

Sefton Metropolitan Borough Council

CCTV POLICY STATEMENT

1. Introduction

- 1.1 Sefton Council uses Closed Circuit Television (CCTV) systems in public spaces, within car parks and at several of Council owned sites.
- 1.2 This document along with individual systems Codes of Practice are designed to give clear guidelines on the Council's use of CCTV and to protect it and its CCTV operators from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system.
- 1.3 This policy covers the purchase and use of CCTV equipment and the gathering, storage, use and disposal of visual data. This policy applies to all staff employed by Sefton Council and should be the standard expected from any external agencies or persons who operate CCTV systems on its behalf.
- 1.4 This document should be read in conjunction with the CCTV systems Code of Practice and Operational Manual. Failure to comply with these documents could lead to disciplinary action, which may lead to dismissal and in certain circumstances criminal proceedings against the individuals concerned.

2. Objectives of CCTV Systems

- 2.1 It is important that everyone and especially those charged with operating the CCTV systems on behalf of Sefton Council understand exactly why each of the systems has been introduced and what the cameras will and will not be used for.
- 2.2 Each CCTV system will have its own site or task specific objectives. These will include some or all of the following:
 - **Protecting areas and premises used by staff and the public;**
 - **Deterring and detecting crime and anti-social behaviour;**
 - **Assisting in the identification of offenders leading to their arrest and successful prosecution or other appropriate action;**
 - **Reducing violent or aggressive behaviour towards staff;**
 - **Reducing fear of crime, anti-social behaviour and aggression;**
 - **Protecting property and assets owned by Seftonarc Sefton Council;**
 - **Assisting in staff disciplinary, grievance, formal complaints and Health and Safety Investigations.**
- 2.3 The systems will not be used for any other purpose than those set out in this document without prior consultation with the senior manager responsible for CCTV – and where appropriate notification to staff and following consultation with the Trade Unions and also where appropriate, residents who live in the property. Any novel or non standard use of the CCTV cameras are to require the approval of the above manager.

- 2.4** Cameras will not be used to monitor the progress of staff or individuals in the ordinary course of lawful business in the area under surveillance. Nor are managers permitted to use the cameras to observe staff working practices or to assist them in the day-to-day management of their staff.
- 2.5** Individuals will only be monitored if there is reasonable ground to suspect a serious criminal offence. In any case where CCTV has witnessed such incidents, (and officers wish to use footage as part of any investigation) officers should consult the heads of legal service, Human Resources and where appropriate Trades Unions.
Any requests to use CCTV other than for incidents that are historical will only be considered if RIPA, (Regulation of Investigatory Powers Act 2000) is applied. Without such authorisation CCTV will not be used under any circumstances.
- 2.6** **Since 1st November 2012, local authorities are required to obtain judicial approval from a justice of the peace, prior to using covert techniques, including covert surveillance. Also, from that date, the use of covert surveillance by local authorities is limited to the investigation of crimes which attract a 6 month or more custodial sentence, with the exception of offences relating to the under-age sale of alcohol and tobacco.**
- 2.7** Body worn cameras
1. The expectation is that the BWV device will only be used where there is an evidence gathering opportunity.
 2. Users should only commence recording as soon as they become aware that the encounter is likely to necessitate the need to gather evidence.
 3. On commencement of any recording the user should make a verbal announcement, where practicable, to indicate why the recording has been activated, the nature of the incident to which deployed or confirmation to those present that the incident is now being recorded using both video and audio.
 4. If the recording has commenced prior to arrival at the scene of an incident the user should, as soon as is practicable, announce to those persons present at the incident that recording is taking place and that actions and sounds are being recorded. Specific words for this announcement have not been prescribed in this guidance, but users should use straightforward speech that can be easily understood by those present, such as, "I am video recording you", "I am video recording this incident" or "everything you say and do is being recorded on video".
 5. In so far as is practicable, users should restrict recording to areas and persons necessary, in order to obtain evidence relevant to the incident and should attempt to minimise collateral intrusion to those not involved.
 6. There should always be a valid reason for the viewing of all captured body worn video.
 7. Any 'non-evidential' BWV footage recorded is only retained for 31 days in accordance with the ACPO guidelines and the Data Protection Act.
 8. BWV footage is restricted and cannot be disclosed to third parties without their express authority unless prescribed by law.

9. Recorded data is 'Sefton Council Information' and it can be accessed on request in writing in accordance with Section 7 of the Data Protection Act 1998 and/or Section 8 of the Freedom of Information Act.
10. Staff operating BWV should be aware that an infringement of this protocol may be dealt with through the council's disciplinary procedure. Additionally, the recordings made on a device may be used to provide evidence in internal disciplinary proceedings relating to misconduct.

Dashcams

1. Although Sefton Council uses dashcams some vehicles they are not used to carry passengers. However, staff using any vehicles fitted with these devices should be made aware of their presence.
2. All data from dashcams will be managed in accordance with the general use of CCTV throughout this protocol.

3. Legislation

3.1 The Council's use of CCTV is subject to the following legislation:

3.1.1 The Data Protection Act 1998 (DPA).

3.1.2 The Human Rights Act 1998 (HRA).

3.1.3 The Freedom of Information Act 2000 (FOIA).

3.1.4 The Regulation of Investigatory Powers Act 2000 (RIPA).

3.1.5 The Protection of Freedoms Act 2012

Additionally, the Home Office has published the "Surveillance Camera Code of Practice" which sets out the 12 "Guiding Principles" to be adopted by CCTV system operators. These "Guiding Principles" are:-

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.

5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. 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.
8. Surveillance camera 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.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. 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.
11. When the use of a surveillance camera 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.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

The Council adopts the 12 “Guiding Principles” as part of this Policy.

3.2 It is important that the operation of all Council run CCTV systems comply with all relevant legislation [including the above] and Codes of Practice. This is to ensure that staff running the CCTV systems, the public and the Council itself are protected from abuses of the CCTV systems. The Responsible Officer will be responsible for reviewing all CCTV documentation relating to their system annually (or as changes occur) and ensuring the information in those documents is up to date. The CCTV Manager who acts as the Single Point of Contact (SPOC) will assist in this process.

4. Responsibility

4.1 Heads of Service have overall responsibility for CCTV systems used within their departments. Close supervision rests with the Heads of Service. The Responsible Officer for the purposes of this Policy Statement is the Head of Security Services.

4.2 The Security Services Manager is also the SPOC/CCTV Manager and is responsible for ensuring all users are kept up to date on legislation and changes in procedures and will review Sefton Councils Policy and Codes of Practice documents annually, and maintain a central database of all documents relating to the Councils CCTV system.

4.3 The CCTV Manager

Is responsible for:

- 4.3.1 The day-to-day operation of the CCTV system within their charge and the security and accountability of all equipment and media used by their system. This includes any system owned by the Council but which is in the possession of third parties such as those cameras deployed in shopping precincts, commercial properties and swimming pools.
- 4.3.2 Making sure that authorised staff using the CCTV system are properly trained in the use of the equipment and comply with the Code of Practice and policies and procedures. They are not to permit any other staff to operate the equipment or view images without authorisation.
- 4.3.3 Acting as the first point of contact for enquires, complaints and requests for evidence and as the liaison officer for all external and internal contacts.
- 4.3.4 The CCTV Manager may not hold the positions of Designated Officer and an Officer role for Safeguarding as set out in the Safeguarding Children and Vulnerable Adults Policy.

4.4 CCTV Staff Operating CCTV Systems

- 4.4.1 Staff operating CCTV systems are responsible for operating the equipment in accordance with requirements set out in current legislation, this policy document, guidelines, confidentiality certificates, Codes of Practice and local Operational Manuals.
- 4.4.2 They must ensure that their training is up to date.
- 4.4.3 They are responsible for bringing any faults or misuse of the equipment to the Responsible Officer's attention immediately.

4.5 CCTV in Third Party Occupied Buildings

- 4.5.1 A number of CCTV systems may exist in council owned buildings where the service is provisioned by another organisation. These organisations will appoint a responsible officer who is responsible for the CCTV systems. A 'letter of understanding' should be produced and signed by the third party responsible officer and the council's CCTV Manager and will clearly state the responsibilities and accountability on both parties.

5. Purchase and Deployment of CCTV Cameras

- 5.1 Sefton Council is committed to respecting people's rights to privacy and supports the individual's entitlement to go about their lawful business. This is a primary consideration in the operation of any CCTV system, although there will inevitably be some loss of privacy when CCTV cameras are installed.

- 5.2 Therefore it is crucial that serious consideration is given to the necessity for cameras in a given location and their impact on the privacy of individuals using the areas where cameras are to be installed.
- 5.3 Cameras are not to be installed in such a way that they can look into private space such as houses. If cameras are required in these areas they must only be installed if they can be fitted with privacy zones, which block out private areas so that they cannot be viewed or recorded.
- 5.4 Covert cameras are not to be deployed into areas used by staff or the public. Cameras should be clearly visible and clearly signed.
- 5.5 Concealed and unsigned cameras within property may on rare occasions be deployed in areas of high security where there is no legitimate public access and where staff access is controlled and restricted. Staff who normally work in these areas should where appropriate be informed of the location of these cameras, their purpose and where the monitor is kept.
- 5.6 Sefton Council will not use CCTV cameras if there are less intrusive and more effective methods of dealing with the problem.
- 5.7 No individual department or service will be permitted to purchase or install CCTV cameras until a full Operational Assessment and Privacy Impact Assessment have been completed and presented to the CCTV Evaluation Panel for approval.
- 5.8.1 Before deciding on CCTV, departments will be required to look at less intrusive alternatives. Each alternative is to be documented in the documents in paragraph 5.7 above, along with the reasons for its unsuitability to resolve the issue.
- 5.9 If after looking at all the alternatives it is decided that CCTV is the only suitable solution a clear operational objective for the system and each camera must be identified and an assessment on the impact on privacy must be carried out . A record of these decisions must be retained for inspection and review every year. A copy of these documents should be sent to the CCTV Manager and will need to be presented to the Evaluation Panel before any purchase is authorised.
- 5.8 Authorisation for the purchase and installation of CCTV cameras must be approved by the Evaluation Panel who will consult the CCTV Manager. Proof where appropriate of consultation with staff, Trade Union representatives and other stake holders has taken place will also be required by the Evaluation Panel before a final recommendation is made.
- 5.9 How the system will be paid for and its annual revenue costs and how they will be met must also be identified.
- 5.10 The CCTV Manager will be available to give advice at each stage of the above process.
- 5.11 Once authorisation is given to purchase CCTV cameras, advice should be sought from the Council's Procurement Team to ensure that correct procedures are followed.
- 5.12 It is a requirement under the Information Commissioners Code of Practice and the National CCTV Strategy that any equipment purchased is fit for purpose and will meet the objectives set down for the scheme. There is also a clear requirement for all CCTV schemes to have

an effective maintenance schedule and Code of Practice. Officer's purchasing new CCTV equipment need to ensure these requirements are met.

- 5.13 This organisation does not deploy 'dummy' cameras as these give a false sense of security. Neither are officers to purchase cameras that can monitor conversation or be used to talk to individuals as this is seen as an unnecessary invasion of privacy.
- 5.14 Once new cameras have been installed a copy of a map or building plan showing the location of the CCTV cameras should be sent to the CCTV Manager for inclusion in the central CCTV library.

6. Monitoring

- 6.1 CCTV monitors sited in reception areas are intended to provide live monitoring of reception areas by departments. It is the responsibility of the Responsible Officer in the departments concerned to ensure those observing the monitors are properly trained in their duties and responsibilities and that the ability to view the monitors is restricted to those authorised to see it.
- 6.2 Monitoring of other cameras where required will only be carried out by persons authorised by the Responsible Officer.

7. Viewing Images and the Provision of Evidence

- 7.1 The casual viewing or trawling of images is strictly forbidden. Viewings must only be undertaken for a specific, legitimate and documented purpose.
- 7.2 The provision of evidence or viewings will normally be requested either by the police, other enforcement agency or another department conducting an investigation into criminal activities, potential; disciplinary matters, complaints, grievance or health and safety issues.
- 7.3 Enforcement agencies such as the police have a legal requirement to 'seize' any relevant evidence when investigating a crime and the CCTV Manager must comply with their request. But the enforcement agencies are bound by the same rules as everyone else.
- 7.5 Enforcement agencies are not permitted to trawl the CCTV system on the off chance of detecting a crime or wrong doing. They are required to provide the CCTV Manager or operator acting on his/her behalf with suitable information to cover the council's responsibilities under s29(3) of the Data Protection Act.
- 7.6 The release of evidence or permission to view images may only be authorised by the CCTV Manager or duty Control Room Operator in his/her absence. Where an enforcement agency requests copies of an image, one copy is to be made but there is no requirement for the CCTV Manager or duty Control Room Operator acting on his/her behalf to retain or produce any further copies.
- 7.7 If the matter concerns a member of staff, there will be no automatic right to viewing or the release of images. Viewings will be permitted and images will only be released to a properly authorised investigating officer after they have submitted a formal request to the Departmental Director.
Where it is decided that CCTV images will be used as part of an investigation staff will be given a copy in order to mount a defence. Please note section 7.11

- 7.8 The CCTV Manager or duty CCTV operator acting on his/her behalf will then hold the relevant footage on the computer's hard drive (but not copy it to disc) and then seek authority to release the images from the Head of Service. The Head of Corporate Resources and where appropriate the Head of Regulation and Compliance should also be consulted before the images are released to the Investigating Officer.
- 7.9 **This process should take place as quickly as reasonably possible** so that the investigation is not unnecessarily delayed. To ensure the images are not lost due to retention time, the Investigating Officer can formally ask the CCTV Manager to retain the images until the viewing/ release of evidence process has been completed.
- 7.10 Once authorised, arrangements will be made to enable the Investigating Officer to view the images and if necessary be issued with two copies of recorded material on suitable recording media. Note: Only the Investigating Officer is permitted to view the images at this stage.
- 7.11 The reason for the second disc is that if it is decided to use CCTV images in an employment related hearing the employee being investigated must be given a copy of the images to permit them and their representatives to mount a defence. If a decision is made not to use the images then the data will destroyed immediately. At the end of the hearing ALL copies of the images are to be collected by HR, held on file and destroyed once the appeals process and any Employment Tribunal processes have been completed.
- 7.12 Staff who are subject to disciplinary, complaints or grievance procedures have the right to request that footage be retained if they believe it will support their defence. The process will be exactly the same as that shown above for the Investigating Officer.
- 7.13 **Sefton Council will not permit viewings or release images to people being investigated by an enforcement agency or in an internal investigation, which may be handed over to an external agency such as the police.** The responsibility for investigating and disclosing images to those involved in the investigation are covered by the Police and Criminal Evidence Act (PACE) and the Evidence and Disclosure Act and the prosecuting authorities are required to follow the procedures set out in these Acts. It should be noted that other enforcement agencies will operate under other legislation but the use of and disclosure of the evidence rests with them.
- 7.14 It is critical that a full and detailed record is kept of all viewings of the systems and all instances when images are issued. This information must include:
- Date, time, camera number and location of the incident
 - The name of the authorising officer
 - The date time, name and contact details of the person viewing or removing images
 - The reason for the viewing/ issue of images
 - The person who released and the received the images signatures
 - Any media containing images should be uniquely marked and the number recorded for ease of identification

8. Insurance Claims

- 8.1 CCTV involvement in insurance claims fall into two categories. First, incidents which may result in claims against Sefton Council and secondly claims involving third parties, normally traffic accidents.
- 8.2 CCTV cameras may be able to assist in incidents that could result in a claim against Sefton Council. When a report is received which may result in a claim, the officer responsible for dealing with the incident should consider whether CCTV covers the area. If so they should then ask the CCTV systems Responsible Officer to hold images for that period but this must be done within 28 days from the date of the incident. The officer dealing with the incident should then follow the procedures for viewing and obtaining evidence, which is set out in section 7 above.
- 8.3 If evidence is issued to the officer dealing with the incident, they become responsible for the security, safety and integrity of the images. All recorded media must be stored in a secure place with access limited only to those people involved in the subsequent claim. At the end of the waiting period or after any claim has been dealt with this officer will be responsible for the destruction of the recorded media by shredding and a record in the form of a signed memo to that effect will be kept for a period of 12 months.
- 8.4 Requests for assistance from CCTV cameras in third party claims are increasing especially with regard to traffic accidents. Often it is the person involved in the accident who will contact CCTV and ask either if we have any images or if they can come and view the images. Members of the public should be advised to make a 'subject access request' (SAR) through the normal corporate procedure. If the footage only contains images of the data subject this can be considered for disclosure. If the footage also involves images of third parties, the data subject should be provided with a written summary of what can be seen in the footage. If on receipt of this information the data subject or their insurance company feel a copy of the images would be useful in the investigation of their accident the data subject can then give consent to their insurance company to access the images on their behalf for the purposes of the investigation.
- 8.5 If the correspondence arrives within the recording period, the CCTV Manager or duty operator acting on his/her behalf should view the images. If the incident was not caught on camera the insurers or solicitor can be called and informed and the case can be closed. If the letter arrives after the recording period, there will be no relevant images and again the person requesting the images should be informed in writing.
- 8.6 If relevant images are found on the recorder, the insurance company/ solicitor should be informed and asked if they want a copy. (And include evidence they are acting on behalf of the subject). If they do, then they need to be informed that there will be a fee. The fee should be based on the amount of time spent by staff viewing, copying and processing the images based on the hourly salary rate rounded up to the nearest hour. It should also include post and packaging and the cost of the media supplied. This should then be sent as an invoice to the recipient. No charges will be raised against internal requests for assistance. Please note that the maximum fee, (set by legislation) for *viewing* the footage is £10.
- 8.7 The images may then be copied and sent to the relevant person accompanied by two copies of a letter reminding them that the Council retains 'copyright' over the images, that they are responsible for the security and destruction of the images and that the images may not be used for any other purpose other than the one they were released for. The details of

the media released should be included (i.e. media number) in the letter and they should be asked to sign one copy of the letter confirming they have received the images and accepting the conditions of release. A detailed record of all actions must be maintained. Failure to comply with the conditions of release may result in legal action being taken against the person who signed the acceptance letter.

9. Signage

- 9.1 All areas where CCTV is in use should be clearly signed to comply with the Data Protection Act. This is to warn people that they are about to enter an area covered by CCTV cameras or to remind them that they are still in an area covered by CCTV. The signs will also act as an additional deterrent. CCTV signs should not be displayed in areas, which do not have CCTV cameras.
- 9.2 Where 'covert' cameras have been authorised for deployment, signage will not normally be erected.
- 9.3 The signs should have a yellow background with all writing in clear black print. The sign should carry the CCTV camera and organisations logo. The information on the sign should explain why the CCTV cameras are there, who runs them and a contact number. The signs, position and the message needs to be big enough to enable people to easily read the information on it. For pedestrians the sign should be A4 size and for vehicle access A3 size

10. Requests for Information

- 10.1 Under the Data Protection Act and the Freedom of Information Act members of the public and other organisations have the right to ask to see data held by local authorities and other public bodies. This data includes visual images captured by CCTV. Any such request should be directed to:

information@sefton.gov.uk

There are certain circumstances when it will not be possible to provide images from CCTV - for example, when the images form part of a criminal investigation. Advice on these exemptions can be obtained from the Information Governance Team. In all instances where Subject Access Requests and Freedom of Information requests are received, they should be passed onto the Information Governance Team for logging and validating, before CCTV images are released.

- 10.2 In certain circumstances a summary of events will be provided to the requester so they can make a judgement on whether to instruct their insurance provider/solicitor for the full record.

11. Recording Systems

- 11.1 All staff required to operate CCTV equipment are to receive training in the use of the equipment and must conform to this policy document and their systems Code of Practice at all times. Staff who operate the recorders will be required to sign a 'confidentiality statement', which prohibits them from making any material available for purposes other than those stated in the Code of Practice. Any other staff having access to the equipment will also sign a confidentiality statement. Once signed, the confidentiality statement should be placed in the individual's personnel file.
- 11.2 Except for evidential purposes images will not be copied in whole or in part.

- 11.3 Recorded material will not be sold or used for commercial purposes or the provision of entertainment. Images provided to the police or other enforcement agencies or for internal investigations shall at no time be used for anything other than the purposes for which they were originally released.
- 11.4 Recording equipment and recording media will be kept in a secure location and no access will be granted to unauthorised staff.
- 11.5 All images will remain the property and copyright of Sefton Council.
- 11.6 Each new recording media must be clearly marked with a unique reference number in indelible ink before it is brought into operation.
- 11.7 Each use of media will be documented. Unused media or media awaiting issue will be held in a secure cabinet in such a way that completeness of the archive is immediately apparent. Images will be retained for a period of 30 days. The CCTV register will be stored in a secure place.
- 11.8 All media will be disposed of securely in line with the council's Corporate Retention and Disposal Schedule
- 11.9 All recording protocol should be an 'open' protocol. This enables the Police and other agencies to view evidence on their own systems without having to preload operating software. This is important because most police computers are unable to download unauthorised software, which means they will be unable to use the CCTV images for their investigations.

12. Disciplinary Offences and Security

- 12.1 Tampering with or misuse of cameras, monitoring or recording equipment, images or recorded data by staff may be regarded as misconduct/gross misconduct and could lead to disciplinary action, which may result in dismissal or criminal prosecution.
- 12.2 Any breach of this policy document or the CCTV Code of Practice will be regarded as a serious matter. Staff who are in breach of this instructions will be dealt with according to the Councils disciplinary procedures.
- 12.3 The responsibility for guaranteeing the security and proper use of the system will rest with the Responsible Officer of the system concerned. These officers will, in the first instance, investigate all breaches or allegations of breaches of security or misuse and will report his/her findings their Service Manager or Head of Service.

13. Statistics

- 13.1 CCTV installation like any other purchase by a public body is spending public money and this needs to be justified. CCTV systems are required is to show how effective the cameras are in dealing with the objectives set out for them.
- 13.2 The Responsible Officer will be required to submit an annual set of statistics showing the effectiveness of their systems to their Head of Service with a copy being sent to the Service Manager. The statistics will cover the previous financial year (1st April – 31st March).

14. Inspections/ Visits

14.1 All CCTV system may be subject to inspections or visits by a member of the Information Commissioners Office or the Regulation of Investigatory Powers Commissioner. In addition, systems may also be subject to visits/ inspections by members of the organisation and the CCTV Manager.

14.2 These visits/ inspections are designed purely to ensure that the systems are being run in accordance with current legislation, this policy guideline and their own Codes of Practice and to offer advice for improvement where required.

15. Health and Safety

15.1 The Responsible Officer is to ensure that staff are made aware of and comply with all Sefton Councils policies on health and safety. In particular they are to be aware of policies relating to working with electrical equipment, VDU Regulations.

16. Complaints

16.1 Complaints about the operation of a CCTV system should be addressed initially to the CCTV Manager. Complaints will be dealt with in accordance with Sefton Council's complaints procedure. Details of how to complain can be found at :- www.sefton.gov.uk/your-council/consultations,-complaints-feedback.aspx

17. Further Advice/ Information

17.1 Further advice on CCTV related matters may be obtained from the individuals and organisations shown below:

Operations Manager
Seftonarc
Sefton Council
209 Linacre Lane
Bootle
L20 6AD

Data Protection Officer
Sefton Council
7th Floor
Merton House, Stanley Road
Bootle
L20 3UU

Head of Security Services
Seftonarc
Sefton Council
209 Linacre Lane
Bootle
L20 6AD

Security Services Manager
Seftonarc
Sefton Council
209 Linacre Lane
Bootle
L20 6AD

