FAIRER WESTMINSTER

City of Westminster

Appendix C

Traffic Enforcement Cameras



CCTV POLICY
2025

This appendix is to be read in conjunction with Westminster City Council's overall policy and will outline the additional considerations and policies that would apply specifically to Traffic Enforcement Cameras managed by WCC.

Since 2005, the Westminster City Council has enforced moving traffic contraventions (MTC) using CCTV under powers bestowed by the London Local Authorities & Transport for London Act 2003. While on-street Civil Enforcement Officers (referred to as Marshals in the City of Westminster) provide essential enforcement, cameras serve as the only effective means to deter drivers from performing dangerous manoeuvres that compromise road safety, exacerbate congestion, and pose risks to other road users.

1. Purpose and Objectives

1.1. Traffic Enforcement Cameras (TEC) managed by Westminster City Council (WCC) are deployed to ensure compliance with traffic management regulations and improve road safety.

1.2. The key purposes of these systems are to complements the on-street operation of marshals and manage the road network to secure the expeditious movement of traffic and pedestrians and therefore, deter unsafe driving behaviours, reduce congestion and ensure the safe and efficient operation of the road network.

2. Deployment Protocol

2.1. Traffic enforcement cameras are deployed where there is evidence of non-compliance with traffic regulations that cannot be adequately addressed through other means. Deployment is based on necessity, proportionality, and the potential to meet operational needs effectively.

2.2. Within Parking, enforcement currently focuses on moving traffic contraventions. However, there is scope to extend enforcement to include stopping on school keep clear markings and bus stop/clearways, subject to operational feasibility and policy alignment.

2.3. Fixed CCTV cameras are used to monitor specific locations where low levels of compliance with moving traffic regulations have been identified.

2.4. Fixed Cameras deployment process:

a. Undertake monitoring period using a basic camera to gather evidence of non-compliance with traffic regulations.

b. Perform a site visit to assess existing signage and identify suitable lamp columns or infrastructure for camera installation.

c. Obtain Approval from the Governance Group

d. Install Cameras with Signage.

3. School Streets Programme

3.1. The School Streets Programme, run by WCC, uses cameras at some locations to enforce vehicle restrictions outside school entrances during term time. These areas become special Pedestrian and Cycle Zones during school opening and closing hours, though times may vary depending on the location. Anyone vehicle that is not exempt and is detected by CCTV during the times of operation will be issued a Penalty Charge Notice (PCN).

3.2. Cameras are positioned to monitor only vehicle pathways, with footage secured to block views of residential properties. Road signage informs drivers about operation times and entry points. A list of locations and frequently asked questions is available here: www.westminster.gov.uk/school-streets

3.3. The unattended system employs the Videalert intelligent video analytics platform to identify potential offences, generating encrypted data packages at the point of capture. These are securely transmitted to the hosted system for review. The entire process is certified by the VCA for traffic offence enforcement.

3.4. Under this scheme, WCC acts as the data controller, while NSL, Conduent and Farthest Gate Limited serve as joint data processors.

4. Privacy and Data Protection

4.1. The Data Controller is Westminster City Council, which determines the purposes and manner of processing any personal data captured by traffic enforcement cameras.

4.2. All personal data captured must be processed in accordance with the Data Protection Act 2018 and GDPR principles and is retained only as long as necessary for enforcement or legal purposes, with retention periods as follows:

- Unprocessed footage: maximum of 15 days.
- Processed footage: where a Penalty Charge Notice has been issued is retained for a maximum of 6 months with the evidence packs being deleted once the evidence transfer to the City Council's PCN processing system is completed.

4.3. Additionally, in compliance with DVLA guidelines DVLA keeper information is redacted immediately upon PCN cancellation for incorrect Vehicle Registration Mark (VRM). For paid or cancelled PCNs, DVLA keeper information is redacted 6 months after PCN closure. The Council may request redaction on specific cases, which are then processed in the next scheduled batch run.

4.4. Traffic enforcement systems include features to ensure privacy, such as masking to exclude residential properties from view or blurring of individuals or vehicles not involved in contraventions.

5. Technical and Operational Specifications

5.1. Traffic enforcement systems use fixed, mobile, and unattended camera units, with no audio recording capabilities. Images and videos are encrypted at the point of capture and securely transmitted to a hosted system for review.

5.2. Approved operators' access and review footage through secure systems, ensuring compliance with operational protocols and data security standards.

6. Signage and Public Awareness

6.1. Clear signage is displayed in all areas under surveillance, indicating, presence of traffic enforcement cameras, the purpose of their use and that they are operated by WCC.

6.2. Privacy notices, list of locations enforced by WCC and further information on assets are published on the WCC website.

7. Governance and Responsibilities

7.1. Governance for traffic enforcement cameras is managed by the CCTV Governance Group, which ensures compliance with deployment protocols, privacy standards and operational effectiveness. All operators receive appropriate training and are subject to regular reviews to maintain competency and compliance with legal requirements.

7.2. The responsibilities include:

- Reviewing the necessity and effectiveness of deployments.
- Addressing resident and public complaints.
- Reporting to relevant stakeholders on system performance.

8. Data Access and Management

8.1. Access to footage is strictly controlled by the Traffic Enforcement Cameras Control Room Team Manager and, in their absence, authorized CCTV Control Room staff. Footage is retained solely for moving traffic enforcement purposes or to allow motorists to view footage of their Penalty Charge Notice (PCN) online.

8.2. Requests for footage, including Subject Access Requests (SARs), are processed in line with GDPR requirements. Individuals may submit SARs to access personal data under Article 15 of the General Data Protection Regulation (GDPR) 2018.

8.3. The procedure for making an SAR is detailed in the City Council's Fair Processing Notice, which is accessible online: www.westminster.gov.uk/fair-processing-notice
A completed SAR form is required to confirm the identity of the Data Subject, the authority of the requester (if acting on behalf of the Data Subject) and to assist in locating the relevant personal data. Requests can be submitted electronically or in hard copy and are acknowledged within five working days. The Council processes SARs within 30 calendar days, as specified by GDPR.

8.4. Disclosure of footage to third parties is limited to lawful purposes, such as assisting with law enforcement investigations or processing requests from authorized entities like solicitors. Third-party requests must be accompanied by a completed request form, available for download from the Council's CCTV webpage:
www.westminster.gov.uk/fair-processing-notice

8.5. Before footage is transmitted from the Videalert Camera Management System to the Si-Dem PCN processing system, redaction is performed to ensure no facial recognition or other identifying information is available in the images.