

# Communities, Housing & Environment

15 November 2016

Is the final decision on the recommendations in this report to be made at this meeting?

**Yes**

## Review of CCTV funding – findings and options

<b>Final Decision-Maker</b>	Communities, Housing and Environment
<b>Lead Head of Service</b>	John Littlemore – Head of Housing and Communities
<b>Lead Officer and Report Author</b>	Georgia Hawkes – Service Improvement Manager
<b>Classification</b>	Public
<b>Wards affected</b>	All

### This report makes the following recommendations to this Committee:

1. Note that the council intends to re-negotiate the service provided by Medway and extend the CCTV partnership agreement for one year, to 31 March 2018.
2. Note that a review of the current provision and siting of static cameras will be carried out to ensure the council complies with the Surveillance Camera Code of Practice 2013.
3. The following options for the use of CCTV funding are developed further and a final recommendation made to Communities, Housing and Environment Committee in January 2017:
  - Reduce the CCTV service – considering reduced camera numbers and reduced hours of active monitoring of the static CCTV cameras
  - Explore other funding or commercial opportunities
  - Better use of new technology

### This report relates to the following corporate priorities:

- Keeping Maidstone Borough an attractive place for all – CCTV is one of the interventions used by the council and our partners to prevent crime and disorder and ensure public safety. Static CCTV cameras are mainly sited in the town centre and vicinity.

### Timetable

<b>Meeting</b>	<b>Date</b>
Corporate Leadership Team	01/11/16
Communities, Housing and Environment	15/11/16

# **Review of CCTV funding – findings and options**

## **1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY**

- 1.1 This report summarises the findings from the review of CCTV funding carried out June – October 2016, details the potential options available and recommends which options should be developed in more detail with our partners and reported back to committee in January 2017.
  - 1.2 The review found that CCTV by itself is not particularly effective in preventing crime and disorder, although it is more effective when used with other interventions. However, it can be useful to aid investigation of crime and disorder and our partners, residents and visitors value CCTV. The entire CCTV system requires an audit to ensure the council complies with the Surveillance Camera Code of Practice 2013; around 49 of the 95 static cameras pick up 3 incidents per month or fewer, so it is possible these would no longer have a continued justification under the code. The recommendation is that options for CCTV are developed further with members and partners, particularly Kent Police, and a firm recommendation for service changes is presented to committee in January 2017.
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## **2. INTRODUCTION AND BACKGROUND**

- 2.1 The council has to make savings in the region of £4.2m in the next 4 years. In order to deliver those savings, areas of large spend, both in-house services and outsourced contracts, are being reviewed. There is a statutory duty on the council to do all that it reasonably can to prevent crime and disorder in its area. However, the council does not have a statutory duty to achieve this through the provision of a CCTV service. CCTV cost the council about £340K in 2015/16.
- 2.2 A static CCTV system was introduced in 1995 and initially comprised just 10 cameras. The council now provides 95 static cameras which are monitored 24/7 and maintained by Medway Council as part of a partnership agreement with Medway, Maidstone, Swale and Gravesham. The cost of the static CCTV service was about £315K in 2015/16; £232K of this was for the contract with Medway to deliver the static CCTV service.
- 2.3 The CCTV partnership agreement expires on 31 March 2017 and discussions have been held with the other councils and the provider about whether or not to extend the partnership agreement and what level of service is required. All partners are minded to extend the agreement for 12 months. The council aims to incorporate any changes in CCTV provision that might be agreed by committee in January 2017 into the re-negotiation and extension of the partnership agreement. This means it is possible to both extend the partnership agreement for a year and deliver service changes and savings for 2017/18.
- 2.4 The vast majority of the static CCTV cameras cover the town centre and vicinity, but the following areas also have some CCTV coverage:

- Cumberland and Northumberland Avenues and surrounding areas in Shepway
- Mangravet
- Coombe Farm Estate and link roads with the Town Centre
- Maidstone Leisure Centre
- Park & Ride car parks
- Bircholt Road, Parkwood Industrial Area
- Cobtree Manor

2.5 The council also has 28 mobile cameras. 5 are used in parks and open spaces and 2 are allocated to the environmental enforcement team to deploy for issues like fly tipping. 4 of the cameras have s.106 (planning contribution) agreements attached to them, meaning they have to stay within the vicinity of the area in the s.106 agreement. The mobile cameras are administered by a PCSO and the council pays half the salary for this post. The PCSO also periodically monitors the data recorded on mobile cameras owned by some parish councils. The cost of the mobile CCTV service was about £25K in 2015/16.

2.6 The CCTV budgets are approximately £80K overspent. This is mainly due to an unrealised historic budget saving, a reduction in income from monitoring CCTV for organisations like the NHS and Kent County Council and an historic overspend on the cost of static camera fibre lines to transport the information from the cameras to the matrix at the Town Hall. Expenditure on the CCTV monitoring contract with Medway has remained within budget since the inception of the agreement.

### **Review Methodology**

2.7 The review of funding currently used for CCTV started in June 2016. The main objectives were to:

1. Assess the effectiveness and value for money of the current CCTV system in achieving the council's legal obligation under section 17 of the Crime and Disorder Act 1998 to do all it reasonably can to prevent crime and disorder and ensure public safety.
2. Identify alternative options that could deliver the council's legal obligations and provide value for money

2.8 The following actions were carried out to answer how effective CCTV in the borough is, how useful individual cameras are and what alternatives to the current delivery model could be:

- Literature review of national and international research about effectiveness of CCTV in preventing, reducing, detecting, investigating and prosecuting crimes
- Mapping of CCTV cameras, the incidents each camera picks up and the number of recorded crime and disorder incidents in the vicinity of each camera
- Analysis of CCTV budgets and expenditure

- Analysis of the use of mobile cameras
- Stakeholder consultation with key partners such as Kent Police (including Julia Chapman, Chief Superintendent), Urban Blue Bus, Street Pastors, Swale Council, Gravesham Council, Medway Commercial Group Solutions and Kent Police & Crime Commissioner
- Public consultation with residents/visitors and businesses in Maidstone through completion of online survey
- Soft market testing with Medway Control group and an alternative supplier of CCTV monitoring

### **Key findings from the review**

2.9 The key findings from the workstreams are detailed below.

#### **2.10 National and international CCTV studies:**

1. Public CCTV is effective at preventing vehicle crime, but CCTV on its own does not have a significant effect on violent crime and has little or no effect on crime in city centres.<sup>1 2</sup>
2. CCTV is most effective in high coverage areas.
3. CCTV should not be used as a stand-alone measure to reduce crime and disorder; it will always be more effective when used as part of a package of interventions.<sup>3</sup>
4. CCTV can be useful for detecting and investigating crimes, with CCTV evidence saving the Police a considerable amount of time through guilty pleas.<sup>4</sup>
5. The council has a statutory duty under the Home Office's Surveillance Camera Code of Practice 2013 to review that all of its cameras are in place for a specific purpose to meet an identified pressing need and their ongoing justification is reviewed.
6. A number of authorities have reduced or turned off their CCTV function. There is very limited evidence of the effect this has had, but the information we have suggests no significant impact on crime and disorder levels.
7. It was very hard to find practical guidance on interventions to prevent or reduce crime and disorder which might be more effective than CCTV. Possible alternative or complementary interventions include improved lighting, increasing police numbers, community policing and interventions in schools.

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<sup>1</sup> Welsh & Farrington for Campbell Systematic reviews (2008), *Effects of Closed Circuit Television Surveillance on Crime*, 2008

<sup>2</sup> Gill & Spriggs (2005), *Assessing the impact of CCTV*, Home Office research study 292, 2005

<sup>3</sup> Armitage for NACRO (2002), *To CCTV or not to CCTV?*

<sup>4</sup> Levesley & Martin (2005), *Police attitudes to and use of CCTV*. Home Office Online Report 09/05

### 2.11 Stakeholder engagement:

1. Both the static and mobile CCTV services are valued by Kent Police, particularly in terms of investigating crime and disorder and for the night time economy.
2. Kent Police in Maidstone believe that proportionately reducing the number of static cameras and/or monitoring hours based on an assessment of threat and risk and the volume of incidents would have a limited impact on police operations.
3. Kent Police risk assess and prioritise all calls for attendance to ensure their resources are effectively used to protect the public e.g. officers do not routinely attend reports of shoplifting, but would attend if an offender had been apprehended or there was a risk to the public. This would not preclude an investigation taking place where the store has CCTV or evidence of the suspect's identity.
4. There is a team of three PCSOs dedicated to the town centre who focus on day time economy issues. They are supported by the Community Policing Team who are flexibly deployed in terms of location and shift according to demand and crime trends and other patrols respond to calls in the town centre as required. The town centre night time economy does not have a dedicated PCSO team, but a night time economy presence is provided by other 24/7 patrols and Special Constables who respond to calls in the town centre and around the borough as required.
5. Our partners who work in the town centre, like the Urban Blue Bus and Street Pastors and the enforcement officers, value CCTV. Urban Blue Bus have said they will not operate any more on a Saturday night without CCTV and centralised radio.

### 2.12 Static CCTV operations:

1. Kent Police currently fund the use of Airwave radios in the CCTV control room and the feed from the CCTV control room into the Kent Police Control Room where 999 and 101 calls are handled for both Kent Police and Kent Fire and Rescue Service.
2. The CCTV operators are also the operators for the Maidsafe centralised radio network, which is administered by One Maidstone and used by businesses in the day time and night time economy. Businesses pay One Maidstone to be part of the radio network but do not pay towards the cost of the CCTV operator.
3. About half (49) of the static cameras in the borough pick up 3 or fewer incidents a month, so may not be justified under the Surveillance Camera Code of Practice 2013. This means the static CCTV system will need to be audited to ensure the council is complying with this statutory guidance.
4. Generally, the cameras situated where crime and disorder levels are higher pick up more incidents.

5. The majority of the reports to the CCTV control room come from Kent Police and the centralised Madsafe radio network, which covers the day and night time economies.

#### 2.13 Mobile CCTV operations:

1. The council has many more mobile cameras than some of our neighbouring boroughs.
2. The deployments are made using a cherry picker which will need repairs within the next year costing about £5K. It will probably need to be replaced within 3-4 years, at a cost of around £40K.
3. There were 63 mobile camera deployments in 2015/16. 53 of these requests came from Kent Police, 6 from council officers or members, 2 from Golding Homes and 2 from wardens.
4. The main reason for the requests for deployment was due to nuisance youths causing antisocial behaviour issues: 21 requests were made because of nuisance youths. Other reasons for requests for deployment were for parcels being thrown over the wall at Maidstone Prison (7), nuisance vehicles (7), criminal damage (10), drug issues (5) and fly-tipping (2).
5. Mobile cameras are deployed around the borough, mostly outside of the town centre and vicinity.
6. Anecdotally, the mobile cameras can be successful when they are deployed, but more work needs to be done to introduce more robust analysis of the impact of each deployment.

#### 2.14 Alternative funding options:

1. Kent Police and the Police and Crime Commissioner have both made clear that they are unable to contribute towards the annual ongoing revenue cost of CCTV.

#### 2.15 Consultation with Maidstone residents and town centre visitors:

1. Over 1,000 people responded.
2. A much larger percentage visit town regularly in the day (88% visit at least monthly in the day) than at night (42% visit at least monthly at night).
3. About 3 in 4 people feel safe in the day in the town centre, but only 1 in 4 people feel safe at night.
4. People feel much safer in their local areas than in the town centre.
5. People think all types of crime are much less prevalent in their local areas than in the town centre.
6. Two thirds of people (65%) say CCTV makes them feel safer but when rated against other things, people were more likely to say well-lit streets (26%) and visible police presence (25%) made them feel safe above CCTV (17%) and fewer people hanging around on the streets (13%).

7. People think CCTV is best for helping police investigate crime and catch criminals (90%) and worst at reducing re-offending (28%). 68% think it reduces crime and 55% think it deters criminals from committing crime.
8. Only 10% think CCTV is an invasion of privacy.
9. People think it is most important to have CCTV in town centre streets, local parades of shops, car parks and parks and green spaces (in descending order).

#### 2.16 Consultation with Maidstone businesses:

1. 58 businesses completed the survey. Half of these were from the town centre. We did not get many responses from retail businesses.
2. Most said their business was neither safe nor unsafe from crime (about 20% said safe and about 25% unsafe).
3. People being drunk and rowdy, drug dealing/taking and vandalism/graffiti/deliberate damage were most commonly cited as being a problem in the area of their business.
4. 55% said their business had been affected by crime in the past 3 years – antisocial behaviour, vandalism/criminal damage, drug taking dealing, assault/violence and burglary most commonly experienced.
5. 40% have their own CCTV.
6. They think CCTV is best at helping the police investigate crime and catch criminals and worst at reducing re-offending.
7. They think it's most important to have CCTV in town centre streets, parks, playgrounds and green spaces, local parades of shops and car parks (in descending order).

2.17 In summary, the evidence suggests that public CCTV by itself is not very effective in preventing crime and disorder; it is effective in preventing vehicle crime but has little or no impact on violent crime. When coupled with other interventions, it can have a greater impact e.g. in the context of its use in Maidstone, CCTV is probably more effective due to the link with the Maidsafe radio system. About half of the static cameras may not be justified due to the low number of incidents they pick up; a further audit of the static system needs to be carried out to confirm this. Our key partners in the Police and voluntary sector value the CCTV service, especially for keeping the weekend night time economy as safe as possible and investigating crime. However, neither Kent Police nor the Police and Crime Commissioner are able to contribute further to the ongoing annual cost of CCTV and the Kent Police officers we have talked to believe that the service could be proportionately reduced without significant detriment to police operations.

2.18 In terms of public perception, those who live in Maidstone and visitors to the town centre value CCTV and most say it makes them feel safer, although they say well-lit streets and visible police presence are more likely to make them feel safer than CCTV. They also say that they feel believe it is most important to have CCTV in town centre streets.

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### **3. AVAILABLE OPTIONS**

- 3.1 The following options have been identified and potential cost reductions estimated. These costs will need to be explored further and clarified as part of the further work that will be carried out to bring a final recommendation back to committee in January 2017.

1. Do nothing – No cost reduction

- 3.2 This would not have any impact on the current service. This is not really a viable option as the CCTV budgets are overspent by such a large amount and action is required to reduce the £80K overspend.

2a. Reduce the static CCTV service – Potential cost reduction £30K - £230K

- 3.3 The static CCTV service could be reduced in terms of number of cameras and/or active monitoring of the cameras by an operator. The cameras would still record when they were not actively monitored so could still be used by the Police to investigate crimes after they had occurred. However, as the CCTV operator is currently also the controller for the Maidsafe radio network, other options for the Maidsafe would have to be investigated. The main saving from reducing the hours of active monitoring would be from CCTV operator time. The main saving from reducing the number of cameras would be from fibre line costs and reduced need for maintenance and replacement. Just stopping monitoring a camera has no cost, but to properly remove and decommission a camera there is a one-off cost of about £600.
- 3.4 A number of different solutions are available under this option, ranging from reducing the numbers of cameras to around 50, which could save at least £30K, to stopping all active monitoring of static CCTV cameras and reducing the numbers of cameras to around 25 and stopping all active monitoring, which could save around £230K.
- 3.5 It is recommended that this option is considered further, in conjunction with the audit of static cameras that needs to be carried out under the council's duty in the Surveillance Camera Code of Practice 2013, and that a recommended CCTV delivery option is reported back to Committee in January 2017.
- 3.6 In identifying which static cameras could be removed, it is recommended that the following criteria are considered:
1. Number of incidents picked up by the camera
  2. Number of incidents of crime and disorder in the vicinity of the camera
  3. Whether or not the camera is in a car park and/or protects council property
- 3.7 When considering reducing the active monitoring hours of CCTV, it is recommended that the times where this is most important to ensure public

safety are prioritised. From our discussions with Kent Police and other partners, for the town centre the priority is likely to be the hours that cover the busy weekend night time economy.

#### 2b. Reduce the mobile CCTV service – Potential cost reduction less than £5K

- 3.8 The mobile CCTV service could be reduced in terms of number of cameras and/or the number of deployments and the service would still be viable. This would also mean the council would save on repairing or replacing cameras. However, the potential for revenue savings is small compared to the static CCTV service. The mobile service is valued by Kent Police and the council to enable intelligence-led deployments of cameras and may also become more important if the static camera service is reduced.
- 3.9 It is recommended that any change to the mobile service is considered alongside proposals for changes to the static CCTV service and a recommended CCTV delivery option reported back to Committee in January 2017.

#### 3. Commission other partners – Potential cost reduction unknown

- 3.10 As Kent Police also do more than any other partner to tackle crime and disorder, we have explored with them the possibility of using some of the funding we currently spend on CCTV to commission them to undertake crime and disorder reduction activities on our behalf. However, Kent Police have confirmed this is not a viable option for them currently or for the foreseeable future. There may be other partners, in the voluntary sector for example, who might be able to provide crime and disorder interventions on our behalf.
- 3.11 It is recommended that this option is not explored further at the current time, but that it is considered during 2017/18 during the year extension of the CCTV partnership; it could be that other potential alternatives are identified which are more effective in preventing crime than CCTV.

#### 4a. Decommission the static CCTV service – Potential cost reduction £315K

- 3.12 This would mean removing all of the static CCTV cameras. It would save around £315K but there would be a one-off cost of around £60K to decommission the cameras.
- 3.13 It is not recommended that this option is pursued further. Whilst evidence of effectiveness of CCTV in reducing crime is mixed at best, it is clearly valued by our partners in Kent Police, Urban Blue Bus and the Street Pastors to help make Maidstone a safer borough. It may be possible to reconsider this in 3-5 years as new technology may make CCTV obsolete.

#### 4b. Decommission the mobile CCTV service – Potential cost reduction £20K

- 3.14 It is not recommended that this option be pursued further as the potential cost saving is minimal compared to reduction in service and potential negative impact on crime and disorder around the borough.

#### 5. Explore other funding or commercial options – Potential cost reduction unknown

- 3.15 Neither Kent Police and Police and Crime Commissioner can fund the revenue costs of CCTV. However, there may be other options for bringing in additional funding or income e.g. from businesses, from creation of wireless hubs and selling internet access and advertising etc.
- 3.16 It is recommended that this option is explored further. It is highly unlikely that it will reduce costs by the £80K required to address the overspend, but may be complementary to the option of reducing the service.

#### 6. Better use of new technology – Potential cost reduction at least £10K

- 3.17 Upgrading the current matrix and recording system would allow for the existing analogue fibre circuits to be upgraded to a digital fibre circuit. This would require a one-off investment of around £20K but would save in the region of £10K p.a. There may also be other opportunities to make better use of technology like bulk buying fibre lines with our partners and creating new digital wireless infrastructure hubs
- 3.18 It is recommended that this option is explored further. It is highly unlikely that it will reduce costs by the £80K required to address the overspend, but may be complementary to the option of reducing the service.
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### **4. PREFERRED OPTION AND REASONS FOR RECOMMENDATIONS**

- 4.1 When considering the options detailed above, it is recommended that the following options are developed further with partners and a recommendation around one or a combination of these options is made to Communities, Housing and Environment Committee in January 2017.
- 2a and 2b – reduce CCTV service
  - 5 – explore other funding or commercial opportunities
  - 6 – better use of new technology
- 4.2 It is believed that one or a combination of these options is the best way for the council to reduce costs and continue to fulfil its statutory obligations to prevent crime and disorder and ensure that the use of its cameras is justified.
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### **5. CONSULTATION RESULTS AND PREVIOUS COMMITTEE FEEDBACK**

- 5.1 Discussions have taken place with Kent Police, the Police and Crime Commissioner, Golding Homes, Kingdom (litter enforcement officers), Street Pastors and the Urban Blue Bus. We tried to engage with the Crown Prosecution Service but have not had any response to emails or telephone calls.

- 5.2 Two online surveys were carried out in August 2016, one for residents of the borough and visitors to the town centre and one for local businesses. The results are shown in Appendix I.
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## **6. NEXT STEPS: COMMUNICATION AND IMPLEMENTATION OF THE DECISION**

- 6.1 Following this report, the Community Partnerships & Resilience Manager will develop the options that the Committee decide should be investigated further. A detailed recommendation on the future of CCTV will be made to Committee in January 2017.
- 6.2 A further review will take place next year to assess the options beyond the end of the existing extended contract, i.e. from April 2018.
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## **7. CROSS-CUTTING ISSUES AND IMPLICATIONS**

<b>Issue</b>	<b>Implications</b>	<b>Sign-off</b>
<b>Impact on Corporate Priorities</b>	Keeping Maidstone Borough an attractive place for all – CCTV is one of the interventions used by the council and our partners to prevent crime and disorder and ensure public safety. Static CCTV cameras are mainly sited in the town centre and vicinity.	Georgia Hawkes 26/10/16
<b>Risk Management</b>	The evidence available nationally suggests it is unlikely that crime might rise if the current service is reduced or stopped. By not decommissioning CCTV entirely and designing changes or alternative interventions to CCTV with Kent Police and other partners, the risk of an adverse impact on crime and disorder prevention or investigation will be mitigated.	Georgia Hawkes 26/10/16
<b>Financial</b>	The CCTV budgets were overspent by £80K last year and have been overspent for at least the past 3 years. The cost of the service ideally needs to be reduced by more than £80K to deal with the overspend and contribute toward the savings required in the council's efficiency plan.	Section 151 Officer & Finance Team 4/11/16

<b>Staffing</b>	The council pays half the salary of a PCSO to run the mobile CCTV camera service. The recommendations do not propose any change to this currently.	Georgia Hawkes 26/10/16
<b>Legal</b>	The options associated with the review of CCTV funding will ensure that the Council is meeting the requirements of the Surveillance Code of Practice and the Data Protection Act 1998. As a council we must ensure that any personal information captured is only processed for specific purposes, and is relevant and not excessive. Failure to carry out this exercise could result in the Council breaching the Act as there could be CCTV cameras in place without a justifiable reason. Such a breach of the Act could result in a monetary penalty of up to £500,000.	Interim Deputy Head of Legal Partnership 3/11/16
<b>Equality Impact Needs Assessment</b>	An Equalities Impact Assessment will be required as part of any recommended changes to the service and will accompany the report that comes to Committee in January 2017. Equalities data was collected as part of the residents and visitors survey and some of the results for different groups are shown in appendix I.	Anna Collier 26/10/16
<b>Environmental /Sustainable Development</b>	No implications.	Georgia Hawkes 26/10/16
<b>Community Safety</b>	CCTV is one of the methods the council and partners, especially Kent Police, use to ensure community safety. The review found that the service can be reduced without impacting on the council's legal obligations and the without significant impact on Kent Police.	Georgia Hawkes 26/10/16
<b>Human Rights Act</b>	The council has to comply with the Surveillance Camera Code of Practice 2013 which ensures that surveillance camera systems do not disproportionately interfere with a person's right to respect for their private and family life, home and correspondence, as provided for by Article 8 of the European Convention on Human Rights and that any	Georgia Hawkes 26/10/16

	interference is in pursuit of a legitimate aim.	
<b>Procurement</b>	The council is currently part of a CCTV partnership with Gravesham, Swale and Medway, with the static CCTV service being delivered by Medway. The contract expires on 31 March 2017 and the council and its partners plan to extend the agreement for a year.	Georgia Hawkes & Section 151 Officer 4/11/16
<b>Asset Management</b>	The council owns all the static and mobile cameras and some of the monitoring equipment based at the Medway Control Centre. Any cameras that might be removed could be used for spare parts of the other cameras, therefore making best use of the assets.	Georgia Hawkes 26/10/16

## 8. REPORT APPENDICES

The following documents are to be published with this report and form part of the report:

- Appendix I: Safer Communities Consultation Survey Results Summary

## 9. BACKGROUND PAPERS

Surveillance Camera Code of Practice 2013

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/204775/Surveillance\\_Camera\\_Code\\_of\\_Practice\\_WEB.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/204775/Surveillance_Camera_Code_of_Practice_WEB.pdf)

Campbell Systematic reviews, *Effects of Closed Circuit Television Surveillance on Crime*, December 2008

[https://www.campbellcollaboration.org/media/k2/attachments/1048\\_R.pdf](https://www.campbellcollaboration.org/media/k2/attachments/1048_R.pdf)

Gill and Spriggs, *Assessing the impact of CCTV*, Home Office research study 292, February 2005

<https://www.cctvusergroup.com/downloads/file/Martin%20gill.pdf>

NACRO, *To CCTV or not to CCTV?*, May 2002

<https://epic.org/privacy/surveillance/spotlight/0505/nacro02.pdf>

Levesley & Martin (2005), *Police attitudes to and use of CCTV*. Home Office Online Report 09/05

<http://webarchive.nationalarchives.gov.uk/20130128103514/http://rds.homeoffice.gov.uk/rds/pdfs05/rdsolr0905.pdf>