

CLOSED CIRCUIT TELEVISION POLICY

August 2024

Contents

Page 2	Introduction
Page 2	Purpose and Scope
Page 3	Objectives
Page 4	Principles
Page 4	CCTV Codes of Practice
Page 6	Location, Monitoring and Footage requests
Page 9	Deployment Procedure
Page 11	Data Protection and Retention
Page 14	Management and Review
Page 15	Glossary
Appendix A	Confidentiality Agreement
Appendix B	Three Rivers Community Safety Partnership Information Sharing Agreement

Certificate of Agreement

The content of this Policy is hereby approved by Three rivers District Council, the Three Rivers Community Safety Board, and the Three Rivers Community Safety Coordinating Group in respect of Three Rivers District Council Closed Circuit Television Systems. Compiled by Three Rivers District Council Community Safety Team in consultation with the above groups and Three Rivers Neighbourhood Policing Teams.

Signed for on behalf of Three Rivers District Council

NAME: Kimberly Grout

POSITION HELD: Associate Director of Corporate, Customer & Community

DATED: August 2024

Signed for on behalf of Three Rivers District Council

NAME: Andrew Scarth

POSITION HELD: Lead Member for Community Safety and Partnerships

DATED: August 2024

Signed for on behalf of Three Rivers District Council

NAME: Andrew Palfreyman

POSITION HELD: Chief Inspector – Three Rivers

DATED: August 2024

This policy can be found on the Three Rivers Council Website at:

[Community safety in Three Rivers District | Three Rivers District Council](#)

Introduction

- 1.1 Three Rivers District Council operates two Closed Circuit Television (CCTV) systems:
 - 1.1.1. CCTV cameras that are wholly owned, monitored, maintained, and operated by Three Rivers District Council (hereafter called **TRDC CCTV System**). The TRDC CCTV systems operate in Three Rivers House, Batchworth Depot (including refuse vehicle cameras), The Aquadrome and in our Temporary Accommodation in South Oxhey and Rickmansworth. These cameras are managed and maintained by Three Rivers District Council Property Services except for the cameras at the Temporary Accommodation which is maintained and managed by Watford Community Housing (WCH), on behalf of the Council.
 - 1.1.2. CCTV cameras that are owned and managed by Three Rivers Community Safety Partnership (hereafter called the **TRCSP CCTV System**) but monitored and maintained under contract to Hertfordshire CCTV (hereafter called HCCTV).
- 1.2. The TRCSP camera system operates in locations throughout the district and is managed by the Three Rivers Community Safety team on behalf of the Community Safety Partnership.
- 1.3. Both CCTV Systems comprise of multiple cameras that are fully operational with pan, tilt and zoom facilities, whilst others are fixed cameras with motion triggered on-site recording.
- 1.4. For the purposes of this document, in relation to Data Protection and UK General Data Protection Regulations (GDPR), the 'owner' and the 'data controller' of all CCTV Systems is Three Rivers District Council.

2. Purpose and Scope

- 2.1. The purpose of this policy is to state the intention of Three Rivers District Council and the Three Rivers Community Safety Partnership, to manage, use and operate CCTV and to support the objectives of all CCTV Systems. This policy does not include the use of body worn cameras, the purpose and scope for the use of these can be found in Three Rivers District Council Lone Worker Policy nor does it include the CCTV system operating at Watersmeet, although the scope and purpose of this system can be found in the separate Watersmeet CCTV policy document, the policy will adhere to the requirements of the Codes of Practice laid out within this policy.
- 2.2. Three Rivers District Council and the Three Rivers Community Safety Partnership use CCTV for the following purposes:
 - To provide a safe and secure environment for residents, staff, and visitors
 - To prevent loss of or damage to public spaces, buildings, and/or assets
 - To assist in the detection, prevention and prosecution of Crime
 - To help reduce the fear of Crime.

In relation to refuse vehicle camera fitment, the primary purposes are –

- Safety: Cameras offer a panoramic view, ensuring no corner goes unseen
- Operational Efficiency: Cameras help streamline operations. Reversing in congested areas, navigating through tight spots, or ensuring accurate collections, truck cameras make the job significantly easier
- Legal Protection: Incidents on the road can sometimes lead to legal complications. Having recorded footage from truck cameras can provide an unbiased account, potentially safeguarding drivers and businesses from false claims

2.3. Compliance with this policy and with the arrangements that sit under it ensure that Three Rivers District Council use of CCTV is proportionate in response to identified problems and operates with due regard to the privacy of individuals.

2.4. The Council and the Three Rivers Community Safety Partnership recognises that it is their responsibility to ensure that the scheme should always comply with all relevant legislation to ensure its legality and legitimacy in a democratic society.

2.5. The policy provides guidance on the appropriate use of the CCTV systems and the legislation it complies with, including:

- The Human Rights Act 1998 Article 8
- Data Protection Act 2018
- UK General Data Protection Regulations (“GDPR”)
- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- Surveillance Camera Code of Practice 2021
- Criminal Procedure and Investigations Act 1996

2.6. The TRDC CCTV System and the TRCSP CCTV System shall be operated with respect for all individuals, recognising the individual right to be free from inhuman or degrading treatment and avoiding any form of discrimination based on Age, Disability, Gender Reassignment, Marriage or Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex or Sexual Orientation.

3. Objectives

3.1. The objectives of the CCTV Systems within this policy, which form the lawful basis for the processing of data, are:

- To help reduce the fear of crime and antisocial behaviour.
- To help detect and deter crime and antisocial behaviour.
- To provide evidential material for court proceedings.
- To aid in the overall management of public health and safety.
- To enhance community safety, assist in developing the economic well-being of the Three Rivers District and to encourage greater use of the

town centres, shopping areas, car parks and similar locations within the district.

- To assist the Council in their enforcement and regulatory functions within the district of Three Rivers; and
- To assist in traffic management.

3.2. Within this broad outline, Three Rivers District Council and the Three Rivers Community Safety Partnership will periodically review and publish specific key objectives based on local concerns in the Annual Community Safety Report.

4. Principles

4.1. The CCTV Systems will be operated in accordance with the principles and requirements of the Human Rights Act 1998.

4.2. The operation of the CCTV Systems will also recognise the need for formal authorisation of any covert 'directed surveillance' or crime-trend 'hotspot' surveillance, as required by the Regulation of Investigatory Powers Act 2000 and Police Policy. In these instances, the formal process outlined in the policy will be followed.

4.3. The CCTV Systems will be operated in accordance with the Data Protection Act 2018:

- They will be operated fairly and within the law.
- They will only be used for the purposes in which they are intended, and any other purpose which may be identified within the policy.
- They will be operated with due regard to the principle that everyone has the right to respect for his or her private and family life and home.
- Public interest will be recognised by ensuring the security and integrity of operational procedures.

4.4. Copyright and ownership of all material recorded by virtue of the CCTV Systems will remain with the Council as 'data controller'. Once an image or images has/have been disclosed to a partner such as the Police, the partner then becomes the Data Controller for the copy of that image(s). It is then the responsibility of that partner to comply with the Data Protection Act in relation to any further disclosures.

4.5. All persons operating the cameras must be trained and act with the utmost probity. Camera operators will be mindful of exercising prejudices, which may lead to complaints of the CCTV Systems being used for purposes other than those for which it is intended. The operators may be required to justify their interest in, or recording of, any individual or group of individuals or property.

4.6. Throughout this Policy it is intended, as far as reasonably possible, to balance the objectives of the CCTV Systems with the need to safeguard the rights of the individual. Three Rivers District Council as the 'owner' of both systems operates a complaints procedure (see 4.8) that ensures accountability for use of the CCTV Systems.

- 4.7. Cameras will not be used to investigate private residential property. Where the equipment permits, 'privacy zones' may be programmed into the system. These zones will ensure that the cameras do not survey the interior of any private residence. All contracted or directly employed staff of the Council, WCH, HCCTV and Hertfordshire Constabulary that have access to the CCTV Systems are contractually bound by regulations governing confidentiality and discipline.
- 4.8. A member of the public wishing to register a complaint about any aspect of the CCTV Systems may do so by using the Three Rivers District Council on-line portal [Compliments and complaints | Three Rivers District Council](#)
- 4.9. It is the responsibility of the Authorised Officers to ensure that every complaint is acknowledged within three working days and that a full response or progress report will be sent within ten working days.
- 4.10. Three Rivers District Council understands the need for transparency and clarifies the following points for Employees Only:
1. All employees are entitled to request a list of where and when cameras are active and a rational around the monitoring and privacy zones in the area in which they work.
 2. This policy provides clear guidance around access to CCTV footage and for what purpose it can be obtained. Employees may follow this process to request footage.
 3. The TRDC CCTV system, although active 24 hours a day, is not monitored 24 hours a day. Footage from specific times and dates can be obtained if needed.
 4. The police have the right to request CCTV footage from any system in relation to a Criminal investigation, Employees should be made aware that Police have a process to follow to request footage and that no footage will be released to police or any other agency without the appropriate process being followed.
 5. All individuals, including employees have the right to register a complaint regarding CCTV and it's usage in the workplace. In this case the employees should refer to the grievance procedure¹.

5. CCTV Codes of Practice

- 5.1. The Council will adopt the following guiding principles in line with the principles set out in the Surveillance Camera Code of Practice 2021:
- Use of a CCTV system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
 - The use of a CCTV system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

¹ HR Policies and Procedures - Intranet

- There must be as much transparency in the use of a CCTV system as possible, including a published contact point for access to information and complaints.
- There must be clear responsibility and accountability for all CCTV system activities including images and information collected, held, and used.
- Clear rules, policies and procedures must be in place before a CCTV system is used, and these must be communicated to all who need to comply with them.
- No more images and information should be stored than that which is strictly required for the stated purpose of a CCTV system, and such images and information should be deleted once their purposes have been discharged.
- 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.
- CCTV 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.
- CCTV system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- 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.
- When the use of a CCTV 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.
- Any information used to support a CCTV system which compares against a reference database for matching purposes should be accurate and kept up to date.

6. Location, Monitoring and Footage requests

Location

- 6.1. The areas covered by the CCTV systems to which this Policy refers are:
- Public areas within Three Rivers District Council's administrative buildings.
 - Areas in the district such as Rickmansworth, South Oxhey, Abbots Langley, Mill End and Chorleywood, where cameras may be deployed, Council owned Temporary Accommodation in Bury Lane, Rickmansworth and Lincoln Drive, South Oxhey. Locations of the deployable cameras are published on the Three Rivers District Council website at www.threerivers.gov.uk.
- 6.2. Mobile cameras may be deployed to cover any area within the boundaries of Three Rivers District Council. In line with the 'Deployment Procedure' section of this Policy.

- 6.3. CCTV may be installed in a covert manner, if authorised. Some cameras may be enclosed within 'all weather domes,' for aesthetic or operational reasons. The presence of all cameras will be identified using appropriate signage that will be placed in the locality of the camera and at main entrance points to relevant areas.
- 6.4. The signs will indicate:
- The presence of CCTV monitoring.
 - The 'owners' of the System.
 - The contact telephone number



Monitoring

- 6.5. To ensure compliance with the Information Commissioner's Data Sharing Code of Practice 2021 and to ensure that images recorded continue to be of appropriate evidential quality, the TRCSP CCTV System shall be maintained in accordance with the requirements of the Policy under a maintenance agreement. The maintenance agreement will provide for 'emergency' attendance on site by a specialist CCTV engineer to rectify any loss or severe degradation of image or camera control.
- 6.6. Faults identified, should be reported to and for the attention of the Community Safety Officer at antisocialbehaviour@threerivers.gov.uk. It will be the responsibility of the Community Safety Officer to report the concern to HCCTV in line with the maintenance agreement.
- 6.7. The responsibility for the monitoring and maintenance of the CCTV systems is as follows:
- The TRCSP CCTV system is the responsibility of HCCTV who will:
- Monitor and control all the cameras.
 - Store data received from the cameras for 25 days.
 - Provide reactive monitoring.
 - Dial into each mobile camera two times a day to check connectivity.
 - Send an engineer within seven working days if a camera fault arises.

- 6.8. The TRDC CCTV system is the responsibility of TRDC Property Services who will:
- Monitor and control the cameras.
 - Store the data.
 - Provide reactive monitoring.
 - Ensure that an engineer addresses a faulty camera within 7 days.
- 6.9. 'The Authorised Officer' is the designated person who holds responsibility for the overseeing of each CCTV system, all enquiries in relation to CCTV should be directed to the appropriate Authorised Officer as follows:
- TRDC CCTV system - Three Rivers District Council's Facilities Manager.
 - TRDC CCTV system Temporary Accommodation - Three Rivers Council Associate Director for Corporate, Customer & Community has authority to view the councils Temporary Accommodation CCTV and can approve any other officer the same permission.
 - TRCSP CCTV system - Three Rivers District Council's Community Safety Officer.
- 6.10. The Authorised Officers (6.9) will be responsible for the implementation of this policy. It will be the role of the Authorised Officer to ensure that contracts for the monitoring/maintenance of any of the CCTV systems are adhered to.

Footage Requests

- 6.11. The CCTV Systems can record images from selected cameras in real-time, produce hard copies of recorded images, replay, or copy any pre-recorded data at their discretion and in accordance with the Policy. Only Authorised Officers or contractors can retrieve footage from the cameras as below:
- For footage from TRDC CCTV system - TRDC Facilities Manager
 - For footage from TRCSP CCTV system – HCCTV staff
 - For footage from the TRDC CCTV Temporary Accommodation cameras - Three Rivers Council Associate Director for Corporate, Customer & Community has authority to view the councils Temporary Accommodation CCTV and can approve any other officer the same permission.
- 6.12. Public access to the TRDC CCTV Systems will be prohibited except for lawful, proper, and sufficient reasons. Any person granted permission will always be accompanied by an Authorised Officer who will record the visit as follows: -
- Date, time and duration of visit.
 - Authorised Officer accompanying the visitor or visitors.
 - Names and status of visitors; and
 - Purpose of visit
- 6.13. All visitors must sign the Visitors' Log, which incorporates a Declaration of Confidentiality. Any occurrence, which leads to comment during the visit, will also be the subject of record. No visits will take place or continue whilst a live incident is running.

6.14. Requests for public access to the TRCSP CCTV system can be accessed by visiting the Hertfordshire CCTV website <https://www.hertfordshirecctv.co.uk/public-viewing-request-form/> If the request is in relation to an incident that has been reported to the Police, the member of public must contact the relevant Police force as no footage relating to a crime will be released to anyone other than the Police.

Operation of the System by the Police

6.15. Under some circumstances the Police may make a request to assume direction of the TRDC CCTV System to which this Policy applies. Any requests may be made by email to the Authorised Officer by a Police Officer not below the rank of Inspector.

6.16. Hertfordshire Constabulary can access the footage from the TRCSP CCTV System to which this Policy applies. An information sharing agreement will be maintained by the Community Safety Partnership for this purpose.

7. Deployment Procedure for Three Rivers Community Safety Partnership CCTV

7.1. The procedure laid out in the Policy is applicable to all, without exception, Staff, Contractors, Police, Councillors, and members of the public.

DIAGRAM 1 – CCTV Deployment process



UNSUCCESSFUL APPLICATION – no further action

Application Submission

- 7.2. Applications for the deployment of the TRCSP CCTV can be made by:
- Any member of the Community Safety Partnership, with a Community Safety Board Member sponsor.
 - Public petitions: validly submitted in accordance with the Council's petition scheme as set out within the constitution.²
- 7.3. All viable applications will be assessed at the Community Safety Coordinating Group (CSCG), with a majority decision for successful or unsuccessful.

Evidence to support application

- 7.4. Any application requires evidence to support the deployment of cameras. The public and/or Council Members are encouraged to report anti-social behaviour or issues within an area to either Hertfordshire Police on 101 or <https://www.herts.police.uk/> or through the Three Rivers Community Safety Team [online reporting form](#). This will help to create a record that can be used as evidence.

Process

- 7.5. All applications, once received, become the responsibility of the Council's Community Safety Officer who is responsible for checking that the application is viable in terms of a suitable place to deploy the camera too. The application is then passed to all members of the Community Safety Coordinating Group who make the final decision on redeployments.
- 7.6. The Coordinating Group will be responsible for assessing and prioritising applications for the deployment of CCTV cameras using the following points as guidance in reaching their decision:
- The reason for the request.
 - If needed, is the application signed by a sponsor?
 - Have the requirements under current legislation been met?
 - Does the deployment require authorisation under RIPA and if so, has the appropriate authorisation been obtained?
 - Is the deployment of the CCTV scheme justified?
 - Is the deployment likely to achieve its objectives?
 - Can the success of these objectives be measured?
 - Is the equipment available?
 - Will the deployment clash with other deployments? If so, which is to be given priority?
 - Is there sufficient time to meet the request for the deployment of cameras?

- 7.7. The Community Safety Coordinating Group will provide a written

² <https://www.threerivers.gov.uk/services/your-council/council-constitution>

response to all requests for the deployment of CCTV cameras, whether the application is successful or not. No camera will be deployed without authorisation from the Community Safety Coordinating Group unless it is an emergency request, which can be authorised by the Community Safety Coordinating Group Chairperson.

- 7.8. If successful, no cameras will be deployed without a 14-day public consultation, with any resident or business it is deemed may be affected by the camera, unless it is an emergency, at which time consultation letters will be sent out advising residents of the camera's arrival. This must be authorised by the Community Safety Coordinating Group Chairperson. Only then will the Community Safety Officer instruct HCCTV to arrange deployment of the CCTV camera.

Permissions

- 7.9. In the event of an operation being mounted under the Regulation of Investigatory Powers Act 2000 (governing covert surveillance by public bodies) it is essential that if the cameras are to be mounted on property not owned by Three Rivers District Council or other Community Safety partners that the owner/occupier of the premises is spoken to personally and gives their written consent. This consent should be kept for the duration of the cameras use in this location. It is vital the owner/occupier is made aware that any images obtained from the camera mounted on their premises may be used as evidence and that under the rules of disclosure the defendant may be able to deduce from where the observations were conducted and that there is a possibility that they may be named in court.
- 7.10. Three Rivers District Council, in agreement with Hertfordshire County Council, may use approved columns and posts owned by Hertfordshire County Council. The agreement gives Three Rivers Designated Contractor permission to deploy cameras to these columns without the need for additional permission.
- 7.11. Special care must be taken when deploying a camera onto a listed building. Authorisation for the deployment may need to be obtained from Three Rivers District Council's planning department.
- 7.12. The installation of the CCTV cameras will be conducted as per the service level agreement between Three Rivers District Council and Hertfordshire CCTV (HCCTV). HCCTV will provide the Community Safety Officer with a copy of their Health and Safety Policy and Safe Working Practices regarding the installation, removal, and replacement of cameras.

8. Data Protection and Retention

- 8.1. All personal data obtained by virtue of the CCTV Systems within this policy shall be processed as laid out in 4.3. 'Processing' means obtaining, recording, or holding the information or data or conducting any operation or set of operations on the information or data, including:

- Organising, adapting, or altering the information or data.
 - Retrieving, consulting about, or using the information or data.
 - Disclosing the information or data by transmission, dissemination or otherwise making available; or
 - Aligning, combining, blocking, erasing, or destroying the information or data
- 8.2. Data will be stored securely in accordance with the requirements of the Data Protection Act 2018 and additional, locally agreed procedures. The Council's Community Safety Officer is responsible for the storage and retention of all paperwork connected with the TRCSP CCTV scheme with the same responsibility being held by the Council's Facilities Manager for the TRDC CCTV scheme. All documentation will be retained for two years from the date of the application.
- 8.3. The operation of the CCTV Systems has been notified to the Office of the Information Commissioner in accordance with Data Protection Legislation and as stated in 1.4 the 'data controller' is Three Rivers District Council.
- 8.4. All data will be processed in accordance with the principles of the Data Protection Act 2018, which include in summary, but are not limited to, the following:
- All personal data will be obtained and processed fairly and lawfully.
 - Personal data will be held only for the purposes specified.
 - Personal data will be used only for the purposes, and disclosed only to the people, shown within this Policy.
 - Only personal data, which is adequate, relevant, and not excessive in relation to the purpose for which the data is held, will be held.
 - Steps will be taken to ensure that personal data is accurate and where necessary, kept up to date.
 - Personal data will be held for no longer than is necessary.
 - Individuals will be allowed access to information held about them and, where appropriate, permitted to correct or erase it; and
 - Procedures will be implemented to put into place security measures to prevent unauthorised or accidental access to, alteration or disclosure of, or loss and destruction of information.
- Request for information (Subject Access)
- 8.5. Any request from an individual for the disclosure of personal data, which they believe is recorded by virtue of any CCTV System will be directed in the first instance to the Data Protection and Resilience Manager at Three Rivers District Council enquiries@threerivers.gov.uk
- 8.6. The principles of Part 3, Chapter 3 of the Data Protection Act 2018 (Rights of the Data Subjects) shall be followed in respect of every request.
- 8.7. If the request cannot be complied without identifying another individual, permission from all parties must be obtained (in the context of the degree of privacy they could anticipate from being in that location at that time) in accordance with the requirements of the legislation. If permission cannot

be obtained, footage not relating to that individual will be obscured.

- 8.8. Any person making a request must be able to prove his identity and provide sufficient information to enable the data to be located.
- 8.9. A copy of this Policy shall be published on the Councils' website and will be made available to anyone on request.

Exemptions to the Provision of Information

- 8.10. In considering a request made under the provisions of Part 3, Chapter 3 of the Data Protection Act 2018, reference may also be made to Schedule 2, Part 1 of the Act, which includes, but is not limited to, the following statement:

“Personal data held for the purposes of the prevention or detection of crime, or the apprehension or prosecution of offenders is exempt from the subject access provisions in any case to the extent to which the application of those provisions to the data would be likely to prejudice any of the matters mentioned in this subsection.”

Criminal Procedures and Investigations Act 1996

- 8.11. The Criminal Procedures and Investigations Act 1996 introduced a statutory framework for the disclosure to defendants of material that the prosecution would not intend to use in the presentation of its own case. This material is known as 'unused material.' Disclosure of unused material under the provisions of this Act should not be confused with the obligations placed on the data controller by Part 3, Chapter 3 of the Data Protection Act 2018, known as subject access.

Declaration of Confidentiality

- 8.12. Every Authorised Officer with responsibility under the terms of this Policy, who has any involvement with the TRDC CCTV System to which it refers, will be required to sign a declaration of confidentiality. (See Appendix A)
- 8.13. Every individual with responsibility under the terms of this Policy, who has any involvement with the TRCSP CCTV System to which it refers, will adhere to the terms of the Community Safety Partnership Information Sharing Agreement. (See Appendix B)
- 8.14. Each individual having responsibility under the terms of this Policy, who has any involvement with the CCTV Systems to which it refers, will be subject to the Council's Code of Conduct.
- 8.15. The Authorised Officers will have primary responsibility for ensuring that there is no breach of security, and that this Policy is complied with. Any severe breach of conduct will be dealt with accordingly, including, if appropriate, by criminal proceedings.

9. Management and Review

- 9.1. The CCTV Systems will be evaluated periodically. Designated Three Rivers staff will be responsible for the review of TRDC CCTV, and the Three Rivers Community Safety Team will be responsible for reviewing the TRCSP CCTV. The evaluation will normally include the following:
 - An assessment of the incidents monitored by the System.
 - A review of the Policy.
 - A review of the continuing relevancy of the purposes of the System; and
 - Any other factors which have been identified.
- 9.2. The results of any evaluation will be used to review, develop, and make any alterations to the specified purpose and objectives of the scheme as well as the functioning, management, and operation of the System. The TRCSP CCTV review will be shared at the Community Safety Board and Community Safety Coordinating Group before any changes are made to the current scheme.
- 9.3. Any major changes to this Policy, i.e. changes that have a significant impact on the Policy or upon the operation of the CCTV Systems, will require approval at Three Rivers District Council Policy and Resources Committee and the Community Safety Partnership.
- 9.4. It has been agreed that minor changes, such as terminology, clarification, or administrative corrections with no significant impact, will be included in the Policy with agreement from the Associate Director for Corporate, Customer and Community who has delegated authority.

Glossary

TRDC	Three Rivers District Council
TRDC CCTV	Three Rivers District Council Closed Circuit Television
TRCSP	Three Rivers Community Safety Partnership
TRCSP CCTV	Three Rivers Community Partnership Closed Circuit Television
HCCTV	Hertfordshire Closed Circuit Television
HCC	Hertfordshire County Council
CSCG	Community Safety Partnership
CSB	Community Safety Board
RIPA	Regulation of Investigatory Powers Act



THREE RIVERS

Community Safety Partnership

Community Safety Board

Confidentiality Statement

The purpose of this confidentiality statement is to allow all person's present at the Community Safety Board an opportunity to share sensitive information.

This information sharing is a key part of maintaining the minimum standards, set out in the Terms of Reference.

There is an expectation, that persons present today, will already be representing agencies signed up to the information sharing protocol. No sensitive information is to be shared outside of this meeting.

.....
Both designated CCTV officers agreement to this document

Three Rivers District Council CCTV designated Officer
Tracey Langley, TRDC Facilities Manager
Signed
Date

Three Rivers Community Safety Partnership designated officer
Jemma Duffell, Community Safety Officer
Signed
Date



Three Rivers Community Safety Partnership

Information Sharing Agreement

Between:

Three Rivers District Council and the following Partner Organisations:

- Hertfordshire County Council Adult Care Services
- Peabody Housing Association
- Change, Grow, Live – Spectrum
- Children’s Services
- Chessbrook School
- Citizen Advice Service Three Rivers
- Clarion Homes
- County Community Safety Unit
- Emerging Futures
- Hertfordshire Beacon
- Hertfordshire Constabulary
- Hertfordshire County Council
- Hertfordshire Partnership Foundation Trust
- Hertfordshire Probation Service
- Herts Fire and Rescue Service
- Herts Help
- Herts Mind Network
- Herts Valleys Clinical Commissioning Group
- Hightown Housing
- Origin Housing
- Homegroup
- L&Q
- Neighbourhood Watch
- NHS
- Office of the Police and Crime Commissioner
- Paradigm Housing
- Refuge
- Sovereign Network Group
- Sanctuary Housing
- Specialist Adolescent Services Hertfordshire
- Services for Young People



- St Albans Refuge
- Stevenage Borough Council-No More Service
- Thrive Homes
- Trading Standards
- Turn around Project
- Watford Community Housing
- West Herts College
- Watford and Three Rivers Trust

1. Introduction

1.1. This Information Sharing Agreement (hereafter known as the Agreement) provides a framework for the lawful sharing and processing of information required for the Three Rivers Community Safety Partnership also known as the CSP, comprising of the Community Safety Board, Community Safety Co-ordinating Group, Anti-Social Behaviour Action Group, Youth Action Panels and any other task and finish group set up under the terms of reference of the Community Safety Partnership.

1.2. This document outlines the process that all parties included in this Agreement will follow to ensure information is shared in a responsible, fair, and lawful manner. It has been developed in accordance with the Home Office document, Information sharing for Community Safety – Guidance and Practice advice (2010).

2. Community Safety Partnerships

2.1 Community Safety Partnerships (CSP) were established as a statutory requirement, under the Crime and Disorder Act 1998, to bring together local partners to formulate and implement strategies to tackle crime, disorder, and Anti-social behaviour in their communities. CSPs work on the principle that no single agency can address all drivers of crime and anti-social behaviour, and that effective partnership working is vital to ensuring safer communities.

2.2 Efficient and effective information sharing between relevant partners is essential to developing intelligence-led and outcome focussed practice for the CSP.

2.3 Information that is shared between partner agencies can be via electronic means, paper records, or verbally and can include the transfer of sensitive personal information, personalised information, depersonalised information, and non-personal information.



2.4 The information sharing protocol provides a framework for the CSP to exchange and use information so that:

2.4.1 Responsible authorities within the CSP can meet their legislative obligations effectively.

2.4.2 All partner agencies can govern and manage the secure use, storage, and transfer of data.

2.4.3 Clear processes are in place for the partnership to respond to Freedom of Information Requests, data subject access requests, data rectification or deletion requests, and personal data breaches.

3. Three Rivers District Council

3.1 Three Rivers District Council is the strategic lead authority for the Three Rivers Community Safety Partnership (CSP) and is responsible for managing and co-ordinating the agendas, plans and performance of the CSP structures.

3.2 Three Rivers District Council will work in partnership with the partner organisations signed up to this information sharing Agreement, to receive data, and share this data at appropriate structural levels of the partnership for the partnership to function.

3.3 Three Rivers District Council will be the Data Controller regarding the collective information gathered and shared within the structures of the CSP.

3.4 Individual partner agencies contributing data to the partnership will retain the data controller responsibility for the individual pieces of information shared with the partnership.

4. Purpose

4.1. The purpose of the Agreement is to facilitate the secure use, storage, and exchange of information between partner agencies within the CSP.

4.2. Information sharing is required for the following purposes:

1. Community Safety Board

Purpose	Personalised data/sensitive personal data	Depersonalised data	Non-personal information
Strategic assessment and setting of		<ul style="list-style-type: none"> • police recorded crime • police disorder incident records 	Budget and expenditure data



THREE RIVERS
Community Safety Partnership

priorities and plan Performance management		<ul style="list-style-type: none"> • council recorded ASB and environmental crime • fire and rescue deliberate fires, and malicious calls • probation data • housing provider ASB and environmental crime data • youth Offending data • community Surveys and consultations • agency performance data • project performance data • drug and alcohol data. • school exclusions • A&E and ambulance data 	
Agreement of Prevent Plan			Summary of Counter-terrorism local plan actions and performance
Agreement of Hate Crime Plan			Summary of local plan, actions, and performance
Sponsor CCTV camera deployment applications		<ul style="list-style-type: none"> • individual members can be approached to sponsor application form for camera deployment • only sponsored applications or petitioned applications will be heard at Community Safety Coordinating group 	

2. Community Safety Co-ordinating Group



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Purpose	Personalised data/sensitive personal data	Depersonalised data	Non-personal information
Action Plan Implementation Problem Solving	Offender data Victim data	<ul style="list-style-type: none"> • police recorded crime. • Police disorder incident records • council recorded ASB and environmental crime • fire and rescue deliberate fires, and malicious calls • probation data • housing provider ASB and environmental crime data • youth offending data • Community Surveys and consultations • agency performance data • project performance data • drug and alcohol data. • school exclusions • A&E and ambulance data • domestic Abuse referral data 	Budget data Geographical hotspot data
Project Management		<ul style="list-style-type: none"> • performance data 	Budget data
Delivery of Prevent Plan		<ul style="list-style-type: none"> • review of Counter Terrorism local plan • review of Channel Panel and Prevent referrals 	
Offender Management	Prolific and Priority Offender data review. Serious and Organised Crime Nominals	<ul style="list-style-type: none"> • review of Serious and Organised Crime Groups 	



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Community Safety Partnership

Agree CCTV deployment applications		<ul style="list-style-type: none"> • application completed and returned • viability checks carried out • application presented at Community Safety Coordinating group • successful/unsuccessful decision made • 14-day public consultation • deployment of camera 	
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3. Anti-social behaviour action Group

Purpose	Personalised data/sensitive personal data	Depersonalised data	Non-personal information
Agreement of joint action plans	Offender data Victim data Witness data. Draft Enforcement data Hoarding data		
Review and implementation of joint action plans	Offender data Victim data Witness data. Enforcement data		

5. Youth Action Panel

Purpose	Personalised data/sensitive personal data	Depersonalised data	Non-personal information
Agreement of joint action plans	Offender data Victim data Draft enforcement data	Hotspot data	



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Community Safety Partnership

Review and implementation of joint action plans	Offender data Victim data Enforcement data	Hotspot data	
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6. Casework

Purpose	Personalised data/sensitive personal data	Depersonalised data	Non-personal information
Individual casework management by partner agency Prosecutions Applications for injunctions, orders, etc Issuing of Community Protection Warnings / Community Protection Notices	Offender data Victim data Witness data Enforcement data Vulnerability data Use of service data (e.g. mental health, children's services, adults social care etc)		Budget data

4.3 Information may also be shared between partners as part of County-wide schemes including: Families First, Child Safeguarding, Safeguarding of Adults at Risk, Multi-Agency Risk Assessment Conferences, MAPPA, and Integrated Offender Management, Youth Action Panels, MACE One and Two. Such schemes will have their own information sharing arrangements which partner agencies will sign up to separately.

5. Principles

5.1. This Agreement recognises that sharing information safely and efficiently is integral to delivering interventions, solutions and improvements to crime and disorder which are victim focussed, effective and cost effective.

5.2. Relevant data will be shared on a case-by-case basis and only ever subject to compliance with relevant data protection legislation to meet the stated objectives outlined in this Agreement. This may include the following types of personal and sensitive personal information: name, address, date of birth, telephone number, details of any children, relevant physical and mental health needs, relevant social care information, relevant information from a person's housing tenancy, housing or homelessness risk, environmental health issues, incident and crime data, enforcement data, involvement in crime and disorder (as a perpetrator, victim or witness) and risks of & responses to domestic abuse.



5.3. The sharing, storage and use of any Information will comply fully with the requirements of data protection legislation and regulations and all relevant associated legislation and will follow best practice guidance issued by the *Information Commissioner's Office*.

5.4. The sharing, storage and use of Information may be subject to a *Data Protection Impact Assessment*, if necessary, undertaken by the Data Controller of the Information in each partner organisation. Each partner organisation will be responsible for its own compliance with the data protection regulations and legislation as well as all other relevant legislation ensuring that it has appropriate local policy and process frameworks in place to underpin best practice, safeguard information and protect the legal rights of data subjects.

5.5. In addition to providing robust justification for the sharing of Information for specified purposes, Data Protection Impact Assessments completed by each partner organisation will evidence compliance with the principles of the data protection regulations and legislation and the revised Caldicott Principles. This will include the data protection principles that:

5.5.1 - Processing of personal data for law enforcement must be lawful and fair.

5.5.2 - The law enforcement purpose for which personal data is collected must be specified, explicit and legitimate, and data will not be processed in a manner incompatible with the purpose for which it was collected.

5.5.3 - Personal data processed for law enforcement must be adequate, relevant, and not excessive in relation to the purpose for which it is processed.

5.5.4 - Personal data processed must be accurate, kept up to date, and that every reasonable step is taken to ensure that personal data that is inaccurate, is erased or rectified without delay.

5.5.5 - Personal data processed for law enforcement must be kept for no longer than is necessary for the process for which it is processed. Appropriate time limits will be set for the periodic review of the need for continued storage of personal data.

5.5.6 - Personal data that is processed for law enforcement must be processed in a manner that ensures appropriate security of personal data, using appropriate technical or organisational measures.

6. The Process for information sharing – Community Safety Partnership Board and Community Safety Co-ordinating Groups

6.1 The lead officer for co-ordinating the CSP Board will be Three Rivers District Council's Community Safety and Safeguarding Manager assisted by Three Rivers District Council's Committee Manager who will lead on agendas, minutes and the maintaining of the list of partner representatives. The lead officer for Community Safety Co-ordinating Group will be Three Rivers District Council's Community Safety



and Safeguarding Manager assisted by Three Rivers District Council's Community Safety Officer who will lead on agendas, minutes and maintaining the list of partner representatives.

6.2 Each partner agency, and relevant service area (where more than one service area is required to share information with the partnership) will identify a lead officer for the purposes of co-ordinating the sharing of information with the CSP Board and Community Safety Co-ordinating Group. Three Rivers District Council's Community Safety and Safeguarding Manager will maintain a record of these leads.

6.3 Meetings of the CSP that discuss personal or restricted data will not be held in public. The papers of such meetings will therefore remain restricted and confidential to the attendees of the CSP Board or Community Safety Co-ordinating Group. Attendees of the each CSP Board or Community Safety Co-ordinating Group will be noted and, on the minutes, to confirm compliance with the data protection principles and this information sharing agreement. Any attendees of such meetings will be advised by partner agencies in advance.

6.4 The CSP does not require formal requests for information exchanged for the purposes of the CSP Board or Community Safety Co-ordinating Group e.g. on a form, where this takes place between the officers designated by partner agencies as outlined in sections 6.1-6.2 or their nominated deputies. Information exchange between these nominated officers can be done by email, phone and through meetings.

6.5 Information exchanged will be shared securely. Electronic exchange is the most secure and auditable means of exchanging information between partners using secure technology. Where information is requested by telephone by officers known to each other, this will be shared securely where possible. Where officers are unknown to partner agencies, requests must come in email format.

6.6 Attendees of the CSP Board and Community Safety Co-ordinating group are responsible for the safe storage of information received for the purpose of the meeting. Information will be retained by each partner agency in accordance with their data retention policies. Data should be stored by each partner agency in a secure manner, with access restricted to those officers within the partner agency needing to process the data.

6.7 Protective markings will be put on key documents such as 'Official Sensitive' in accordance with Government Security Classifications. For example, police intelligence documents will be marked 'Official Sensitive – Operational' as they will contain information only intended for the specific audience of the CSP structure. Such information cannot be shared more widely than those attending the relevant meeting of the CSP without the express permission of the supplier from where the



information originated. Such information should not be quoted in partner agency publicity or internal reports without the originator's permission.

6.8 Reference to the Information Sharing Agreement will be made at the beginning of each meeting and partners are expected to adhere to the Agreement during both in person and virtual meetings.

7. The process for Information Sharing - Anti-Social Behaviour Action Group and Youth action panel

7.1 The lead officer for co-ordinating the Anti-social Behaviour Action Group and the Youth Action Panel will be Three Rivers District Council's Anti-Social Behaviour Officer to include agendas, minutes and the maintaining of a list of partner representatives.

7.2 Individual partner agencies will be asked to share relevant information in advance of the ASBAG and Youth Action Panel meetings by the Three Rivers District Council Anti-Social Behaviour Officer and will then be shared as deemed appropriate by the said officer. Three Rivers District Council should securely share information.

7.3 Individual partner agencies will be asked to prepare for such meetings by collecting relevant personal information regarding current crime and disorder, including sensitive personal information about offenders, victims, and witnesses in relation to their health and social care. This information will be shared during meetings to inform the development of action plans. No individual agency notes that contain personal information from partner agencies should be taken outside of such meetings by attendees who will be required to sign an attendance list and confirm compliance with this information sharing protocol. Minutes/notes will be taken by the relevant officer and shared securely following the meeting. Attendees of the meeting may keep individualised notes of the actions required of their agency but should do so in a way that is secure and does not contain personal identifying information.

7.4 Casework information may be shared between partner agencies between meetings to update on action plans and enforcement strategies. Such information should be shared between named individuals agreed within the relevant action group, using secure electronic means. Information may be shared between known officers of partner agencies by telephone.

7.5 Any information shared will be stored securely by partner agencies, with access limited to officers required to process the data for the purposes of reducing crime and disorder, or for the purposes of providing health or social care services to an individual affected by crime and disorder. Data will be stored according to the data retention policies of the relevant agency.



7.6 Each partner is responsible for how they will record the instances of sharing information to provide evidence that this is in accordance with the legal framework. Secure emails and meeting notes can contribute to this record keeping, but partners may also wish to use a form to capture lawful basis and purpose for sharing outside of the action group meeting.

8. Legal Basis

8.1. There are three principal Acts that provide the legal power for sharing information for the purposes of community safety:

- The Crime and Disorder Act 1998
- The Police and Justice Act 2006, and the Crime and Disorder (Overview and Scrutiny) Regulations 2009 made under the Act
- The Criminal Justice and Court Service Act 2000

8.1.1 Section 115 of the Crime and Disorder Act provides a legal basis for sharing information between CSP partner agencies where it is necessary for fulfilling the duties contained in the Act. The key conditions to consider under Section 115 are:

- 'relevant authorities' have the power (but not a legal duty) to share information if it is necessary for the purposes of any provision under the Crime and Disorder Act. This would include where it is necessary for the formulation and implementation of the local Crime and Disorder Reduction Strategy
- This power does not override other legal conditions governing information sharing. These principally relate to the Data Protection Act 1998, the Human Rights Act 1998 and the common law of confidentiality (see Section 2.4.2.)
- Personal information can be shared without the permission of the person to whom it relates. However, the legal conditions governing the sharing of personal information must be followed

8.1.2 The Police and Justice Act, and the Crime and Disorder (Overview and Scrutiny) Regulations 2009 made under the Act incorporate the following duty that relates to information sharing:

- When requested by a crime and disorder committee, responsible authorities and cooperating bodies are under a duty to share with the committee information that relates to the discharge of the authority's crime and disorder functions, or that relates to the discharge by the committee of its review and scrutiny functions under section 19 of the Police and Justice Act. This duty only applies under the following conditions:



- The information should be depersonalised information, except when the identification of an individual is necessary or appropriate to enable the crime and disorder committee to properly exercise its powers; and
- It should not include information that would prejudice legal proceedings, or the current or future operations of the responsible authorities

8.1.3 Section 115 of the Crime and Disorder Act (1998) allows relevant authorities to share information for the purposes of community safety. The relevant authorities are:

- District or Borough and County Council
- Police Force
- Police and Crime Commissioner
- Fire and Rescue Authority
- Clinical Commissioning Groups
- Probation Service
- A person registered under Section 1 of the Housing Act (1998) as a social landlord (by virtue of Section 219 of the Housing Act (2004))

8.1.4 The Criminal Justice and Court Service Act (2000) provides for a specific duty for the Police and Probation to share information to make joint arrangements for the assessment and management of the risks posed by offenders who may cause serious harm to the public.

8.1.5 Other partners can be asked to cooperate if they are important in supporting the development of strategic assessments and partnership plans (detailed in section 5(2)(c) of the Crime and Disorder Act (1998)). In addition, Registered Social Landlords (RSLs) in England are made co-operating bodies with responsible authorities of CSPs.

This does not override other legal conditions governing information sharing within data protection legislation, the Human Rights Act, and the common law of confidentiality.

8.1.6 The lawful basis for processing personal data under Article 6 of the General Data Protection Regulation (GDPR) is (e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

8.1.7 The lawful basis for processing special categories of personal data under Article 9 of the General Data Protection Regulation (GDPR) is (g) - processing special category data (sensitive data) for reasons of substantial public interest.



8.1.8 The lawful bases under Schedule 1 of the Data Protection Act 2018 (DPA), for processing special categories of personal data and criminal conviction data are:

- Schedule 1, Part 2, Section 6 – Statutory and government purposes
- Schedule 1, Part 2, Section 10 – Preventing and detecting unlawful acts
- Schedule 1, Part 2, Section 18 – Safeguarding of children and of individuals at risk

8.1.9 Or where appropriate under Schedule 2 of the DPA – exemptions etc. from the GDPR – Schedule 2, Part 1, 2 (1) which permits data sharing for (a) the prevention or detection of crime, (b) the apprehension or prosecution of offenders, or (c) the assessment or collection of a tax or duty or an imposition of a similar nature.

8.1.10 Personal data processed for a law enforcement purpose is under Part 3 of the DPA. The lawful bases for processing special categories of personal data for a law enforcement purpose are:

- Schedule 8, Section 1 – Statutory etc. purposes
- Schedule 8, Section 4 – Safeguarding of children and of individuals at risk

8.2. Legal basis for sharing casework information, including through the Anti-Social Behaviour Action Group (ASBAG).

8.2.1 In addition to the grounds outlined in 8.1 casework information will share personal sensitive information. The Crime and Disorder Act 1998 Section 115 - provides that any person (whether a private individual or member of a public body) can lawfully disclose information, where necessary or expedient, for the purposes of any provision of the Act, to a relevant authority or a person acting on behalf of such an authority, even if he or she would not otherwise have this power. Under the Act "relevant authority" means: the chief officer of police, the police authority, the local authority, the probation committee, or the health authority.

8.2.2 Data protection legislation allows for the exchange of information where it is for the performance of a public task, a substantial public interest condition has been met or is necessary for the prevention or detection of crime, the lawful bases have been identified above in section 8.1.

8.2.3 Consent of the data subject requesting the investigation of anti-social behaviour/domestic abuse will be sought by the agency receiving the complaint, and explicit consent will be sought to process the data, and to share the data within the Community Safety Partnership.

8.2.4 Personal sensitive information can be shared and processed within these structures of the Community Safety Partnership without consent when:



- The processing is necessary for law enforcement purposes including the prevention, investigation, detection or prosecution of crime and disorder or the safeguarding of a child or adult at risk,

9. Consent

9.1.1 Explicit and informed consent will be necessary for partner organisations to share victim information with the Anti-Social Behaviour Action Group or any ASB partner agency – unless relating to section 8.2.4.

9.1.2 Before informed and explicit consent is obtained for sharing victim of ASB information the relevant partner organisation will clearly explain how relevant and appropriate Information will be handled, used and shared. This information will be made available in written form as a Data Privacy Notice that complies with data protection legislation and regulation requirements.

9.1.3 When an ASB victim is asked for consent they must have the capacity to consent and understand how Information will be shared and used. The following information must also be recorded:

- whether consent was given
- if so, how it was given – e.g. verbally, written.
- date and time consent was obtained.
- that the victim understands how and why the Community Safety Partnership will share information

9.1.4 If an ASB victim refuses to consent to share information with other partner agencies then the relevant partner agency will be limited to offering service solutions from those available from their own services.

9.2. Crime

9.2.1 Information sharing at the Community Safety Co-ordinating Group, ASBAG, Youth Action Panel and within relevant multi-agency casework about criminal activity will not require the consent of the data subject when the purpose of the data sharing is to reduce crime and disorder and is within the requirements of this agreement.

9.3. Health and social care information

9.3.1 Where partner agencies have a duty to safeguard a child or adult at risk, they will share information under the relevant information sharing agreements of



Hertfordshire's Safeguarding Children Partnership and Hertfordshire Safeguarding Adults Boards.

9.3.2 Partner agencies may share relevant personal, health and social care information about victims and perpetrators of crime and anti-social behaviour when it is relevant to the response made to the crime and disorder. Where required under data protection legislation consent should be sought for sharing this information. However, it may be shared between relevant partners without consent where:

9.3.2.1 The processing is necessary for the exercise of any other function of a public nature, exercised in the public interest e.g. for the prevention, investigation, detection and prosecution of crime, or the safeguarding of a child or adult at risk.

9.3.3. A clear record should be kept by the relevant partner agency when they share personal, health or social care information with the partnership about an individual and whether they have done so with or without consent.

9.3.3 Herts Valleys Clinical Commissioning Group (HVCCG) will only receive depersonalised data and non-personal information in relation to the Community Safety Partnership.

9.3.4 No partner agency will send HVCCG personal data, or sensitive personal data in relation to the business of the Community Safety Partnership.

9.3.5 Should partner agencies need to share information with, or request information from, health service providers during any community safety casework this should be directly with the relevant National Health Service (NHS) provider and not HVCCG.

9.3.6 Any agency requiring guidance on which NHS provider they wish to make the request from should contact Three Rivers District Council's Community Safety and Safeguarding Manager.

10. Three Rivers District Council Obligations

10.3. Three Rivers District Council will only use information in accordance with the purposes as stated in this agreement and subsequent legislation affecting the operation of Community Safety Partnerships. Three Rivers District Council will always observe and comply fully with the provisions of relevant data protection legislation.

10.4. Officers of Three Rivers District Council use offices at Three Rivers House which are locked, have secure storage and are not accessible to the public / service users.



10.5. Three Rivers District Council will store information securely by ensuring that any devices are secure and do not store paper copies.

10.6. Three Rivers District Council will only share information with other partner organisations signed up to this information sharing agreement and nominated attendees of the relevant structure of the Partnership (Board, Co-ordinating Group, ASBAG, and Youth Action Panel).

10.7. Three Rivers District Council will ensure only relevant officers and members have access to the information shared within the partnership, and only on a need-to-know basis.

10.8. When undertaking casework Three Rivers District Council will be sensitive to individual service user's fears and concerns about information sharing. Case workers must have the approval of service users to make referrals, other than in situations requiring an emergency response or the safeguarding of a child or adult at risk.

10.9. Three Rivers District Council will ensure that staff processing information are suitably trained and made aware of their responsibilities in handling data.

10.10. Three Rivers District Council will use anonymised information for reporting and analysis of the community safety partnerships action plans. All information used in the sharing of learning or case studies with other organisations will be anonymised.

10.11. Casework information with sensitive personal information will only be shared with nominated recipients of organisations attending casework structures of the partnership who have signed up to this information sharing agreement.

10.12. Three Rivers District Council will ensure information is shared securely by using appropriate password protected files and restricted markings on all relevant documents as needed.

10.13. Three Rivers District Council shall notify all relevant partner organisation's signatory immediately if it becomes aware of any unauthorised or unlawful processing, loss of, damage to, or destruction of personal information. In addition, Three Rivers District Council will immediately notify relevant and interested partner organisations of any actual or potential data breach to allow such organisations to comply fully with their obligations relating to data breaches contained in the GDPR.



10.14. Three Rivers District Council will notify all relevant partner organisations' signatories of any relevant data subject access requests, requests to destroy data, changes in consent to process data, and requests to correct data that are received in relation to the work of the Community Safety Partnership. Both the Community Safety Partnership Board and Community Safety Co-ordinating Group will be notified prior to the above actions being carried out.

10.15. Three Rivers District Council will publish contact details of its data controller for the Community Safety Partnership, its data protection officer, and the purpose for which it is processing personal data through a data privacy notice. This will explain the rights of data subjects to access personal data, rectify personal data and erase or restrict the processing of personal data, and the right to lodge a complaint with the Information Commissioner. It will provide information on how long data is stored, the categories of data held and other information for a data subject to be able to exercise their rights.

11 Partner Organisation Obligations

Each Partner Organisation to this Agreement shall:

11.1 Have appropriate organisational, procedural, physical and technical safeguards in place to ensure its full compliance with the requirements of all relevant data protection legislation and regulations in relation to the processing of all Information shared through this Agreement.

11.1 Remain individually responsible for the accuracy of information they share and ensuring that it is up to date when transferring any data to Three Rivers District Council and other partners signed up to this agreement.

11.2 Ensure all individuals involved in the work of the Community Safety Partnership are aware of this Agreement and the processes in place for sharing information securely.

11.3 Ensure all supporting policies and procedures necessary to comply with the Agreement are implemented within their own organisation.

11.4 Ensure that all staff engaged in the sharing of information as outlined in this Agreement has received suitable and adequate training on the security and confidentiality of information.



11.5 Not knowingly or negligently process information shared through this Agreement in such a way that it places any partner organisation in breach, or potential breach of any relevant data protection legislation, regulations, or any associated legislation.

11.6 Comply with any specific requirements specified by a partner organisation regarding the processing of information which that partner organisation may share through this Agreement.

11.7 Ensure information is shared securely by using secure email systems.

11.8 Ensure that nominated recipients of information for the different structures of the partnership are updated by contacting the Community Safety and Safeguarding Manager at Three Rivers District Council.

11.9 Publish contact details of its data controller for the information it supplies to the partners, its data protection officer, and the purpose for which it is processing personal data through a data privacy notice. This will explain the rights of data subjects to access personal data, rectify personal data and erase or restrict the processing of personal data, and the right to lodge a complaint with the Information Commissioner. It will provide information on how long data is stored, the categories of data held and other information for a data subject to be able to exercise their rights.

12 Retention, Storage and Destruction

12.1 Any Information held will not be retained by Three Rivers District Council or partner organisation under this agreement for any longer than is necessary for the purpose that it was obtained.

12.2 All partner agencies will maintain data retention policies and schedules in relation to the different types of information received and processed by the Community Safety Partnership.

12.3 If the Information Sharing Agreement expires then any information held by Three Rivers District Council and by partner agencies will be securely deleted following the fulfilment of any transfer arrangements and relevant storage periods.

12.4 If a member of the public / service user / victim permanently terminates their engagement with the casework structures of the partnership then any information held on them will be securely deleted after a storage period of six years or otherwise in accordance with the relevant partner organisations retention policy.



13 Requests for Information

13.1 Any Subject Access Request (SAR), or request under Freedom of Information (FOI) legislation, will be handled in line with the individual partner organisation's respective Data Protection and FOI policies. Fulfilment of any subject access requests made to a partner organisation where information has been processed and shared under this agreement will be supported by Three Rivers District Council and all relevant partners. The Head of Strategy and Partnerships at Three Rivers District Council should be contacted by any partner agency receiving a SAR or FOI request that captures information disclosed to them under this agreement. They will contact the relevant nominated officers at all relevant partner agencies to determine whether they wish to claim an exemption or have any objections under the provisions of the relevant Act before disclosure takes place. Three Rivers District Council will advise partners within 5 working days of a SAR or FOI being received.

13.2 Where partner agencies are requested to rectify, erase, or restrict the processing of personal data that it has already shared with the Community Safety Partnership – it is the responsibility of the partner who shared the information to investigate and to update all partners of the outcome through the Head of Strategy and Partnerships at Three Rivers District Council. All partners agree to ensure that such updates are actioned, and inaccurate data is destroyed.

14 Complaints and Breaches

14.1 Any member of the public or service user wishing to make a complaint should do so through: -

- a) The complaints procedure of the organisation that has caused concern
- b) Directly contacting the organisation that has caused concern
- c) contacting Three Rivers District Council as the lead authority for the Community Safety Partnership.

14.2 Where a complaint relates to the processing of information, storage of information, accuracy, or loss of information by a partner agency within the agreement, the complainant will be directed to the relevant partner agency to resolve the complaint.

14.3 Where a complaint relates to the processing of information, storage of information, accuracy, or loss of information by the partnership, the complaint will be managed by Three Rivers District Council. Partner Organisations' nominated contacts on the relevant structures of the partnership will co-operate with the investigation of that complaint.



14.4 Any partner organisation that causes or is made aware of a breach or a potential breach in personal data received through the partnership will advise Three Rivers District Council immediately on becoming aware, in order that the relevant agency can determine whether the breach is reportable in accordance with its obligations under the relevant data protection legislation. The Community Safety and Safeguarding Manager should be the initial point of contact for this process. All partner organisations will co-operate fully with each other in assisting the relevant p partner organisation in the event of a data breach.

15 Review of the Agreement

15.1 The Agreement will be reviewed in November 2026 unless:

- a) there is a change in legislation or guidance that could affect the operation of this agreement
- b) As a result of a breach or complaint 16.2

15.2 This Agreement shall commence on 1ST December 2024.

15.3 Any changes that are made at the review date will result in a revised agreement being issued for agreement and signature by all parties.

15.4 This Agreement governs the manner and method in which the parties agree to share personal data within Three Rivers Community Safety Partnership. It is supplemental to any other agreements between the parties and is not intended to replace any such agreements.



GLOSSARY OF TERMS

Anti-social behaviour action group (ASBAG)	The multi-agency group established to manage medium- high risk cases of anti-social behaviour across the agencies within Three Rivers.
ASB	Anti-social behaviour
Commencement Date	Means the date on which this Agreement starts
Community Safety Board	The Responsible Authority Group of the Community Safety Partnership as defined in legislation and guidance and the terms of reference of the Three Rivers Community Safety Partnership.
Community Safety Co-ordinating Group	The Joint Action Group of the Community Safety Partnership as defined in legislation and guidance and the terms of reference of the Three Rivers Community Safety Partnership.
Data Controller	The person on who the obligation to process the data is imposed by an enactment, to process the data, and by means by which it is required by an enactment to be processed. Or the



THREE RIVERS

Community Safety Partnership

Data Processor	competent authority which alone or jointly determines the purposes and means of the processing of personal data. Any person who processes personal data on behalf of the controller (other than an employee of the controller).
Data protection impact assessment	A process to help an organisation identify and minimise the data protection risks of a project or process.
Data Subject	The identified or identifiable living individual to whom personal data relates.
De-personalised data	Aggregated data that cannot be used to identify the individuals whose data is has originated from.
Information	Means all the Personal and Sensitive Personal Data along with any other information being collected and processed about crime and disorder under this Agreement
Non personal data	Data not related to individuals
Partner Organisation(s)	Means the organisations signed up to this Information Sharing Agreement who form part of Three Rivers Community Safety Partnership.
Personal Data	Any information relating to an identified or identifiable living individual.
Privacy Notice	An explanation of how an agency collects personal information, the purpose of processing data, retention periods and who it will share information with.
Review Date	Means the date on which this Agreement is reviewed.
Special Category Data	Data that reveals a subjects racial or ethnic origin, political opinions, religious or philosophical beliefs.
Three Rivers Community Safety Partnership (CSP)	The statutory partnership of agencies established under the Crime and Disorder Act 2018 Police and Justice Act 2003 and subsequent legislation required to undertake strategic assessments of crime and disorder, to develop local delivery plans for crime and disorder reduction and performance manage crime reduction targets and services within Three Rivers.



Youth Action Panel

The multi-agency group established to manage serious youth violence victims and perpetrators across key services within Three Rivers, Watford, and Hertsmere.

Appendices 1

Agreement

On behalf of the agencies they represent, the parties named below agree to the sharing of personal data between their agencies only where the requirements of this Information Sharing Agreement and Protocol are fully met. The representative signatures are from persons who currently attend one or more of the Community Safety Partnership Groups (Community Safety Board, Community Safety Coordinating Group, Anti-Social Behaviour Action Group and the Youth action panel) at the time of publication. Each person is signing on behalf of their organisation as it is accepted that the personal may be interchangeable, it is the responsibility of that organisation to notify Three Rivers District Council Community Safety and Safeguarding Manager. If representatives attend more than one of the below groups they are only required to sign once.

Community Safety Partnership Board

Agency / department	Representative name	Position / job title	Signature	Date
Three Rivers District Council	Kimberley Grout	Associate Director Corporate, Customer and Community		



THREE RIVERS
Community Safety Partnership

Hertfordshire Constabulary	Andrew Palfreyman	Chief Inspector		
Thrive Homes	Elsbeth Mackenzie	Chief Executive		
Three Rivers District Council	Councillor Andrew Scarth	Lead member for Community Safety & Housing		
Hertfordshire County Council	Michael Nadasdy	Programme Manager CCSU		
Watford Community Housing Trust	Tina Barnard	Chief Executive		
Probation Service	Marc Kahn	Operations Manager		
Hertfordshire Office of Police and Crime Commissioner	Phoebe Allsopp	Policy Officer		
Hertfordshire Fire and Rescue	Keith Harland	Group Commander		
Thrive Homes	Cheryl Lloyd	Executive Assistant		
Hertfordshire County Council	Gary Ray	Community Protection Manager		

Community Safety Co-ordinating Group

Agency / department	Representative name	Position / job title	Signature	Date
Citizen Advice Bureau	Peta Mettam	Chief Officer		
Herts Mind Network	Karlie Baecke	Service Manager		
Services for Young people	Kips Green	Service Manager		
Change, Grow, Live	Pinder Chaggar	Deputy Service Manager		
Trading Standards	Rachel Wenzel	Senior Trading Standards Officer		
Hertfordshire County Council	Sophie Lawrence	Prevent Programme Manager		



THREE RIVERS
Community Safety Partnership

Anti-social Behaviour Action Group

Agency / department	Representative name	Position / job title	Signature	Date
Homegroup	Mel Talbot	Housing Manager		
Paradigm Housing	James Montgomery-Heffernan	Housing Officer		
Watford & Three Rivers Intensive Family Support Team	Debbie Stone	Team Manager		
Sanctuary Housing	Hayley Trott	Housing Officer		
Origin Housing	Jessica Palmer	Neighbourhood Manager		
Beacon	John Fallows	Beacon Support Worker		
Places for people	Liam Rossiter	Place Manager		
Peabody Housing	Nneka Prince-Mgbemena	Community Safety Specialist		
NHS	Steve McConnon	Safeguarding Manager & Community Mental Health Nurse		
Emerging Futures	Stuart South	Outreach worker		
Sovereign Network group	Lisa Makowski	Neighbourhood Officer		

Youth Action Panel

Agency / department	Representative name	Position / job title	Signature	Date
South West Herts Partnership	Dave Bell	Family Support Manager		
West Herts College	Gareth Styles	Head of Foundation Studies		
HCC Turnaround Project	Georgia Servis	Turnaround Intervention Worker		



THREE RIVERS
Community Safety Partnership

Watford Borough Council	Glen Channer	Corporate Safeguarding Manager		
Hertsmere Borough Council	Holly Wilson	Community Safety Intervention Officer		
Hertfordshire County Council Specialist Adolescent Services Hertfordshire	Meera Parmar	Specialist Adolescent Services Hertfordshire Practice manager		
No More Service	Melissa Cucos	Interim Complex Needs Operational Manager		
Chessbrook	Naomi Lessiter	Safeguarding & Attendance Officer		
Welwyn, Hatfield & Hertsmere Intensive Family Support Team	Ruth Coleman	Team Manager		
Croxley Danes School	Winston Carnegie	Student Welfare/ Deputy Designated Safeguarding Lead		