



Newbridge Weight Restriction Enforcement ANPR Camera System

Statement of Compliance with the Home Office Surveillance Camera Code of Practice

Version 1: Issued (date TBC)

1. Background

The Secretary of State has issued a Surveillance Camera Code of Practice (“the Code”) under Section 30 of the Protection of Freedoms Act 2012. The Code provides guidance on the appropriate and effective use of surveillance camera systems by relevant authorities which includes Local Authorities.

Oxfordshire County Council has installed Automatic Number Plate Recognition cameras at Newbridge, A415, Oxfordshire. This statement addresses the requirements of the Code in relation to this system.

2. Purpose, Aim and Need

Newbridge is a 13th-century bridge carrying the A415 road over the River Thames. It is one of the two oldest surviving bridges across the Thames and is a listed structure. The bridge is also a weak structure and to protect it an 18t maximum gross weight limit for vehicles is in place on the bridge. The purpose of the weight restriction is to protect the bridge from damage resulting from use by heavy goods vehicles and thus protect the road infrastructure in the County from the disruption which would result from a need to further restrict, or close, the bridge. Contravention of this weight limit is an offence under the Oxfordshire County Council (A415 Kingston Bagpuize and Northmoor) (Weight Restriction) Order 2007 and Section 5(1) of the Road Traffic Regulation Act 1984. Drivers are alerted to the weight restriction on the road through extensive signage in and around the area which includes advance notices on roads which intersect with the A415.

The weight restriction is enforced primarily by Oxfordshire County Council’s Trading Standards Service. Prior to August 2017 monitoring of traffic using the bridge was through visual observation of traffic on the road, either by members of the local community or Trading Standards staff. However, since the bridge is in a rural location with very few houses in the surrounding area the amount of community monitoring is limited. During the period from April 2016 to March 2017, 9 monitoring visits were undertaken at the location by Trading Standards staff, each of approximately 1-2 hours duration, and 17 breaches of the weight restriction were identified during these visits. In addition there were 16 breaches reported to Trading Standards by members of the public.

The Automatic Number Plate Recognition cameras provide for 24/7 monitoring of the traffic using Newbridge. The purpose of the cameras is to capture images of any vehicle that uses the bridge in contravention of the weight restriction. This will enable the circumstances of the potential contravention of the traffic regulation to be investigated and legal action to be instigated if appropriate. The overarching aim is to deter drivers of vehicles which exceed the weight limit from using the bridge. To achieve this, along with signage and warnings for drivers, it is necessary to have the capability to identify drivers of vehicles that contravene the restriction and for drivers to be aware that any use of the bridge in contravention of the restriction will be recorded and legal action could follow.

The cameras will remain in place and operative until such time as contraventions of the weight restriction are sufficiently infrequent for the continual monitoring of the bridge to be unnecessary for its protection.

3. Privacy

A Privacy Impact Assessment has been completed. This assessment identifies that the cameras will gather information about individuals. Primarily this information will be gathered through the recording of images of vehicles which will then be further processed resulting in information being obtained from other sources about the driver of the vehicle and purpose of journeys. Images of vehicles suspected of contravening the weight restriction will be stored which will clearly show the vehicle but not the registration number. The registration number is separately photographed. Images of other vehicles crossing the bridge at the same time will, inevitably, be captured as part of images of the vehicle under investigation but no additional registration numbers will be photographed. Therefore, this intrusion is necessary for the enforcement of the restriction and the level of intrusion has been minimised as far as possible in the design of the system.

In addition, images may be captured of pedestrians on or near the bridge. This will be of minimal intrusion. It is unlikely that there will be pedestrians crossing the bridge as it is not a bridge which is heavily used by pedestrians. The cameras will be visible and the presence of cameras is advertised through extensive signage on roads leading to the bridge. The occupiers of buildings adjacent to the bridge will be informed of the presence of the cameras and their method of operation.

The privacy impact will be minimised through limiting the image capture to the road and immediate surrounding area (i.e. public places) and not including any audio capture.

4. Transparency

Information about the use of the camera system will be published on the County Council's website along with a contact point for further enquiries. Details of how to make a complaint about actions and decisions of the Council are also available on the Council's website. The column holding the cameras will display a sign advising people of who to contact for information about the cameras.

This policy will be published on the County Council's website to provide information about the rationale for use of cameras and their operation.

5. Accountability

The individual with overall responsibility for the development and operation of the camera system and for ensuring there is appropriate transparency over its purpose and deployment and for reviewing how effectively it meets its purpose is the Head of Community Protection Services.

6. Policies and Procedures

Information gathered by the camera system will only be accessible to Trading Standards staff and Council legal advisors and only to the extent necessary for the Council to enforce the weight restriction. Access to the data and images and the arrangements for secure storage of the information will be governed by a Service work instruction which will be communicated to all staff who have access to the information.

7. Data Retention

The camera system records images of all vehicles travelling through Newbridge on the A415. The system uses a real-time interface to an extracted DVLA database provider where vehicle information is checked and vehicles which exceed the maximum gross weight limit on the bridge are identified. Images of vehicles which exceed the maximum gross weight are held by the system provider temporarily until downloaded to Trading Standards. Images of vehicles which do not exceed the weight limit are automatically deleted by the system.

Trading Standards will retain the data in accordance with existing procedures for retention and use of material gathered in the course of investigations.

8. Data Disclosure

Data obtained by the system will only be used for the purpose of investigations into suspected contraventions of the weight restriction. Staff will only access the data as necessary for this purpose. Information will only be disclosed to other parties when necessary in order to investigate and prosecute contraventions of the weight restriction. Information gathered by the system will not be disclosed for other purposes unless permitted under the Data Protection Act 1998 or as permitted under other legislation such as the Counter Terrorism Act 2008.

Any request from third parties for information obtained by the camera will be considered by the Trading Standards Operations Manager in consultation with the Council's Legal Services.

Aggregated non-personal data will be published to show the outputs of the cameras (e.g. total numbers of suspected contraventions identified by the camera system in a period).

9. Standards

At the time of installation there are no standards applying to the use of ANPR camera systems for monitoring weight restricted roads.

10. Data Security

Data recorded by the cameras will be held temporarily on the system supplier's servers until downloaded to Trading Standards. The data concerned at this stage is images of vehicles with a maximum gross weight in excess of the weight limit as they travel across the bridge and associated data files showing the date and time the recordings were made.

Once downloaded by Trading Standards this data will be held within the County Council's network which is only accessible by County Council staff. The data will be held in an area of the Council's network that only Trading Standards staff can access. Once saved on the Council's system, the data is subject to the Council's information governance policies and procedures.

11. Review and Audit

This policy will be reviewed annually. The review will take account of use of the system and the outcomes achieved as a result and will consider the necessity of the camera system remaining in use and its effectiveness in achieving the purpose for which it was installed.

The annual review will also take into account any change in policy, standards or legal procedures which bring into question the ability of the cameras to produce evidence that can be relied on in court proceedings and whether the filtering of the data against the DVLA database produces data that is fit for purpose.

Date:

Approved by: