

CODE OF PRACTICE

For

CLOSED CIRCUIT TELEVISION SYSTEM



at

County Hall Complex, Trowbridge

July 2009
Version 5a

CONTENTS

Section	Page
1) BACKGROUND AND STATEMENT OF PURPOSE	3
2) APPLICABLE LEGISLATION	6
3) PURPOSE OF THIS CODE OF PRACTICE	6
4) DEVELOPMENT, REVIEW AND PUBLICATION	7
• Changes and Review	
• Publication	
• Complaints	
5) TERMS AND DEFINITIONS	7
• Data Controller / System Manager	
• CCTV Control Centre Manager	
• CCTV authorised operators	
6) EQUIPMENT AND OWNERSHIP	9
• Ownership/copyright issues	
7) INSTALLATION MANAGEMENT	10
• Staffing	
• Security and Access to Equipment	
• Data Access and Protection	
8) MANAGEMENT AND CONTROL OF RECORDED MATERIAL	12
• Access to Recorded Material	
• Use / Storage / Erasure of Recorded Material	
• Subject Data Access Requests	
• Providing Recorded Material with the Police	
9) USE OF RECORDED MATERIAL BY ENFORCING AGENCIES	14
10) COUNCIL USE OF RECORDED MATERIAL	15
11) DEALING WITH COMPLAINTS concerning the system	16
12) EVALUATION, MONITORING AND AUDIT OF SCHEME	17
<i>Appendix 1. Extracts from Section 7 and 8 of the Data Protection Act 1998</i>	
<i>Appendix 2. Standards for the Release of Data to third parties.</i>	
<i>Appendix 3. Regulation of Investigatory Powers Act, Guiding Principles.</i>	
<i>Appendix 4. Council RIPA Policy.</i>	

1 BACKGROUND AND STATEMENT OF PURPOSE

- 1.1 Following a decision and authorisation by Council it was agreed to install a Close Circuit camera system (CCTV) within the curtilage of the County Hall Complex, Trowbridge, with both internal and external cameras. This followed incidents of damage to property on the complex during unoccupied hours and thefts occurring within both external and internal areas.
- 1.2 The Installation will be operated and data produced managed to achieve the Stated Purposes only.

It will be operated and managed in accordance with relevant legislation, including:

- The Human Rights Act 1998 (HRA)
- The Data Protection Act 1998, (DPA)
- The Freedom of Information Act 2000, (FoIA)
- The Regulation of Investigatory Powers Act 2000. (RIPA).
- The Police and Criminal Evidence Act 1984
- The Private Security Industry Act 2001

And also in line with guidance given in the CCTV Code of Practice 2008, produced by The Information Commissioner's Office.

- 1.3 The system installed is primarily a passive monitoring / surveillance system. However several of the cameras do have the capacity to be directed/controlled. This will allow them to be used to follow subjects moving in certain areas of the curtilage when they are being used for real time monitoring during nightwatch duties. However, as the cameras are clearly identified with signs and the stated purposes of the system do not include covert surveillance, this means the system is not being used in a manner which would require authorisation under RIPA . Should the use be changed, the necessary alterations to this Code of Practice will need to include authorisation procedures for RIPA.

Statement of Purpose

- 1.4 The primary purpose of the installed system is to deter and detect criminal activity and maintain public order within the County Hall, Trowbridge curtilage.
- 1.5 The secondary purpose of the installation is to increase security by monitoring of activity within the County Hall, Trowbridge curtilage, both to the exterior and interior of the buildings.
- 1.6 The third purpose is to help prevent incidents of assault or abuse to council staff in reception areas and improve service to the public in the reception area.
- 1.7 The fourth purpose is to provide information, IF requested, in the form of video data recording on DVD to the Police for use as evidence in criminal prosecution proceedings, where the alleged criminal acts occurred within this site's curtilage.
- 1.8 These objectives will be achieved by:
- Collection and electronic storage of data, collected by Cameras in the system, for a specific period of time, after which period the data will automatically be destroyed.
 - Viewing of this recorded data, by authorised persons only to enable identification of persons within the range of any camera and within the County Hall curtilage in pursuit of these Stated Purposes only.

- Real time monitoring of the data from the cameras, by authorised, trained persons during specified hours. (predominantly unoccupied hours)
- Provision of data, from recordings, on transferable medium (DVD) to the Police, if requested, for use as evidence in criminal proceedings, where such relates to activities within the County Hall cartilage.
- Limited monitoring, as required, of a designated area as and when requested by the Police or other enforcing authority after authorisation by CLT.

Statement of Principle

Fair and Lawful

- 1.9 This CCTV System will be operated fairly within all applicable laws, and only for the purposes stated in this Code of Practice.
- 1.10 Any intended use of the data for ANY other use can ONLY be authorised by a designated Council RIPA Authorising Officer or, where the intended use is for covert surveillance by the Police force, written confirmation is needed from the Police that RIPA authorisation has been granted from an authorised person(see Council RIPA Policy).
Any such extension of its use must, after such authorisation, be written into this Code of Practice, which, as a Council document is to be made available on request, in accordance with the requirements of the Freedom of Information Act.

Privacy of Individuals

- 1.11 The CCTV system is intended to view and monitor activity within the County Hall, Trowbridge curtilage only. The area of coverage reflects this. Cameras are either fixed, or in certain cases, can scan an area.
They do NOT focus on homes or other private areas. Where such areas are within the focus area of a particular camera, technical means will be used to render images of such areas unviewable.
- 1.12 If a decision is made to view or retrieve data recorded of any particular individual, group of people or property then it must be for a justifiable cause and this can only be conducted in accordance with all relevant legislative requirements.
- 1.13 Covert Surveillance is NOT within the stated purposes of the Installation and as such can ONLY be undertaken after the necessary authorisations required under the Regulation of Investigatory Powers Act 2000 and this Code of Practice have been obtained.
In cases where a request for directed surveillance is made from within the Council, or non Police law enforcement agencies, it will be necessary to follow the procedures given in the Council's RIPA Policy to obtain authorisation from a Council RIPA Authorising Officer. It will also be necessary to revise this Code of Practice, which requires authorisation by CLT.
In cases where a request for Overt or Covert surveillance is made by the Police, the System Manager will need to obtain authorisation from CLT for the necessary alterations to this Code of Practice and written confirmation from the Police that RIPA Authorisation has been granted for the operation of which the use of the system cameras is to form a part.
In all cases records of such requests and the related details as specified in the Council's RIPA Policy should be supplied by the System Manager for inclusion in the

Council's Central Register held by the Solicitor to the Council, as detailed in the Council's RIPA Policy. (see *Appendix 4*).

Effectiveness

- 1.14 Every effort has been made in the planning and design of the CCTV System to provide maximum effectiveness within the specified area of coverage. It is not possible to guarantee that the CCTV System will see or provide evidence of every incident which takes place within that area.

Openness

- 1.15 In accordance with the ICO CCTV Code of Practice 2008, Signs are installed in and around the areas covered by the CCTV System, which identify the system owner as Wiltshire Council, together with a contact telephone number.
The intention of the signs is to publicise the presence of the CCTV system therefore ensuring that it is an overt rather than covert system.
Smaller signs supplement the above within the area of coverage. The placing of such signs is an important aspect of the principles of The Data Protection Act 1998.
- 1.16 Dummy cameras will not be used within this System.
- 1.17 Data Subject Access Requests will be handled promptly and effectively, and in accordance with the ICO CCTV Code of Practice 2008, and in compliance with the Freedom of Information Act 2000 and the Data Protection Act 1998.

2 APPLICABLE LEGISLATION

2.1 The following legislation is relevant to the CCTV Installation and its operation.

- Human Rights Act 1998
- Data Protection Act 1998
- Freedom of Information Act 2000
- Regulation of Investigatory Powers Act 2000
- Private Security Industry Act 2001

Additional information and guidance is given in:

- CCTV Code of Practice 2008, produced by Information Commissioner's Office
- Guidance Note 2004, produced by the Information Commissioner's Office
- Local Government Information Unit Guidance, 1996

This Code of Practice and all operating procedures have been written to comply with the legislative requirements contained within the above stated Acts and in line with the listed Codes of Practice and Guidance, as far as reasonably practicable.

3 PURPOSE OF THIS CODE OF PRACTICE

3.1 This Code of Practice is intended to set out standards and procedures for the management, operation and use of the Closed Circuit Television (CCTV) System installed on the County Hall, Trowbridge curtilage under the control of Wiltshire Council, as the Owner of the system.

3.2 Wiltshire Council and its employees and contractors remain bound by this Code of Practice and any subsequent amendments thereto. Amendments should reflect the principles and objectives of the Code and be authorised only by the Corporate Leadership Team.

3.3 The CCTV system is managed by the System Manager who is employed by Wiltshire Council. The System Manager has responsibility for compliance with the stated purposes and the security of the CCTV System.

3.4 It is the responsibility of the System Manager to ensure Procedures are put into practice to achieve the stated purposes of the system and comply with relevant Council policies (e.g. RIPA Policy).

4 DEVELOPMENT, REVIEW AND PUBLICATION

- 4.1 This Code of Practice will be subject to review every 3 years, as a minimum and an annual report will be produced by the System Manager on the system and its operation for the CLT.
- 4.2 All changes within the CCTV System, or operating procedures, of whatever type, must be agreed by the System Manager, and a recorded note made of such. Any change which requires an alteration to the Code of Practice, will only be implemented after authorisation by the CLT.

Publication

- 4.3 This Code of Practice is accessible to the Public and will be displayed on Wiltshire Council's Website.
- 4.4 A charge may be made for issuing paper copies of the Code and all data provided following a request made under the FOIA.

5 TERMS AND DEFINITIONS

5.1 Owner

Wiltshire Council is the Owner of this system and as such has direct responsibility for the implementation of the policies, purposes and methods of control of the system.

5.2 System Manager

The person designated, trained and authorised as having direct responsibility for the implementation of the policies, purposes and methods of control of the CCTV system. Additionally only the System Manager only or nominated deputy may create copies of data, on transferable medium, from that data stored electronically within the system. This in the form of DVD of a period of time of a recording made by a camera/s which form part of the system, or the provision of still photographs created from stored images.

For the names of the person holding this post for this CCTV system, see the Operating Procedures Manual.

5.3 CCTV Control Centre Manager

The Council Officer, or designated contractor, with management responsibility for the areas in which a control centre is located, and to whom operators within that area are accountable. Such managers are trained and authorised by the Owner of the System to ensure that at all times the CCTV System is operated in accordance with the Code of Practice and any procedural instruction issued by the System Manager. For the names of persons holding these posts for this CCTV system, see the Operating Procedures Manual.

5.4 CCTV Authorised Operator

Any person permitted to operate the cameras within the CCTV system and monitor the output from the cameras, following suitable training and signing of the necessary confidentiality declaration in relation to all material viewed from the system. For the names of persons holding these posts for this CCTV system, see the Operating Procedures Manual.

5.5 CCTV Control Centre

The secure area or room where CCTV data is recorded, stored and retrieved.
The controlled area where real time monitoring of the camera data (viewed on monitor screens) may be undertaken.

5.6 CCTV System

The totality of arrangements for closed circuit television within the Council's Byethesea Road, Trowbridge curtilage including, but not limited to, the CCTV equipment, computer system hardware, software, staff and operational procedures.

5.7 CCTV Equipment

The surveillance items comprising cameras and associated equipment for monitoring, storage, transmission, copying and controlling purposes, for use in the system.

5.8 Auditor

Any person authorised by the System Manager to carry out inspections of the CCTV System management, procedures and operation in order to ensure compliance with all relevant codes, instructions and legislation.

5.9 Incident

An activity that raises concern that a criminal offence or trespass leading to damage of property has been, is being or is about to be, committed, within the County Hall, Trowbridge curtilage,

OR

an occurrence which has been reported to the System Manager as having taken place, which warrants action in pursuance of the stated purposes of the system.

OR

a request, by an authorised member of the Wiltshire Constabulary to monitor specific events or activity, which is in accordance with the stated purposes of the scheme.

5.10 Master Copy

The first copy taken of any part of the electronically recorded material stored on the system and recorded onto a transferable medium. (e.g. DVD).

5.11 Retrieval System

That part of the CCTV system having the capability, using any medium, of effectively capturing data that can later be retrieved, viewed or processed.

5.12 Recorded Material

Any data recorded on any medium that has the capacity to store data and from which data can later be recalled irrespective of time.

6 EQUIPMENT AND OWNERSHIP

6.1 The CCTV System equipment is owned and operated by Wiltshire Council.

Ownership/Copyright Issues

6.2 All hardware and software in the CCTV system and Control Centres is owned by Wiltshire Council.
The intellectual copyright of all stored data, whether viewed or unviewed, within the system is retained by Wiltshire Council, who also retain the right to control the use of any material retrieved from the system and recorded onto transferable medium, and any copies made from such a master copy.

7 INSTALLATION MANAGEMENT

Staffing

7.1 All CCTV cameras within this system will only be controlled and monitored at either:

- the CCTV Control Centre.
- the Customer Care Centre,
- the System Manager's PC.

The cameras will only be controlled from the CCTV Control Centre.

The only cameras which may be monitored from the Customer Care Centre are those located within the main reception area.

All of these are located within the Mech building.

7.2 All CCTV Operators must be suitably trained and be capable of meeting service training requirements. Such training will include relevant information concerning the requirements of: the Human Rights Act 1998, the Data Protection Act 1998 and the Regulation of Investigatory Powers Act 2000.

7.3 All Authorised CCTV Operators employed in the CCTV Control Centre and all persons connected with the management of the system will be CRB checked and required to disclose past criminal convictions (and, if appointed, any further convictions) so the Council may decide whether the offence has a bearing on the appointment. Customer care staff, who may monitor ONLY the cameras within the reception area, are not designated as authorised Operators.

7.4 The normal supervisory and disciplinary procedures of Wiltshire Council will apply to all CCTV Operators (both authorised and non authorised), Centre Managers and all personnel involved in the management of the system to ensure compliance with their responsibilities in accordance with this Code.

7.5 All CCTV Managers, Operators and the System Manager will work in accordance with the Council's wider Policies, including its Equal Opportunities Policies.

Security and Access to Equipment.

7.6 The CCTV Control Centre will remain secure with access restricted to authorised persons only at all times that the system is operating and images being recorded by the cameras are viewable on monitor screens.

7.7 CCTV Control Centre Managers must satisfy themselves of the authority and identity of any person seeking access to the equipment or data held therein. In cases of doubt, access to either equipment or data will be prohibited and the matter reported to the System Manager.

7.8 The CCTV Control Centre Manager is responsible for the day-to-day management of the nominated CCTV Control Centre. The nominated manager is authorised to decide when access to the equipment or data within is to be permitted by authorised persons, in line with clause 7.7 above.

7.9 The System Manager is authorised to use discretion to permit access to any control centre or data held within the system by other persons with a bona fide reason for such access. e.g. contractors for repair and maintenance, authorised police officers.

- 7.10 A detailed log will be maintained in the CCTV Control Centre to record the names of all persons accessing the CCTV equipment, (for monitoring or other reason). The Customer Care Centre will record the names of any visitor who accesses the equipment, either for monitoring of persons in the reception area, which area is visible on the monitors sited within the Customer Care Centre, to service / repair equipment.
- 7.11 For any non routine monitoring undertaken details will also be recorded of the name of the person/s involved, the reason for their access and times of arrival and departure, in all centres.

Data Protection

- 7.12 This CCTV System is registered under The Data Protection Act 1998. The System Manager is the Council's Senior Facilities Officer for Administration Buildings.
- 7.13 All data will be processed in accordance with the purposes stated within this Code, and in compliance with the Data Protection Act 1998.
- 7.14 Any recorded material held in the CCTV System or copied onto transferable medium will be used only by the Council or the Police and then only in secure conditions and for the stated purposes as given in the current, authorised version of this Code of Practice

Subject Access Requests

- 7.15 Individuals may be allowed access to recorded material of themselves. (Subject to proof of their identity and sufficient information, such as exact times and location, to allow the recorded data to be located).
- 7.16 All such requests, which fall under the Data Protection Act 1998, should be put in writing and sent to the Corporate Information Team, who will manage and co-ordinate the response to the request, in line with the Council's Policy on handling of such Information requests.
- 7.17 The Corporate Information Team will, where necessary, discuss the request with the System Manager, and respond briefly describing the types of images which are recorded and retained and information about the disclosure policy. It will then be decided whether the request can and/or should be complied with.
- 7.18 The System Manager must ensure the necessary documentation for copying and release of any data copied from the system is completed, and retain a copy of such, for every instance where data is copied from the system onto transferable medium.
- 7.19 The Corporate Information Team will retain a record, together with reasons, for every instance of refusal to provide a copy or release any data from the system following such a request.
- 7.20 Any refusal of such a request for release of recorded information from the system must be reported to the Council's Data Controller and then the Corporate Leadership Team.

8 MANAGEMENT AND CONTROL OF RECORDED MATERIAL

Access to Recorded Material

- 8.1 Only the System Manager, or his/her nominated deputy may copy data stored electronically within the system onto transferable medium, creating a master copy DVD, or still photographs.
- 8.2 Further copies of a master copy, or still photographs made from a portion thereof, may only be made with the written permission of the System Manager.
- 8.3 Recorded material will be used only for the stated purposes defined in this Code of Practice. It should be of the quality required to satisfy evidential requirements and the Data Protection Act 1998.
- 8.4 Recorded material will not be sold or otherwise used for commercial purposes or the provision of entertainment.
- 8.5 Public showing of recorded material will only be allowed in compliance with Police needs connected with an investigation and only then in accordance with the Codes of Practice of The Police and Criminal Evidence Act 1984, or any other circumstance provided by law.
The required release document must clearly state the intended use and timescales. Any required editing out of irrelevant subject matter should be passed for approval to the System Manager, who will consult with the Corporate Information Team, as needed.
- 8.6 The recording system should be checked and maintained on a regular basis to ensure it is in good working order.

Use of Recorded Material

- 8.7 At the time of copying any data from that stored electronically within the system onto a transferable medium, creating a master copy, the System Manager or deputy must make a separate record of the information needed to enable identification of the camera, location, date and time that the data being copied was captured onto the system.
- 8.8 Additionally a copy shall be made and stored securely by the System Manager of any data released. This will be retained for a period of 6 years. This retained copy may be on hardcopy transferable media, or electronically, separately from the CCTV system.
- 8.9 Recorded material will only be released to duly authorised Police, other law enforcement agencies, Council staff and in accordance with the requirements of the Police and Criminal Evidence Act.
- 8.10 When such release of data is permitted, the details of the authorised person being provided with that data shall be recorded and their signature obtained verifying they will only use the data for the express purpose stated on their data access request, and in accordance with the stated purposes of the system.
- 8.11 It is the responsibility of the authorised recipient to return any such recording to the System Manager, or confirm it has been destroyed at the conclusion of any legal proceedings, where this has been ordered by the court.

Storage of Recorded Material

- 8.12 Any master copy or further copies made, as referred to earlier, will be stored securely in a designated location, until despatch to or collection by whichever authorised person requested the data, such request having been granted. It is the System Manager's responsibility to ensure this happens.

Erasure of Recorded Material

- 8.13 Digitally recorded material on the system will be stored electronically on a hard drive and will remain accessible for 5 days, after which it will automatically be overwritten.

Providing Recorded Material to the Police

- 8.14 When incidents observed during real time monitoring are highlighted by the CCTV operator/s to the Police for attention, the level of response will be decided by the Police, using their existing criteria for responding to calls for Police assistance.
- 8.15 Any such request must be noted by the CCTV Operator on the appropriate form to comply with the requirements of Section 29 of the Data Protection Act.

9 USE OF RECORDED MATERIAL BY ENFORCING AGENCIES

- 9.1 Under the stated purposes for the system in this Code of Practice the only Enforcing Authority who can and will be provided with data from the system are the Police. Should any other Enforcing Agency request information from the system or that the system be used for covert observation, this constitutes a change of stated purpose which will require a modification to this Code of Practice, following authorisation from CLT before any such request is granted. The requirements of RIPA, as laid down in the Council's RIPA policy, shall be observed at all times.
- 9.2 When the Police have reasonable cause to believe that an incident has been recorded which involves, or may involve, criminal activity, public disorder or antisocial behaviour, a duly authorised Police Officer may be provided with the recorded material by the System Manager, who will inform the Council's Data Controller. The necessary data release form will be completed and the recorded DVD signed for by the receiving Police Officer. The data release form will be retained by the System Controller, for a period of six years, along with the copy of the data released.
- 9.3 The handling and use of transferable data / DVD / still photographs will be carried out in compliance with relevant legislation, as identified in section 2 of this Code.
- 9.4 In the circumstances specified above, the recorded material will be released by the System Manager, but intellectual property rights to all data contained will remain with Wiltshire Council. The recorded material shall at no time be used for anything other than the purpose specified and identified when the recorded material is released by the System Manager to the Police.
- 9.5 Any recorded material released from the CCTV system to an enforcing agency will be dealt with in accordance with their own procedures and in compliance with all relevant statutory provisions.
- 9.6 Any recorded material from the system exhibited in Court as evidence must be the Master Copy of the recording. There must be no editing, either by cutting or splicing or recording from other sources. However, while the master of the recorded material is in the possession of an enforcing agency, they may take one working copy of the recorded material and a second copy of the recorded material to be used as disclosure material to the defence in any court proceedings. Written statements will be required from the enforcing agency officers as supporting evidence on copying and other handling of the recorded material.
- 9.7 Where recorded material is passed to the defence, in relation to court proceedings they will be required to sign a statement acknowledging that the information is subject to the Data Protection Act and that the intellectual property rights are owned by Wiltshire Council.
- 9.8 Wiltshire Council do not support the use of any recordings for 'entertainment programmes' and agree not to release them for this purpose.
- 9.9 The CCTV Control Centre Manager or the Operator in the Control Centre, who observed an incident during real time monitoring, and the person copying the data and creating a Master Copy, may be required to make statements in connection with court proceedings.
- 9.10 At the conclusion of the use of any recorded material supplied it is the responsibility of the enforcing authority officer to return it to the System Manager, unless the Court has directed that it should be destroyed instead of being handed back to the Council. In such case the System Manager shall be informed in writing, of this court direction.

Provision of Photographic Stills

- 9.11 An authorised enforcement officer may request Wiltshire Council as the owner of the intellectual property rights of the recorded data to produce still photographs from such data. All such still photographs will be indexed and recorded in file retained by the System Manager.
- 9.12 A Log will be kept by the System Manager in which details of any still photographs produced will be recorded, including dates, times, camera number and location as source of data and names of the persons producing the photographs).
- 9.13 Any photograph released to an enforcing agency will be kept secure and its handling logged, following the procedures set out above in respect of recorded material.

10 COUNCIL USE OF RECORDED MATERIAL

- 10.1 A Council Officer may ask the System Manager to view the recording of a specified incident which may involve, or appear to involve non criminal activity, but which is as specified within the stated purposes of the system which may involve the Council services for which the Officer is responsible and has been made aware of. (e.g. anti-social behaviour, abuse of reception staff, vandalism, damage or obstruction, illegal waste disposal).
If the request is within the stated purposes contained in this code, permission for data retrieval may be granted, by the System Manager, after consultation with the Corporate Information Team, if necessary.
- 10.2 The procedure to be followed in respect of accessing data in this situation, and the restrictions on its use will be the same as section 9 'Use of Recorded Material by enforcing agencies'. i.e.
- a data release form must be completed and retained (for 6 years),
 - this form must be signed by both the System Manager (or deputy) and the person receiving the data on any transferable medium.

11 DEALING WITH COMPLAINTS

- 11.1 Complaints relating to the CCTV system or its operation should be made in the first instance to the Corporate Information Team in writing.
- 11.2 All such complaints will be passed to / discussed with the System Manager.
- 11.3 If the complainant is not satisfied, they are able to take the complaint further using Wiltshire Council's general complaints procedure.
- 11.4 The Corporate Information Team will ensure every complaint is acknowledged, in line with normal Council Policies, which acknowledgment will include advice to the complainant of the enquiry procedure to be undertaken.
- 11.5 Copies of all complaint letters received, acknowledgment letters, replies and any other directly related information or documentation shall be retained by the Corporate Information Team.

12 EVALUATION, MONITORING AND AUDIT OF SCHEME

- 12.1 The Owner should arrange for independent evaluation at least every three years to establish whether the system has met its key objectives and that it is operated in compliance with the code of practice. This will be compiled in a report to the System Manager, for onward transmission to the Corporate Leadership Team. Such report will then be made available for public access.
- 12.2 An Annual Report will be compiled by the System Manager and made available to the Corporate Leadership Team.

The topics covered within the report should include details of the following:-

- Current geographical area(s) of operation
 - Any changes to the operation or management of the CCTV System
 - Code of Practice, including changes in camera locations
 - Any changes that have been made to the policy or key procedures and budget implications
 - Any proposals to expand or reduce the operation of the Scheme
 - The aims and objectives for the next 12 months
 - Details of the Scheme's achievements during the previous 12 months.
-