



Regularity audit of CCTV policy

Date of meeting 6 September 2024

Date of report 1 August 2024

Report by Chief Executive

1. Object of report

To advise the committee on the findings of a regularity audit of closed-circuit television (CCTV) policy. This engagement is included in the annual Internal Audit plan for 2024/2025.

2. Background to report

The steady growth of the use of CCTV systems across public and private sectors has led to both fixed and mobile cameras becoming more accepted in society. As CCTV becomes more mainstream and affordable, it is now more common to see technologies such as smart doorbells and wireless cameras. Traditional CCTV also continues to evolve into more complex artificial intelligence (AI) based systems. These can process more sensitive categories of personal data.

The use of CCTV is set out in legal requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

SPT undertakes to process personal data lawfully and fairly in accordance with data protection legislation. These arrangements are set out in a CCTV guidance document.

The objective of this engagement was to review and evaluate the current policy, procedures, and monitoring arrangements for the operation of CCTV.

This engagement tested elements of the internal controls and mitigation against SPT 6: Security, as identified in the Corporate Risk register.

3. Outline of proposals

CCTV is operated throughout SPT locations for the following purposes:

- the prevention, detection, and investigation of crime;
- public safety and security;
- the management and monitoring of health, safety, and security;
- investigate and respond to reports of poor customer service, loss, injury, or damage.

CCTV is operated and monitored by licenced and trained individuals in accordance with legal requirements and guidance. Access to view CCTV is limited to authorised users.

Engagement testing found that current policy and procedures require to be refreshed and updated to cover recent organisation change and use of new operational equipment.

Engagement testing also identified a requirement to review and where appropriate, enhance access and security arrangements.

There are areas for improvement which are addressed by recommendations which can be found at Appendix 1. Transport Operations management and Legal services have agreed to implement the recommendations, which is currently being actioned.

Key controls exist and are applied consistently and effectively in the majority of areas tested in this engagement. Reasonable assurance can be taken from this engagement.

4. Committee action

The Committee is asked to note the contents of this report and agree that the Audit and Assurance Manager submits a follow-up report on the implementation of the recommendations to a future meeting.

5. Consequences

Policy consequences	<i>None.</i>
Legal consequences	<i>None.</i>
Financial consequences	<i>None.</i>
Personnel consequences	<i>None.</i>
Equalities consequences	<i>None.</i>
Risk consequences	<i>As detailed in the report.</i>
Climate Change, Adaptation & Carbon consequences	<i>None.</i>

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Title **Director of Finance & Corporate Support**

Name Valerie Davidson
Title **Chief Executive**

For further information, please contact Iain McNicol, Audit and Assurance manager on 0141 333 3195.

**Reasonable
assurance**

APPENDIX 1 Audit & Standards committee – 6 September 2024

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The recommendations from this engagement are listed in the following table. The priorities are defined as follows:

- High:** A fundamental control that should be addressed as soon as possible;
- Medium:** An important control that should be addressed within three months;
- Low:** An issue which is not fundamental but should be addressed within six months to improve the overall control environment.

No.	Recommendation	Priority	Action Proposed	Lead Officer	Due date
1	<u>Policy and procedures</u> CCTV policy and related procedures should be refreshed, reviewed, and updated to reflect the following matters: <ul style="list-style-type: none">• Legislation changes;• Scope of CCTV and other surveillance systems;• Organisational change, responsibilities, designations;• Change in technology used i.e. cloud-based systems, drone, SPT fleet vehicle cameras,	Medium	CCTV policy and related procedures will be refreshed, reviewed, and updated.	Information Governance Officer	September 2024

No.	Recommendation	Priority	Action Proposed	Lead Officer	Due date
	<p>Automatic Number Plate Recognition (ANPR), new rolling stock use of telephone and tablet cameras;</p> <ul style="list-style-type: none"> Retention schedules; Retrieval arrangements (i.e. new rolling stock, cloud-based systems security, access & retrieval arrangements and sharing by links.) 				
2	<p><u>CCTV Risk assessment, Data Impact Screening / Assessment and Privacy notices</u></p> <p>The Information Governance Officer should review and update the following:</p> <ul style="list-style-type: none"> Requirements for risk assessment of CCTV systems; Data Protection Impact Screening / Assessment for recent changes in use of CCTV, ANPR, Drone, fleet vehicle cameras, new subway rolling stock, and implications of cloud storage; Contractor arrangements; Privacy notices, and equalities impact assessment requirement. 	Medium	Current arrangements will be reviewed and updated, where appropriate.	Information Governance Officer	September 2024
3	<p><u>Record of processing activities</u></p> <p>The Information Governance Officer should ensure that the record of CCTV processing activities is maintained and is up to date.</p> <p>Note: The record of processing activities serves as a management tool for data protection by providing an overview of the processing. When the processing of personal data is mapped to this record, it aids in complying with other requirements of the GDPR, such as implementing appropriate technical and organisational measures to ensure a level of security appropriate to the risk.</p>	Medium	A record of CCTV processing activities will be maintained in line with the Information Commissioner's Office (ICO) requirements.	Information Governance Officer	September 2024

No.	Recommendation	Priority	Action Proposed	Lead Officer	Due date
4	<p><u>Logical access controls</u></p> <p>Transport Operations management should explore the possibility of introducing individualised logical access to the CCTV systems.</p>	Medium	<p>Subway CCTV access controls will be reviewed, with a view to adopting individual logins.</p> <p>Head of Service Operations & Security (Bus Stations) advised that individual CCTV log-ons and passwords are not possible for bus stations.</p> <p>Compensatory controls are in place.</p>	<p>Head of Service Operations & Security (Subway) / Head of Service Operations & Security (Bus Stations)</p>	September 2024
5	<p><u>External transfer of CCTV images to third parties</u></p> <p>The Information Governance officer in conjunction with Digital and Transport Operations management should consider the current technologies being used to share CCTV images with a view to minimising the requirement to copy images to shared drives and use of CDs and or USB sticks.</p> <p>There should be a clear audit trail of any images shared. Arrangements for the following should also be defined:</p> <ul style="list-style-type: none"> • Copying to discs/USB/share drives; • Requirements for encryption, password protection, • Arrangements for reconciliation and destruction of discs. 	Medium	A review of data transfer arrangements will be conducted.	Information Governance Officer	September 2024

No.	Recommendation	Priority	Action Proposed	Lead Officer	Due date
6	<p><u>CCTV asset database</u></p> <p>Transport Operations management should consider maintaining a central database of CCTV and related surveillance assets across all services.</p>	Low	Consideration will be given to maintaining a central database of CCTV surveillance assets.	Head of Service Operations & Security (Subway)	November 2024
7	<p><u>CCTV signage</u></p> <p>Transport Operations management should review CCTV signage in accordance with ICO requirements including signage on new rolling stock and the entry to Subway car parks.</p>	Medium	CCTV signage will be reviewed to ensure compliance with ICO requirements.	Head of Service Operations & Security (Subway) / Head of Service Operations & Security (Bus stations)	September 2024
8	<p><u>Training</u></p> <p>Learning and Development should provide feedback to senior management on staff failing to complete eLearning modules.</p> <p>Heads and Managers should remind all staff to complete eLearning modules pertinent to their jobs.</p> <p>SPT staffing wearing Body Worn Cameras should be reminded to advise members of the public when Body Worn Cameras are being activated.</p>	Medium	Staff will be reminded to complete all relevant training modules.	Head of Service Operations & Security (Subway) / Head of Service Operations & Security (Bus stations)	September 2024