

# Glasgow City Council Internal Audit Section

## Committee Summary

### Neighbourhoods, Regeneration and Sustainability Services – Waste Depots - CCTV Systems

## 1 Introduction

- 1.1 As part of the agreed Internal Audit plan, we have carried out a review of the arrangements in place at Household Waste Recycling Depots following the installation of Closed Circuit Television (CCTV) with Automated Number Plate Recognition (ANPR) systems.
  - 1.2 In order to identify and reduce misuse of Household Waste Recycling Depots, CCTV systems including cameras with ANPR technology, have been deployed at Dawsholm, Polmadie, Queenslie and Shieldhall depots.
  - 1.3 The purpose of the audit was to review the implementation of the new system and gain assurance that data is appropriately gathered, used and managed. The scope of the audit included:
    - Documented processes and procedures.
    - Staff training and awareness.
    - The maintenance of suitable audit trails.
    - The management, storage and security of records.
    - Reporting from the system to ensure it is accurate and used appropriately.
- Reviewing the arrangements in place for enforcement action.

### Item 6 (m)

18th September 2024

## 2 Audit Opinion

- 2.1 Based on the audit work carried out a reasonable level of assurance can be placed upon the control environment. The audit has identified some scope for improvement in the existing arrangements and two recommendations which management should address.

## 3 Main Findings

- 3.1 Some of the key controls are in place and generally operating effectively. Information Security is included within the service risk register and is subject to appropriate reporting arrangements. A limited number of staff have Information Security responsibilities in relation to the systems and were aware of their roles and responsibilities.
- 3.2 All requests for access to CCTV footage are centralised through the Information and Data Protection Team and a clear process is in place for managing these requests. Third parties do not have direct access to CCTV footage. Measures are in place to spread awareness of the GCC Information Security Policy at the Household Waste Recycling Depots and staff are able to locate the guidance if required.
- 3.3 The ANPR system reads the number plates of vehicles visiting the Household Waste Recycling Depots from images taken by the CCTV system. Access to these records and the retention of the images is suitably controlled. The retention periods for ANPR and CCTV data are aligned with the Council's Records Retention and Disposal Schedule.
- 3.4 Weekly reports are extracted from the ANPR system which allows the Performance and Information Unit to identify frequent users of each of the four Household Waste Recycling Depots, as well as monitor general usage trends across the depots. These reports are cascaded to staff on site to allow them to identify and challenge possible misuse of the sites by users.
- 3.5 However, we noted that there are some areas where action is required. We were advised that there are no procedures or guidance currently in place for staff involved with both the operation of Waste Depots CCTV systems and management of CCTV footage.
- 3.6 Where required, CCTV footage is extracted from the system using a USB drive. We were advised that due to incompatibility between the CCTV system and the encryption software on USB drives, an unencrypted USB drive is required to be used. No risk mitigations, such as maintaining a log of each transfer of data, are currently in place.
- 3.7 An action plan is provided at section four outlining our observations, risks and recommendations. We have made

two recommendations for improvement. The priority of each recommendation is:

Priority	Definition	Total
<b>High</b>	Key controls absent, not being operated as designed or could be improved. Urgent attention required.	1
<b>Medium</b>	Less critically important controls absent, not being operated as designed or could be improved.	1
<b>Low</b>	Lower level controls absent, not being operated as designed or could be improved.	0
<b>Service Improvement</b>	Opportunities for business improvement and/or efficiencies have been identified.	0

- 3.8 The audit has been undertaken in accordance with the Public Sector Internal Audit Standards.
- 3.9 We would like to thank officers involved in this audit for their cooperation and assistance.
- 3.10 It is recommended that the Head of Audit and Inspection submits a further report to Committee on the implementation of the actions contained in the attached Action Plan.

## 4 Action Plan

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Staff are aware of their Information Security responsibilities.				
1	<p>We were advised that there are no procedures or guidance currently in place for staff involved with both the operation of Waste Depots CCTV systems and management of CCTV footage.</p> <p>Effective procedures direct staff in good practice and can help to promote compliance with the various legislation which covers CCTV footage.</p> <p>A lack of appropriate procedures increases the risk that staff do not adhere to the requirements of relevant legislation.</p>	Management should ensure that appropriate procedures for the handling of Waste Depots CCTV footage are developed, approved and distributed to relevant staff.	Medium	<p><b>Response:</b></p> <p>Accepted. Appropriate procedures for the handling of Waste Depots CCTV footage will be developed and circulated upon approval.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Assistant Group Manager (Waste Management)</p> <p><b>Timescales for Implementation:</b></p> <p>30 November 2024</p>

No.	Observation and Risk	Recommendation	Priority	Management Response
<b>Key Control:</b> Public Space CCTV data is adequately protected.				
2	<p>When required, CCTV footage is extracted from the system using a USB drive. We were advised that due to incompatibility between the CCTV system and the encryption software on USB drives, an unencrypted USB drive is required to be used. No risk mitigations, such as maintaining a log of each transfer of data, are currently in place.</p> <p>The use of an unencrypted USB device as a means of transferring data increases the risk that, if lost, the data could be accessed by unauthorised individuals.</p>	Management must investigate encryption options for the secure the transfer of CCTV data. If a suitable solution cannot be found, appropriate measures should be introduced to minimise the risks from the use of an unencrypted device.	High	<p><b>Response:</b></p> <p>The responsible Officer stated below will be tasked with investigating encryption options for the secure transfer of CCTV data, failing which a CCTV download log will be introduced to minimise the risks from the use of an unencrypted device. This will be by amending the existing CCTV Recordings Viewing Log to incorporate a download log or creating a separate CCTV Download Log.</p> <p><b>Officer Responsible for Implementation:</b></p> <p>Assistant Group Manager (Waste Management)</p> <p><b>Timescales for Implementation:</b></p> <p>30 November 2024</p>