the entrance to the custody suite and exercise yard. Key locations within the custody suite may be subject to more detailed monitoring.

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5.4.2

A monitor may be placed in a secure area of the custody suite, which should be visible to persons in the custody suite. The purpose of such a monitor is to demonstrate that CCTV is in operation. Positioning should be arranged according to local needs but should not be accessible to casual oversight.

5.4.3

The signals from each Custody CCTV camera are simultaneously channelled to the recording equipment and recorded onto media.

5.4.3.1

The images produced by each camera can be viewed simultaneously or sequentially on a TV monitor located in the custody suite.

5.4.3.2

All systems are equipped with sound recording capability, which, with the exception of cells, continuously records within the monitored areas.

5.4.3.3

For reasons of privacy, the following areas are specifically excluded from both audio and video recording by the CCTV system:

- (a) Police surgeon's examination room.
- (b) Room set aside for private legal consultation or any other room used temporarily for legal consultation.
- (c) General (non-PACE) interview rooms.
- (d) Shower area.

5.5 Cells (Cell CCTV):

Cells will normally be equipped with CCTV cameras. Where the Custody Officer in charge of the Custody Suite conducts a risk assessment and decides that CCTV should be used to monitor a detainee in a cell, activity within cells will be relayed to a monitor and recorded. This shall be recorded in writing on the relevant Custody Record. The CCTV system has no audio capability within the cell areas.

5.6 Warning Notices:

5.6.1

In accordance with the Codes of Practice, warning notices in English, as well as symbols, will be displayed in prominent positions at all entrances to and inside the custody suite so that detainees are aware that CCTV is in operation. In order to ensure clarity signs should also be placed inside equipped cells. It must also be made clear that audion recording is taking place in relevant areas.

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5.6.2

Custody officers must ensure that non-English speaking or a visually impaired detainee are made aware that activity and audio is being monitored and recorded.

5.6.3

Clear labels will indicate that BCU custody suites are equipped with cell CCTV and that CCTV monitoring is in operation.

5.7 Police & Criminal Evidence Act 1984 Codes of Practice:

Custody officers must comply with the relevant parts of the Codes of Practice concerning the use of CCTV in custody areas. In particular:

- (a) Any request by a detained person, or any other person, to have the cameras switched off will be refused.
- (b) Audio or video recording made in the custody area is not part of the custody record and therefore the routine inspection of such recordings by detainees, appropriate adults or legal representatives is not permitted.
- (c) The custody officer will ensure that anyone who may not be able to read or understand is warned verbally of the existence of recording facilities.
- (d) Care must be taken when consideration is being given to using images produced by a custody CCTV system. Such images should not be used to circumvent identification procedures as set out in code D of the Police & Criminal Evidence Act 1984 Codes of Practice.

5.8 Operation of Custody CCTV:

5.8.1

The CCTV system comprises a digital recording system which will be sited securely within a purpose-built environment within the custody suite area. The custody officer remains in overall responsibility at all times for the security of the system and for ensuring that a Maintenance Log is kept up to date

5.8.2

At the beginning of each tour of duty the custody officer in charge of the custody suite will ensure that the system is fully operable and working correctly. If the system is in any way defective the custody officer must ensure that action is taken to inform the appropriate contractor in order to have the fault remedied without delay. A Maintenance Record will be kept to record the correct operation of the CCTV system each day and also to detail any maintenance work carried out.

5.8.3

The normal retention period for such media will be 30 days after which the media will be over-written and irrecoverable.

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5.8.4

There may be occasions when the product from the digital system may be required to be kept for a period in excess of 30 days in order that potential evidence can be preserved:

- (a) Where the product is identified as containing evidence;
- (b) Where a complaint is made against police or a contractor (for example, in relation to a Custody Assistant operating within a force Custody Suite);
- (c) Where there is an occurrence, which, in the opinion of the custody officer, may result in a complaint or civil action;
- (d) Where the duty inspector, senior investigating officer, an investigating officer from the force Professional Standards Department, or an investigator from the Independent Police Complaints Authority (IPCC) directs retention.

5.8.5

Where it is identified, at the outset that extended retention of the product will be required then the Inspector responsible for the custody suite at the time will liaise with the custody officer in charge of the custody suite to ensure that a copy of the product of the relevant camera or cameras will be made onto DVD media in both Master and Copy DVD formats prior to the end of his or her tour of duty. The Master recording will be placed into a Video Tape Evidence Bag. It will be sealed and entered into Crime Property either by the custody officer in charge of the custody suite or by a designated detention officer. The Master recording will subsequently be forwarded by the relevant BCU Property Officer to the tape librarian (or other person nominated by each Basic Command Unit as at 5.2 who will then be responsible for ensuring that it remains securely stored and for recording any subsequent movements of the Master recording. Local circumstances may mean that the detail of this process might vary somewhat across BCU's depending on the staffing arrangements and structure of each BCU. However, it remains the responsibility of the BCU Custody Inspector to ensure that the Master Copy is securely stored, that continuity of evidence is preserved at all times, and that the preservation and storage process is sound and robust.

5.8.6

Each tape librarian (or nominated person as at 5.2 will communicate with the local Property Officer on at least a weekly basis in order to ascertain that any Master DVD's are being forwarded to them in a timely and effective way.

5.8.7

Recordings that contain evidential material will be retained in accordance with the force destruction policy. Where a recording has a potential bearing on civil litigation or involves a complaint against police, the force solicitor or, as the case may be, Professional Standards Department must be consulted to determine the retention period.

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5.9 Operation of Cell CCTV:

5.9.1

The use of cell CCTV to monitor a detainee will not remove the requirement for personal visits in accordance with code C of the Codes of Practice and will be subject to dynamic risk assessments by the custody officer.

5.9.2

Where an arrested person is considered to be suicidal or vulnerable to self-harm, or there is a suicidal or self-harm marker on PNC which the Custody Officer in charge considers is still relevant, then the arrested person should be seen by a police surgeon, health care professional or community psychiatric nurse at the earliest opportunity. This requires constant observation by physical cell watch which means having an officer specifically and solely allocated to the task in accordance with PACE until medical advice has been received.

5.9.3

The following circumstances are intended to provide guidance to custody officers and indicate the main purposes of cell CCTV monitoring. The guide should not be interpreted as being exhaustive. Custody officers are encouraged to use initiative and utilise cell CCTV whenever it is believed that it is appropriate, will assist in the process of monitoring detainees and can be justified:

- (a) Where the question of fitness for detention is to be ascertained (i.e. pending the arrival of a police surgeon or other health care professional).
- (b) Where a medical practitioner advises that a detainee is in need of enhanced observation.
- (c) Where a detainee has been subject to the use of incapacitant spray and recovery is protracted.
- (d) Where the PNC indicates warning signals for deliberate self-harm and suicide; (note the requirement for constant observation, this means having an officer specifically and solely allocated to the task in accordance with PACE until medical advice has been received).
- (e) Where a detainee has been detained under any of the provisions of the Mental Health Act 1983 or related legislation.
- (f) Where the circumstances of the arrest, investigation or charge indicate the possibility of an increased risk of harm or vulnerability.

5.9.4

It should be noted that the very use of cell CCTV suggests that an increased risk of vulnerability or harm is present. It therefore follows that custody officers must initiate a regime of periodic visits that are commensurate with that risk. This will usually be decided upon following consultation with a medical practitioner.

5.9.5

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Custody officers must be alert to the fact that there may be occasions where the risk of self-harm, suicide or other exceptional vulnerability is of such degree that the most appropriate means of monitoring a detainee is by constant observation by means of physical cell watch. This means having an officer specifically and solely allocated to the task in accordance with PACE.

5.9.6

In cases of enhanced monitoring where the dynamic risk assessment suggests that the level of monitoring falls short of a full physical cell watch, then it may be appropriate to use a combination of CCTV monitoring and physical cell checks. Where it is decided to use the cell CCTV system to monitor a detainee, the custody officer must:

- (a) Inform the detainee of the decision and the reason for it.
- (b) Identify an officer or custody officer assistant who is specifically tasked with monitoring the detainee.
- (c) Ensure an appropriate cell visiting policy is initiated.
- (d) Initiate the use of other appropriate safety measures (e.g. removal of property/clothing).
- (e) Record the action in the custody record.

5.9.7

Although the cell CCTV system is designed to provide overt surveillance of the cell, no indication of the location or capabilities of the equipment should be divulged.

5.9.8

If the detainee who is being monitored conducts, or is likely to conduct, him/her/self in such a manner that considerations of decency should be taken, and it is operationally possible, then a monitoring officer of the same sex as the detainee should be utilised.

5.9.9

The need to use cell CCTV monitoring will be continually assessed throughout the period of detention. In particular, at times of review, reviewing officers will consider whether monitoring is necessary. If a detainee who was initially thought not to be at risk is subsequently judged to be so, cell CCTV monitoring may be initiated. Any change in the use of cell CCTV must be subject of an entry in the custody record and the detainee made aware. A combination of enhanced monitoring by CCTV and by cell visits should be considered as part of the dynamic risk assessment process.

5.9.10

The custody officer must ensure that monitoring of images from cell CCTV is only undertaken by members of staff who have responsibility for the welfare of detainees.

5.10 Searches of Detainees:

5.10.1

The custody officer will ensure that cells equipped with CCTV should not be used to conduct a 'strip search' whilst monitoring is in operation. The Codes of Practice indicate that, in essence, such searches must be conducted in private. It is unlikely that a monitored cell would be considered a private place for these purposes.

5.10.2

The Custody Officer may authorize a search under section 54 of the Police and Criminal Evidence Act 1984 (a 'strip search') - for example, to ascertain whether a prisoner has with him anything which he could use to cause physical injury to himself or any other person, to damage property, to interfere with evidence or to assist him to escape. Any search must be carried out in accordance with the Codes of Practice and the Police and Criminal Evidence Act 1984. If the behaviour of the prisoner leads the Custody Officer to believe that force may be required in order to conduct such a search then consideration should be given to the use of cell CCTV to record the process.

5.10.3

If CCTV is in operation in any room utilised for such searches, then the Custody Officer in charge, whenever practicable, should explain to the detainee that CCTV also operates within that room but that the detainee will not be specifically remotely monitored during the search provided he co-operates with the search. Where the detainee is compliant, then officers conducting such a search should, whenever practicable, place themselves between the CCTV camera and the detainee whilst conducting the search in order to reassure the detainee that any invasion of privacy will be minimal but consistent with an effective and lawful search.

5.10.4

Where reasonable force has to be used in order to carry out the search due to the detainee being obstructive or non-compliant, then the search procedure should be captured as fully as possible by the CCTV camera system for the protection of the detainee and to show as clearly as possible the level of force utilised in order to carry out the search. In these circumstances, care should be taken to ensure that the monitoring of non-compliant detainees being searched is conducted by one custody assistant or officer only, that the viewing monitor is only viewable by that dedicated individual, and that wherever possible the individual monitoring the search is of the same sex as the detainee.

5.10.5

A full entry will be made in the detainee's Custody Record in order to reflect the circumstances in which such searches have been conducted and any monitoring carried out utilising the CCTV camera system.

5.11 Management of Cell CCTV:

5.11.1

All monitoring of detained persons by CCTV will be recorded. Routine viewing of recorded cell CCTV material will not be permitted. Any viewing of such material must be recorded in writing on a Viewing Log (form GEN 286).

5.11.2

The tape librarian (or other person nominated as at 5.2) will be responsible for managing, handling and securely storing cell CCTV media (with the exception of the initial period during which a Master DVD has been entered into Crime Property as specified in paragraph 5.8.5 of this policy). The normal retention period for media will be in accordance with paragraph 5.8.3 of this policy.

5.12 Product Required For Evidential Purposes – ‘Critical Incidents’:

5.12.1

A custody and/or cell CCTV recording may contain evidence of an incident which is either an actual or potential ‘Critical Incident’ as defined within force policy. In such cases, it is essential that potential CCTV evidence is safeguarded.

5.12.2

In the event of an actual or potential Critical Incident (for example, a death in police custody) authority must be sought from a member of the BCU Senior Management Team, Senior Investigating Officer or duty ACPO officer for a copy of the product from a relevant camera or cameras to be made. Once authority is given, then the procedures specified in paragraph 5.8.5 will be followed. Where a large amount of data is likely to be required, then consideration should be given to contacting the force Technical Services Unit (Audio Visual Section) for assistance.

5.12.3

Once the product has been copied, then it will be securely stored and tracked in accordance with paragraph 5.8.6.

5.12.4

The recorded media will be stored, treated and handled in accordance with force crime property policy. Any arrangement for the copying or viewing of the media is the responsibility of the senior investigating officer and/or Professional Standards Department but viewings must be recorded on a Viewing Log (form GEN 286).

5.13 Disclosure:

5.13.1

The use of CCTV in the police custody areas and certain cells is primarily to assist in the monitoring of persons whilst in custody. It is not intended as an evidence-gathering tool. However, CCTV recordings may potentially contain material that assists the defence or undermines a prosecution case.

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Investigating officers must consider the provisions of the Criminal Procedure and Investigation Act 1996 and related Codes of Practice. They must make an assessment as to whether a CCTV recording will fall within the provisions of this legislation. If it is decided that it does, then the provisions of the Act regarding disclosure and retention will be applied as it would to any other material and it should be listed as 'unused material' by the investigating officer.

5.13.2

Defence solicitors will be given the opportunity to request retention of the relevant recorded product provided they notify the force that the recording contains specified and identified material that is likely to assist the defence case. Such requests should be supported by the Defence Statement which will normally be submitted to the Crown Prosecution Service. Defence representatives will only be allowed to view the relevant section of the recording that relates to the person whom they represent. Speculative viewing will not be permitted. Recorded product which identifies other detainees within Custody Suites will not be provided.

5.13.3

Defence requests must be made in writing to the custody station concerned within twenty eight days of the incident concerned and requests must include a copy of the Defence Statement. The tape librarian (*or other person nominated as at 5.2*) will be responsible for dealing with requests for recordings and the provision of copy DVD's.

5.13.4

If a recording is retained as a result of a defence request, the officer in charge of the case must ensure that the Crown Prosecution Service is informed if this has not already been done. This will usually be by submission of form MG20. An administration charge of £215.00 will be made in respect of each set of 3 DVD's requested or pro rata where less than 3 are produced.

5.13.5

The viewing of recordings by the defence and the provision of media copies will be conducted in accordance with force policy and any relevant local BCU protocols.

5.14 Custody Visitors and Associated Matters:

5.14.1

The Home Office 'Revised Guidance on Lay/Custody Visiting' published in November 2000 states:

'The introduction of CCTV into custody suites has raised the question of whether custody visitors should have access to footage. This is ultimately a matter for local discretion, but the Home Office view is that custody visitors should carry out their functions in person and not by viewing either live CCTV pictures or recorded footage. Their role is fundamentally interactive with both detainees and police staff and cannot be discharged remotely. There may

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also be issues about infringing the privacy of detainees who have not consented to visitors observing them using CCTV. However, where specific incidents or circumstances arise as issues and have been captured on CCTV, visitors might reasonably be allowed where both police and the detainee(s) concerned consent'.

5.14.2

Accordingly the viewing of custody suite recordings by Custody Visitors or other non-police individuals should be restrictive. A BCU commander may authorise the showing of custody suite CCTV recordings to a community representative (Local Councillor, Doctor, Member of Parliament, Solicitor, Police Community Consultative Group, Custody Visitor etc) if the following circumstances exist:

- A death or other critical incident has occurred involving a person in custody on their BCU and
- As a result of the death or incident, serious public disorder is likely and
- Showing the video is likely to prevent this public disorder from occurring and
- The interests of public safety in preventing disorder outweigh the possible privacy issues caused by showing the video.

5.14.3

Where BCU commanders wish to show custody suite CCTV recordings to community representatives in other circumstances authority should be sought from an officer of ACPO rank.

5.14.4

Where custody suite video recordings are viewed in these circumstances a written record must be kept by the BCU commander or designated officer in a Viewing Log (form GEN 286) detailing:

- (a) Location of custody suite.
- (b) Date and time that the recording covers.
- (c) Date and time the recording was viewed.
- (d) Person(s) present at the viewing.
- (e) Reason for viewing.
- (f) Authorising officer.

5.14.5

Although custody visitors may not routinely examine custody suite CCTV recordings, the Home Office policy states that part of the duties of lay custody visitors includes checking that custody CCTV systems are functioning during visits to custody suites. Custody visitors should, therefore, be given the opportunity to ensure that the CCTV system is working correctly. Defects must be reported immediately.

5.15 Administration

Viewing logs (form GEN 286) are available electronically under General Templates on the force Local Area Network. Video Tape Evidence Bags are available to order as part of current stationery stocks within the force. Pre-printed DVD's are available to order from a force-approved supplier nominated through H.Q. (Criminal Justice). Appropriate CCTV signage, and replacement signage, is available from the relevant contractor responsible for installation and maintenance of the CCTV system.

Used Viewing Logs will be retained and stored for a period of 8 years.

5.0 Challenges & Representations

Any enquiries in relation to this order should be referred to:
Thames Valley Police Headquarters,
Criminal Justice Department,
Wychwood House,
26, High Street,
Kidlington OX5 2DH

6.0 Communication

6.1 Links to Police National Legal Database Other

Custody SOP

6.2 Implementation Strategy

The Policy Management unit will publish the policy onto the policy and procedures intranet site and the TVP website, it will also be advertised in Manager's Briefing.

The policy will be circulated to BCU Commanders, BCU Custody Inspectors (for dissemination to custody officers), the Crown Prosecution Service, Criminal Defence Service and to Reliance Security plc as existing custody contractors. The policy will be explained at Custody Management Meetings and locally on an ad hoc basis as requested. Criminal Justice staff will monitor the roll-out process of CCTV across custody suites and will personally visit suites from time to time in order to monitor its effectiveness as part of the review process.

7.0 Compliance and Certification

This policy is compliant with the Police and Criminal Evidence Act 1984 – Codes of Practice the Human Rights Act 1998 and the Regulation of Investigatory Powers Act 2000. It also takes account of draft ACPO guidance on the use of CCTV

(i) Human Rights Articles Engaged

- a. Articles 8 – Privacy and Related Matters
- b. Article 2 - Right to Life
- c. Article 6 - Right to a Fair Trial
- d. Article 14 – Prohibition of Discrimination

(ii) Prohibition of Discrimination

By engaging any of the aforementioned Articles, there is the potential to engage Article 14 of the Convention. The enjoyment of the Rights and Freedoms set forth in the European Convention of Human Rights shall be secured without discrimination on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status. Actions taken as a consequence of this policy will be applied fairly and impartially, having due regard to natural justice and human rights.

7.2 Diversity Impact Assessment

This policy has been assessed for its relevance to the six strands of Diversity and has been rated as “LOW”.

7.3 Diversity (Human Resources)

In the application of this policy, the Force will not discriminate against any persons regardless of their gender, sexual orientation, race or ethnic origin, religion, age or disability.

7.4 Management of Police Information (MoPI) Compliance

Information deemed ‘for a policing purpose’, or any data about an individual that is circulated or received by e-mail; or published/downloaded via the intranet or internet or circulated in any other format must comply with MoPI guidelines.

7.5 Community Engagement Strategy and Standards

This policy has the potential to engage the Force Community Engagement Standards.

Please use the following links for further information:
Community Engagement Strategy
Standards

7.6 Data Protection

All personal data processed in compliance with this policy will be managed in accordance with the provisions of the Data Protection Act 1998. Appropriate signage will be in place.

7.7 Freedom of Information Act

This policy is suitable to be made available to the public and can be published on the TVP FOI internet website.

7.8 Protective Markings

This policy has been assessed as NOT PROTECTIVELY MARKED. GPMS guidelines will be followed to ensure the correct storage, movement and destruction of protectively marked material gathered as a result of this policy.

7.9 Health & Safety at Work

The necessary Health & Safety considerations have been included within the Guidance, Procedures and Tactics section.

8.0 Monitoring and Review

Monitoring of this policy is to be carried out by BCU Custody Inspectors with a local audit at least every 2 months.

This policy is to be reviewed annually by HQ CJ to ensure that it is being effectively applied, and will look at:

- Changes in legislation
- Court rulings – Domestic, European and Human Rights
- Examples of good practice from other Forces or other organisations
- Changes in Home Office Circulars
- Developments with ACPO Policy Unit
- Representations made by individuals and relevant organisations
- Relevant equality data