

Institution: University of Stirling		
Unit of Assessment: 17. Business and Management Studies		
Title of case study: Creating a National Surveillance Camera Strategy to ensure transparency and responsibility in surveillance camera use		
Period when the underpinning research was undertaken: 2004-2019		
Details of staff conducting the underpinning research from the submitting unit:		
Name(s):	Role(s) (e.g. job title):	Period(s) employed by submitting HEI:
C. William R. Webster	Professor	2000 - Present
Period when the claimed impact occurred: March 2017 – December 2020		
Is this case study continued from a case study submitted in 2014? No		
<p>1. Summary of the impact</p> <p>Stirling research into the use and regulation of surveillance cameras has been pivotal in the creation of the Surveillance Camera Commissioner's landmark National Surveillance Camera Strategy for England and Wales (Impact 1). This world-first strategy creates and ensures regulatory and service oversight of all public surveillance cameras in England and Wales, laying out how cameras must be managed and used, including so that they comply with data protection and other relevant legislation. Stirling has further led on designing, implementing and evaluating the critical Civic Engagement strand of the strategy (Impact 2); this ensures that the public and civil society organisations have a strong voice in: the surveillance debate, in shaping the future development of the National Strategy, in how publicly-owned surveillance cameras are used, and in ensuring the management of surveillance cameras includes engagement mechanisms.</p>		
<p>2. Underpinning research</p> <p>Working within the Centre for Research into Information, Surveillance and Privacy (CRISP) at the University of Stirling, William Webster's research into technologically mediated surveillance, conducted over 20 years, has argued that because new forms of digital surveillance are opaque in practice, it is important that appropriate governance and management mechanisms are established, that there is a healthy public discourse about the purpose and consequences of surveillance systems, and that they are transparent in how they are designed and used. The research argues this is essential for effective governance, especially in relation to accountability, public trust and support (R1, R2). This has become increasingly important with the growth of new digital forms of surveillance, such as automated facial recognition, Smart CCTV and body-worn video cameras, where the data processes are largely invisible to those being surveyed. As the 2017/18 annual report by the Surveillance Camera Commissioner states, "the most recent estimates for the total spend (in England and Wales) on video surveillance cameras was £2.25 billion. We are seeing the increasing use of automatic facial recognition (AFR), unmanned aerial vehicles (UAVs), automatic number plate recognition (ANPR) and body worn video cameras (BWVs)" (http://stir.ac.uk/4yo).</p> <p>The rise in the number of video surveillance cameras, their increasing technological sophistication, and associated governance mechanisms has been a core area of Webster's research. Webster's early research on surveillance cameras (initially referred to as Closed Circuit Television or CCTV) pointed to the co-evolution and diffusion of technology, public policy and governance, and the pressing need for effective regulatory and management mechanisms beyond the basic provisions in the Data Protection Act to ensure that such systems were delivered legally and in the public interest (R1, R2). This line of argument is reflected in the formation of the Office of the Surveillance Camera Commissioner following the Protection of Freedoms Act in 2012 and the subsequent creation of the National Strategy. R1 and R2 argue that this emerging regulatory environment should include managerial and political oversight and accountability mechanisms, guidance about best practice and the ethical use of surveillance cameras, as well as the risks associated with the lack of governance mechanisms (R3). This research is directly related to Webster's work for the Surveillance Camera Commissioner and is now fully embedded in the National Strategy. In addition to the importance of establishing governance mechanisms, the research has argued that the unique properties of surveillance cameras (opaque digital processes which shape human behaviour) mean that their use and governance requires a full public discourse, so that those charged with setting the rules about their use know what is acceptable to society and what is not (R1, R2). Developing from this the research concludes that the governance of surveillance</p>		

cameras must go beyond operational matters and incorporate robust managerial systems, public consultation and engagement, privacy mechanisms, codes of practice, as well as concrete measures to facilitate national discourse and debate, as this is essential in order to maintain trust in service providers and the technology (R2). All these aspects are now fully embedded in the National Strategy.

The above described research, which has directly underpinned the formation and shaping of the National Surveillance Camera Strategy for England and Wales, is also supplemented by the pan-European LiSS research programme (F1., PI: Webster). This assessed the importance of regulatory instruments in a technologically fast-moving policy environment and called for national guidelines and codes of practice, this is directly related to the governance of surveillance cameras in R4 and also in the content and regulatory approach adopted in the National Strategy. The EU-funded IRISS project (F2., PI: Webster) examined the relationship between surveillance and democracy and included ANPR as one of its core case study areas (R5). This research highlighted the circumstances under which surveillance becomes controversial and contested, and emphasised the linkage between public discourse, engagement and democratic legitimacy. This points to the importance of public engagement, which is now embedded in the Civil Engagement strand of the National Strategy. The ESRC-funded SmartGov (F3., PI: Webster) project examined innovative governance and public participation mechanisms in smart city settings and found that new innovative technological service solutions, like smart CCTV, were being developed alongside new digitally mediated participatory practices (R6). This is directly relevant to the National Strategy which is designed to govern technologies utilising artificial intelligence as well as public engagement utilising new social media techniques.

3. References to the research

- R1.** Webster CWR (2004) The Diffusion, Regulation and Governance of Closed-Circuit Television in the UK. *Surveillance and Society*, 2 (2/3), pp. 230-250. <http://stir.ac.uk/4z6>
- R2.** Webster CWR (2009) CCTV policy in the UK: Reconsidering the evidence base. *Surveillance and Society*, 6 (1), pp. 10-22. <http://stir.ac.uk/4z9>
- R3.** Murakami Wood D & Webster CWR (2009) Living in Surveillance Societies: The Normalisation of Surveillance in Europe and the Threat of Britain's Bad Example, *Journal of Contemporary European Research*, 5 (2) pp. 259-273, 2009. Available at: <https://www.jcer.net/index.php/jcer/article/view/159>
- R4.** Webster CWR, Töpfer E, Klauser F & Raab C (eds.) (2011/2) Revisiting the Surveillance Camera Revolution: Issues of Governance and Public Policy. *Information Polity*, Part 1: 16 (4) pp 297-398 2011; DOI: [10.3233/IP-2011-0262](https://doi.org/10.3233/IP-2011-0262) Part 2: 17 (1) pp 1-6 2012. DOI: [10.3233/IP-2012-0265](https://doi.org/10.3233/IP-2012-0265)
- R5.** Ball K & Webster, CWR (eds) (2019) *Surveillance and Democracy in Europe*. Routledge Studies in Surveillance, Routledge. DOI: [10.4324/9781315638355](https://doi.org/10.4324/9781315638355) (154 page peer-reviewed edited volume, 3 chapters co-authored by Webster.)
- R6.** Leleux C & Webster CWR (2018) Delivering Smart Governance in a Future City: The Case of Glasgow. *Media and Communication*, 6 (14) pp 163–174. DOI: [10.17645/mac.v6i4.1639](https://doi.org/10.17645/mac.v6i4.1639)

Funding:

- F1.** Living in Surveillance Societies (LiSS) (2009-2013). GBP321,490 (European Commission, COST). PI: Webster.
- F2.** Increasing resilience in surveillance societies (IRISS) (2012-2015). GBP223,298 (European Commission, Framework Programme 7). PI: Webster.
- F3.** Smart Governance of Sustainable Cities (SmartGov) (2015-2019). GBP278,009 (ESRC, ES/N011473/1). PI: Webster.

4. Details of the impact

Impact 1 – The creation of a National Strategy governing surveillance camera use

Webster's research has been fundamental to the development, implementation and evaluation of the first-ever National [Strategy](#) (launched March 2017) for surveillance cameras (S1). The 'National surveillance camera strategy for England and Wales' governs the use and management of public space surveillance cameras, providing oversight of surveillance camera use, sets out the principles of use, and in doing so determines how cameras are managed and used. The Strategy is implemented by the Office of The Surveillance Camera Commissioner (SCC). Impact was delivered through collaboration (2015 onwards) on public policy issues associated with the SCC

via Webster's membership of the SCC's strategy group responsible for the design and implementation of the National Strategy. The SCC, which became a statutory position in 2012 (Protection of Freedoms Act), was established to provide regulation and oversight of overt surveillance camera activities in England and Wales and to protect wider, privacy rights through a variety of policy instruments. The National Strategy guides the responsible management of surveillance through its Surveillance Camera Code of Practice. Before the SCC was established there was no technology specific national oversight of surveillance camera use in the UK, and no national strategy to govern the technology until 2017. The National Strategy covers more than 600 public authorities and an even larger number of private and commercial organisations, including private security firms and retailers. Recognising Webster's input to the strategy, Tony Porter, Surveillance Camera Commissioner states:

"I would like to express my thanks to you for informing key parts of this vital work. I consider your contribution to have taken several forms with regard to both specific interventions and more generally informing the overall approach of my Office towards the national oversight of surveillance practices." (S2)

The collaboration and subsequent impact depended on the insights established in the research (R1, R2) that highlight the importance of public awareness as a key factor in gauging the levels and types of surveillance that are acceptable to society. A second source of insights refer to the ethical use of contemporary surveillance practices, and, the importance of designing governance and management processes that engage a range of stakeholders (R1, R2).

Systematic collaboration began with the Surveillance Commissioner giving the Annual CRISP, Lecture in 2015. This led to the first impact, to make a major contribution to the formation and development of the first **National Surveillance Camera Strategy for England and Wales (S1)**, with Porter stating that "Your input into all elements of the Strategy was invaluable" (S2).

Tony Gleason, Chair of the Public CCTV Managers Association (representing more than 200 local authorities on surveillance camera use) and local authority lead on the Surveillance Camera Commissioner's National Surveillance Camera Strategy expert working group, also confirmed the importance of Webster's research and input into the creation of the National Strategy and consequently the management of public space camera systems:

"Your academic expertise in public policy, technology and surveillance, governance, oversight, stakeholder and public engagement, and your work with the Centre for Research into Information Surveillance and Privacy (CRISP), has significantly informed and shaped the development of this Strategy, and subsequently the provision of all public space surveillance cameras in the UK." (S3)

As a result of this input into the National Strategy it is now the case that all public space surveillance camera systems in England and Wales must demonstrate appropriate managerial control, public support and trust in their existence and operation. It is a legal obligation for named authorities to follow the principles and practices laid out in the National Strategy. This ensures providers follow best practice and operate systems with appropriate governance structures in place. As Gleason states, "The Strategy has been invaluable to local authorities, guiding our responsible development and deployment of new and existing camera systems (S3)." Sharon Colley, who as the National Capabilities Manager for CCTV for the National Police Chief's Council's (NPCC) Specialist Capabilities Programme plays a leading role in determining how surveillance cameras are governed and used within police settings, confirms that the National Strategy,

"has had a major impact on public policy in this area, and consequently on the police use of surveillance cameras. The NPCC has responded to the Strategy by not only working towards the SCC Kite Mark of strategy, but also by forming a National CCTV Working Group to review the way police and law enforcement agencies process CCTV, this has resulted in changes to both procedures and training, including those relating to public engagement." (S4)

Colley further confirms the invaluable input of Webster's research into creating the National Strategy:

"In my opinion, it is fair to say that the public policy landscape surrounding the governance of surveillance cameras has been directly impacted by your research and your

involvement in the National Surveillance Camera Strategy. This in turn, has directly influenced the provision of surveillance cameras by policing agencies in the UK, especially in relation to the regulatory requirement to engage citizens about CCTV provision, for police forces to facilitate public awareness of their systems, and to make sure accountability and oversight mechanisms are in place.” (S4)

Impact 2 – Leading and delivering the critical ‘civic engagement’ strand of the National Strategy to embed public awareness and transparency

The success of the National Strategy and the responsible use of surveillance cameras has and continues to depend on surveillance camera operators engaging with the public about their use of surveillance. Webster’s research (R1, R2) was vital to ensuring that this engagement between CCTV users and the public was enshrined in the National Strategy and is now an auditable managerial requirement of all public space systems. As Colley states:

“...in your research you have argued that governance and accountability structures, as well as public awareness and transparency, are key elements for securing public support for the use of surveillance cameras in society. This perspective is critical for policing as surveillance has to be undertaken in the public interest and in accordance with democratically agreed principles and practices.” (S4)

Webster was able to enshrine these ideas of public awareness and transparency as core principles for ensuring responsible surveillance camera use by his leadership of the ‘civic engagement’ strand of the National Strategy (S7a). As Porter states: “you took leadership and responsibility for drafting and developing the Civic Engagement ‘strand’ of the strategy, and associated activities and deliverables” (S2). He further commented that the civic engagement strand is “crucial in ensuring that the use of surveillance cameras is debated and to encourage organisations to be transparent about why and how they are using surveillance cameras” (S7a, p.8). Gleason also confirms the importance of Webster’s leadership:

“Your leadership of the Civic Engagement element of the National Strategy, informed by your expertise in the governance of surveillance cameras has ensured that issues relating to public and stakeholder engagement and public discourse are fully enshrined in all aspects of the Strategy, and as such your input has had a lasting legacy on public policy in this area.” (S3)

To facilitate the direct implementation of these principles into the practice of surveillance camera use, Webster led and created the SCC’s programme of civic engagement, which constitutes the major element for fulfilling the SCC’s National Strategies Objective 3: “Objective 3 - Make information freely available to the public about the operation of surveillance camera systems” (S7). The impact and successful completion of the outputs, activities, and measures of this strand are reported to and recognised by Parliament (recorded in Hansard) annually, for example in 2017, 2018, and 2019 (S5).

As part of this civic engagement programme, in 2016, Webster organised and hosted a consultation event on the National Strategy in London, drawing in key stakeholders across the sector. A further key event involved hosting a public ‘Question Time’ event on the Future of Surveillance Cameras (S5a, p.22) in which key stakeholders in the field of surveillance cameras and data protection, such as the Chief Constable of Durham Constabulary and Lord Brian Paddick, engaged in debate with the public (S7b). The SCC confirm that these civic engagement activities are a core element of the National Strategy, derived from the obvious challenges that surveillance technology poses to civil liberties and data protection:

“Professor Webster’s involvement in this approach [civic engagement strand] has been crucial. At a time where new technologies are increasing exponentially, their capabilities are little understood by the public at large and their impact on society yet to be determined, the requirement to involve the public in any debate about their usage is seen as paramount. ... These are exactly the types of debate [i.e. Question Time event] we need to see more of and provide to the public if the notion of ‘surveillance by consent’ is to retain any sort of legitimacy.” (S5a, p.22-23).

Together with the importance of civic engagement in the surveillance debate, an outcome of this was further refinement to the National Strategy and associated strand deliverables.

Further critical impact came with Webster's invention and leadership of the Surveillance Camera Day, which took place for the first time in June 2019 (**S7c**). This national event, which was a world first, was designed to raise public awareness about the use of surveillance cameras, which in turn could be used to inform guidance and policy. As such, the generation of media exposure and resulting debate was critical. This was achieved by coverage in *The Times* and *The Telegraph*, and Porter's appearance on Radio 5's Live breakfast show, and the day was covered on BBC2's *The Politics Show*, and generated over 95,000 impressions on Twitter (**S5b**, p.18). Webster's accompanying article on *The Conversation* received over 80,000 hits (**S6**). As Porter states:

"The Surveillance Camera Day was a huge success and succeeded in generating a national conversation about surveillance cameras... By drawing attention to these developments, the Surveillance Camera Day has informed the development of new policy positions... for example my guidance for 'Police Use of Automated Facial Recognition Technology.'" (**S2**)

The Surveillance Camera Day was important for changing the practices and mindsets of local authorities and police forces toward openness and public consultation. As Gleason states:

"For local authorities, this event underlined our need to provide citizens with information about surveillance cameras, transparency in how they are used, and the importance of openness in securing public trust. At Bournemouth, Christchurch and Poole Council, for example, we participated in the 'Doors Open' element of Surveillance Camera Day and through which we invited members of the public to observe our CCTV control room and to learn more about how we used surveillance cameras in the area. This was an important initiative in providing transparency and generating public trust." (**S3**)

North Wales, Gloucestershire and Surrey Police Constabularies also participated in the 'Doors Open' initiative of the Surveillance Camera Day, also reinforcing the need for transparency in camera use for police forces (**S4**, **S7C**). Following on from Surveillance Camera Day, Webster organized an expert panel of the CPDP (Computers, Privacy and Data Protection) Conference in Brussels in January 2020 on the governance of face recognition surveillance cameras. This helped to extend policy discourses in the area to a wider group of international stakeholders.

To summarise the impact, Porter writes that:

"Principles embedded in the use of surveillance cameras as a result of your input include proportionally, ethics, fairness, credible oversight and accountability, the recognition of fundamental human rights, and mechanisms for public scrutiny and engagement." (**S2**)

Webster's essential contributions to the first-ever National surveillance camera strategy have therefore ensured that the governance and use of surveillance cameras in England and Wales is now more transparent, accountable, and ultimately in the public interest.

5. Sources to corroborate the impact

S1. National Surveillance Camera Strategy for England and Wales: <http://stir.ac.uk/4yu>

S2. Testimonial from Tony Porter, Surveillance Camera Commissioner.

S3. Testimonial from Tony Gleason, Chair of the Public CCTV Managers Association, Local Government Association representative on the National Police Chiefs' Council CCTV Working Group, Local Authority Lead on Surveillance Camera Commissioner's National Surveillance Camera Strategy expert working group, and CCTV Manager at Bournemouth, Christchurch and Poole Council.

S4. Testimonial from Sharon Colley, National Capabilities Manager – CCTV Specialist Capabilities Programme, National Police Chiefs' Council.

S5. Surveillance Camera Commissioner Annual reports: **S5a.** 2017/18 <http://stir.ac.uk/4yo> & **S5b.** 2018/19 <http://stir.ac.uk/4yx> & **S5c.** 2019/20 <http://stir.ac.uk/5g6> & **S5d.** Hansard References: <http://stir.ac.uk/5g9> & <http://stir.ac.uk/5gf> & <http://stir.ac.uk/5gc>

S6. William Webster, 'Surveillance cameras will soon be unrecognisable – time for an urgent public conversation', *The Conversation*, June 18 2019: <http://stir.ac.uk/4z0>

S7. Surveillance Camera Commissioner, Civic Engagement Strand of the National Strategy: **S7a.** Plan and launch (including citations of Webster's leadership) <http://stir.ac.uk/5ql> , <http://stir.ac.uk/5go> , <http://stir.ac.uk/4z3>; **S7b.** Question Time Event coverage

<http://stir.ac.uk/5qr> ; **S7c.** National Surveillance Camera Day and Open Doors Day coverage <http://stir.ac.uk/5qu> , <http://stir.ac.uk/5qx> , <http://stir.ac.uk/5h0>.