



Stockport Homes CCTV Control Room Code of Practice

1 Introduction

1.1 Stockport Homes Group (SHG) operates an in-house Closed Circuit Television system (CCTV) and Control Room.

1.2 This Control Room monitors CCTV, building safety alarms and access to a number of SHG's properties. In addition to this it undertakes a range of external contracts, which include operating the Public Space CCTV network on behalf of Stockport Council (including Viaduct Interchange) and providing security monitoring services on a commercial basis to businesses who pay for this service.

1.3 This Code of Practice defines the operational and management procedures for the use of CCTV, Alarm and Radio systems which operate from the Control Room.

1.4 SHG has a legal requirement to ensure that all systems are operated effectively and only used when appropriate to the defined purposes.

2 The CCTV System

2.1 Mission Statement

- To promote public confidence by developing a safe and secure environment for the benefit of those employed, visiting or using the facilities provided within the areas covered by the CCTV schemes. Stockport Metropolitan Borough Council and Stockport Homes Limited are committed to the recommendations contained in the Surveillance Camera Commissioner's Code of Practice.
- The day-to-day management of the CCTV system and compliance with the Code of Practice is the responsibility of the Control Room and Emergency Planning Manager (CREPM).

2.2 The CCTV system is housed in the Control Room, based within the Control Centre at Cornerstone, 2 Edward Street, Stockport, SK1 3NQ.

2.3 Footage captured on the CCTV system can be viewed and downloaded in the Control Room using the playback system.

2.4 The CCTV system comprises a range of moveable and static cameras situated in various locations across the Borough. Cameras are located internally and externally and cover a range of functions.

2.5 The equipment has the capability of recording footage via all cameras simultaneously 24-hours a day. The CCTV system has the capacity to store data, at a minimum this would be for 23 days after recording in all cases.

3 Purpose of the CCTV System

3.1 In all instances the cameras monitored have the primary purpose of deterring crime or anti-social behaviour and maintaining public safety whilst protecting assets. CCTV systems are intended to provide an increased level of security within a number of areas monitored for the benefit of those that live, work, trade or visit the building/area.

3.2 The CCTV system has been designed to:

- Monitor and protect Council and SHG owned assets and business interests.
- Reduce the fear of crime and Anti-Social Behaviour (ASB) and to help secure a more attractive and safer environment.
- Reduce the incidence of criminal damage, vandalism and graffiti.
- Enhance public safety in and around the monitored areas.
- Help prevent crime by deterring and detecting criminal activity and ASB, identifying and providing evidence (of a quality recording) that assists the Police and SHG's ASB team in the apprehension of offenders or perpetrators of ASB that may lead to prosecution or other legal action.

4 Legal Requirements

Purpose and Compliance with the Code of Practice

4.1 This Code of Practice is to detail the management, administration and operation of the CCTV system in the Stockport Metropolitan Borough Council area and the associated Control Centre.

4.2 The Code of Practice has a dual purpose, in that it will assist owners, management and operators to understand their legal and moral obligations whilst reassuring the public about the safeguards contained within it.

4.3 The owners, CCTV Operators and users of the CCTV systems and associated safety and security equipment connected to the Control Centre shall be required to give a formal undertaking that they will comply with this Code of Practice and act in good faith with regard to the basic principles contained within it.

4.4 All people entering the Control Centre are bound by confidentiality. Visitors to the Control Centre are informed of the confidentiality statement and by signing the visitor's book they are confirming their formal confidentiality declaration that they will treat any viewed and/or written material as being strictly confidential and that they undertake not to divulge it to any other person.

4.5 The Code of Practice complies with relevant legal requirements regarding the management of CCTV. These are:

- Surveillance Camera Code of Practice
- Data Protection Legislation

- Biometric and Surveillance Camera Commissioner Guidance
- Freedom of Information Act
- The Human Rights Act
- Health and Safety (Display Screen Equipment) Regulations
- Police and Criminal Evidence Act (PACE)
- Civil Evidence Act
- Regulation of Investigatory Powers Act (RIPA).

5 Control Room

Control Room Arrangements

5.1 All staff operating the CCTV system will be suitably trained to fulfil their duties and Licenced by the Security Industry Authority (SIA).

5.2 There must always be at least one member of staff in the Control Room at any time. At least two staff members will be present at peak times and local intelligence and information about local events will inform resourcing decisions (e.g. high-risk Football matches may require additional operators to be on duty)

5.3 Staff members take breaks from viewing the screens on a rotational basis – no less than every two hours and for a minimum of 5 minutes.

Control and Operation of Cameras

5.4 Daily checks of all cameras and the playback system are made to ensure their recording functions are in working order. Where a fault is found, this will be recorded on the Reflex Portal for repair – or with a dedicated contractor if not maintained as part of the contract.

5.5 In the case of other cameras monitored for external customers, this will be reported to the dedicated organisational individual

5.6 Staff operating camera equipment are required to act with integrity and be aware that recordings are subject to routine audit. The playback system has a detailed audit trail and will capture all viewing and recording events.

5.7 As a requirement of the organisation's Code of Conduct and other data protection legislation, staff will be expected to adhere to high levels of confidentiality regarding an individual's right to privacy.

5.8 Staff that are suspected of abusing the CCTV system will be formally investigated under the SHG Disciplinary Policy, Procedure and Guidance on the grounds of misconduct or gross misconduct. Allegations of gross misconduct that are proven may result in dismissal.

5.9 Control Room Cameras will remain restricted to Head of Service, Control Room Manager and Team Leaders for the purposes of ensuring compliance with lawful use of the CCTV system for accountability and transparency.

Control Room and Viewing Room Access

5.10 The Control Room is secured by fob access which limits access to only those who have a responsibility to operate and manage the CCTV system or staff, or for those who have responsibility for facilities management. Non-Control Room staff permitted access for authorised work i.e. ICT Team Members, Contractors, Engineers, will always be supervised whilst in the Control Room,

5.11 The Viewing Room is located within the Control Room in a private lockable room, away from the main office space.

- Access for contractors will be necessary from time to time for the purpose of maintaining the Control Room and its equipment. This will be limited to that strictly necessary for work. At no time should contractors be left unattended, and their attendance will be recorded in the Visitors Logbook.
- Other visits to the Control Room for any purpose must be approved by a member of the Control Room Management Team and recorded in the Visitors Logbook.

6 Alarm Monitoring

6.1. Fire alarms will be received by the Control Room either via the BOLD system or the Manitou system. Operators are expected to respond to Fire alarm calls as a priority and a decision as to whether a response from the Greater Manchester Fire and Rescue Service (GMFRS) is necessary, must be taken within 60-seconds of receiving the alarm call.

6.2. Where a fire is reported in any domestic dwelling the operator must advise GMFRS that there are 'persons reported' on the basis that there may be people present in the property affected.

6.3. Intruder alarms will be received by the Control Room either via the BOLD system or the Manitou system. Operators are expected to view any available CCTV before making a decision as to whether dispatch a keyholder or a Three Sixty Mobile Security Officer.

6.4. Where an intruder is confirmed, the Control Room operator should organise an emergency response from GMP by calling 999.

6.5. Lift Alarms will be received into the Control Room either via a dedicated telephone line or via the COMMEND lift alarm phone which is fitted in the Control Room. Where a person is reported as stuck the Operator should initially call the dedicated Lift Maintenance contractor who will aim to respond to fix the fault and free any trapped person(s) and monitor persons on CCTV.

6.6. Only where there is a genuine emergency (i.e. a medical emergency) should GMFRS be deployed to free any trapped person(s). This is on the basis that entrapments which are forced open often lead to significant damage to the

asset – and on the basis that GMFRS are only intended to respond when no other option is available, or they are the most appropriate response. As all lifts monitored by the Control Room are under maintenance contracts, GMFRS are not the appropriate responder in most cases.

7 Radios

7.1 Within the Control Room there are three radio systems in use:

- StoreNet – This is the radio system used to monitor shops and retail outlets across Stockport who are signed up to the radio network. The CCTV Operator will work in partnership with Security staff on the ground to share information pertinent to the detection and prevention of crime.
- MRS Radio System – All internally employed Security Patrols and Guards have access to this radio system and its purpose is to aid quick and effective communication and to provide protection to officers who may be lone-working.
- Airwave Radios – This system provides access to Stockport's J1 and J2 divisions communications team. The purpose being to support GMP during live operational deployments and to share intelligence / report Grade 1 incidents as they are witnessed by the Public Space CCTV Control Room.

7.2 SHG possesses all the necessary OFCOM radio licences for the activity undertaken by the Control Room, and it is also a TEA2 sub-licence holder which enables it to handle emergency services network radios – such as the Airwave (Police) radio system.

7.3 As a TEA2 sub-licence holder SHG is signed up to the Airwave Code of Practice which can be found here. The ways in which SHG will remain compliant with the Airwave Service Code of Practice (CoP) are:

7.4 A Partnership Management Protocol exists between Stockport Metropolitan Borough Council and GMP regarding the third-party use of Airwave by Stockport Homes Ltd

7.5 The Radio Terminal Custodian (and any deputies), supervisors or line managers and authorised radio users carry a basic security clearance

7.6 Robust procedures are in place to ensure users adhere to the CoP requirements such as annual review that all staff have read and understood the CoP

7.7 Facilities and procedures are in place to securely store handheld and/or vehicle mounted and/or desk mounted terminals

7.8 Procedures are in place to account for each terminal at all times

7.9 The procedures for reporting lost, damaged or missing terminals (specifically stating who should report what to whom) have been established, including reporting to the Home Office

7.10 Regular audits of radio terminals and accounting records have been scheduled

7.11 An auditable document set has been established to support these requirements

7.12 Stockport Homes Ltd will ensure none of the radio terminals it operates on behalf of Stockport Metropolitan Borough Council are used by employees of other organisations (including other contractors of any description)

7.13 The Radio Terminal Custodian (RTC) who has been delegated the task of ensuring all procedures are followed and equipment is used properly is the Control Room Manager. In the event this person leaves Stockport Homes Group, or their role significantly changes, a new Single RTC will be delegated this authority.

7.14 It is agreed between GMP and SMBC (and its appointed contractor Stockport Homes) that all CCTV operators employed by Stockport Homes Group, who will be working in the Control Room and operating the Airwave Radios, will be appropriately vetted by GMP – by completing an NPPV Security Assessment Form, an official ID check and each person will be required to sign an undertaking of confidentiality form which covers the use of the Airwave Radio system, which is approved by the Control Room Manager

7.15 At no time will any unauthorised person be granted operational access to the Airwave Radio System. Any authorised visitors or contractors who visit the control room to undertake a specific role will be supervised at all times and they will not be granted any operational access to the Airwave Radio System.

7.16 Maintenance and repairs of the Airwave Radio System will only be undertaken by approved contractors who are acting on behalf of GMP.

8 Data

8.1 The CCTV system will only hold data for the purposes specified and staff can only disclose information to people or agencies as defined within this Code of Practice.

Personal Data

8.2 Electronic personal data is stored in the form of:

- Visual recordings
- Name, emergency contact number and date of birth for all tenants in receipt of the Home Security Service.

8.3 All personal information stored should be accurate and of a good quality admissible in a Court of Law. Storage of data should follow guidelines laid down by the Data Protection legislation.

Recorded Material

8.4 Stockport Homes Limited acting in the capacity as Data Processor on behalf of Stockport Metropolitan Borough Council or Data Controller where relevant are authorised to provide evidence to authorised persons or organisations for all systems monitored.

8.5 Recorded material will only be used for purposes defined in this Code of Practice.

8.6 No information processed by the cameras will be sold in any form to any outside agency for commercial, documentary or entertainment purpose.

Use of Removable Media

8.7 Data will be stored on hard drives and retained for a maximum of 31 days before it is automatically over-written.

8.8 Data required for evidential purposes is recorded onto a “write once, read only” disc (Master Copy) or onto a removable media device provided by the requesting organisation, following proper authorisation. Evidential data should be copied within this timeframe to ensure it is available and not overwritten.

8.9 ‘Workable’ copies of data can be made to a Disc or removable media device. Once the copy has been made and issued, storage of the data reverts back to using the hard drive.

8.10 Under Data Protection legalisation members of the public have the right to obtain a copy of their personal data as well as other supplementary information.

8.11 The Information Governance Policy describes the SHG’s approach to such requests for information. Requests for information are dealt with under the relevant legalisation (Freedom of Information Act/Data Protection Legalisation).

8.12 Requests for information should be directed to the Assurance Team (assurance@stockporthomes.org).

9 Sharing Data with other SHG Staff Members

9.1. The Control Room may need to provide data/information captured by the CCTV system to specified roles associated with the investigation of crime and anti-social behaviour such as Neighbourhood Housing Managers and Neighbourhood Housing Officers - in relation to neighbourhood management function. The Safer Neighbourhood Team in relation to investigation of anti-social behaviour case investigation to establish individuals and the events captured related to tenancy management. The SHG Reception Management

Team – for the purposes of assisting an incident involving a member of staff who was subjected to an incident against them.

9.2 All requests for data/information must be requested using the CCTV Request Form, clearly stating the reason for the request.

9.3 Any footage that relates to potential criminal activity must be shared with the Police in accordance with the provision of the Police & Criminal Evidence Act 1984.

9.4 Where there are concerns over a request, the final decision as to whether the request will be fulfilled lies with the Head of Service, Control Room Manager, or in their absence another member of the Control Room Management Team i.e. Team Leader

Sharing data with other agencies

9.5 Access to data may be given:

- In connection with civil disputes were ordered by the Courts or in accordance with the provisions of the Civil Evidence Act 1995.
- To solicitors acting for defendants or victims in connection with criminal proceedings. Footage can be requested if the defendant or victim is a data subject. Such requests should be made in writing and directed to the CCOM who will authorise this with the Assurance Manager.
- To Stockport Council in connection with legal or civil action being taken regarding nuisance/ anti-social or criminal behaviour , or as part of an internal investigation to substantiate fact relating to a reported incident where footage is available from the CCTV system.
- In some circumstances, approval for access to those not listed above may be given by the Control Room Manager and Emergency Planning Manager.

Sharing Data with the Police

9.6 Where requests are made for footage from the Police that relates to the detection/prevention of crime or disorder, this can be shared with the Police in line with the Police and Criminal Evidence Act. Details of the requesting officer and the incident must be recorded on the dedicated GMP CCTV requests log, on the dedicated Share Point site (Media Handover Log).

Exemptions of the Provision of Information

9.7 Data Protection legislation recognises that it is sometimes appropriate to disclose personal data for certain purposes in relation with criminal justice. In these cases, individuals' rights may occasionally need to be restricted.

9.8 In particular, the Act deals with several situations in which personal data is processed for the following "crime purposes":

9.9 The prevention or crime and disorder.

9.10 The capture or prosecution of offenders.

Privacy of tenants

9.11 Cameras must not be used to look into residential property; this excludes surveillance of communal areas, pathways, roads, parking areas or service facilities such as lifts. Where the equipment permits it, digital privacy zones will be programmed into the system as required, in order to ensure that the interior of any private residential property within range of the system is not surveyed by the cameras.

9.12 Cameras adjacent to residential areas and properties will have electronic stops that will prevent intrusion of privacy, impact upon civil liberties and observations of private properties. Except wider angle, long distance or panning shots, every effort will be made to ensure that domestic premises are not included within camera's field of view in order to preserve personal privacy.

9.13 Cameras will be operated with due regard to the privacy of individuals and ad hoc spot checks will be made on staff operating the CCTV system.

9.14 Maintaining the privacy of the Public and Stockport Homes' tenants is a key priority for Stockport Homes and relevant DPIA's (Data Protection Impact Assessments) have been developed to ensure the appropriate use of the CCTV network, which does not infringe on or become detrimental to a person's right to privacy. A copy of Stockport Homes' DPIA's can be found on its website.

10 Equipment – Cameras

10.1 The design and installation of the CCTV System will be overseen by the Control Room Manager and technical consultants, taking account of the needs of the community and visitors and in liaison with the Police and other agencies as appropriate. The location of cameras will be co-ordinated to maximise coverage.

10.2 A maintenance agreement is in place with an approved Contractor who will attend critical faults within four hours of reporting

10.3 All CCTV cameras are not capable of recording sound.

10.4 In order to enhance public confidence in the system, dummy cameras will only be used when installed at the request by the Safer Neighbourhood Team, in line with the Safer Neighbourhoods Policy.

Placement of cameras

10.5 The cameras will be prominently placed in fixed positions within public view to obtain the best views for detection, to deter crime and anti-social behaviour and to assist the public to feel safer.

Camera capability

10.6 All cameras have high resolution colour capabilities to enhance images for easier identification, to aid detection of offences and ASB and to improve evidential material. Moveable dome cameras pan up to 360 degrees and tilt to required angles. Cameras will be maintained to operate efficiently at night and in poor lighting conditions.

Remote control of the cameras

10.7 All moveable dome cameras are remote controlled from the Control Room. Cameras have automatic movement when not being operated manually and also have an auto park facility which returns the camera to a home position.

11 Signage

11.1 The public must be made aware of CCTV in operation to gain their understanding and acceptance. The following principles are adopted:

11.2 Signs are displayed at key points clearly stating that a CCTV system is in operation

11.3 Signs specify the general area that the system covers

11.4 Signs clearly specify who is the responsible body for the CCTV.

12 Security

Maintaining security of the Control Room and Viewing Room

12.1 SHG has in place security measures to prevent unauthorised or accidental access for the purpose of alteration, disclosure, or loss and destruction of information.

12.2 The hard drive will be secured through password protection.

12.3 Removable media CDs and DVDs will be stored in a lockable cabinet within the Control Room.

12.4 The Control Room and Viewing Room will be kept secure at all times and arrangements include:

12.5 Records are kept of all access to the Control Room and Viewing Room, recording details of the individual concerned and the times of arrival and departure

12.6 The playback system will be password protected and only those granted access are provided with this

12.7 Access to the Control Room and the Viewing Room will be restricted to specified persons who have been granted permission.

12.8 Technical repairs will be carried out in controlled circumstances according to the maintenance arrangements in place

12.9 Police visits will usually be prearranged and always recorded as with other visits

Major incidents

12.10 In the event of a major incident, the Business Continuity Plan shall be activated between staff, the Control Room Manager, the Police, other emergency services and SHG's Management Team.

12.11 Should the Control Centre need to be evacuated, the GDX monitor will be switched to 'monitor' mode. This will automatically override the doors and send the intercom directly to the flat rather than the Control Centre. The CCTV will continue to record direct to the server and Reflex will be instructed to carry out a full check of the CCTV backups. No recordings should be lost as long as power supply is not affected at the recording sites. Within Cornerstone, there is an uninterrupted power supply of up to eight hours in the event of a power failure.

13 Police use of the System

13.1 Police use of the System must be in accordance with the Code of Practice and the Regulation of Investigatory Powers Act (RIPA) and the Police and Criminal Evidence Act (PACE).

13.2 On occasion, the Police may request to use or takeover the control of the CCTV System to view live images to monitor a serious incident.

13.3 If Police request access to live images, they must provide an application for the Use of Directed Surveillance under R.I.P.A (Regulation of Investigatory Powers Act.). This must be signed by a Superintendent or someone of a more senior rank and approved by the Control Room Manager or someone of a more senior position.

14 Police Access to Data

14.1 The Police may apply for access to specific data in accordance with the agreement made with the Control Room Manager and where the Police reasonably believe that access to the said data is necessary for an investigation.

14.2 Data provided to the Police shall at no time be used for anything other than the purpose specified and identified when the data is released by the Control Room.

14.3 The Police can request to take possession of the original hard drive when a serious incident has occurred. Removal of the original hard drive must be authorised by the Control Room Manager. In the absence of the Control

Room Manager, authorisation can be given by the Head of Safer Neighbourhoods

14.4 In cases of the Police requiring large amounts of footage, a secure hard drive will be provided by the Police to store the footage.

15 Requests Outside of the Code of Practice

15.1 Requests from the Police for use of the CCTV System in any manner that is not provided for by the Code of Practice, must be the subject of a specific agreement between the Head of Safer Neighbourhood Team and the Police prior to the use of the system, with the reason for the request stated in writing.

16 Recording the Use of the System

16.1 When footage is downloaded to DVD as per the request of the Police, a copy must be filed onto the hard drive. Where necessary, a 'Master Copy' should be provided which is not altered in any way after the first write. A working copy should also be provided, to enable Police to take stills or add information to the disc.

16.2 When controlling the CCTV system, the Police must supply a copy of an application for the Use of Directed Surveillance under R.I.P.A. which is secured in the Control Room for future audit.

16.3 Records with the same details are also retained by the Police. If monitoring is taking place by both the Control Room and the Police, recording will only be carried out by the Control Room to avoid creation of two sets of recordings.

17 Changes to the Code

17.1 Major changes to the Code of Practice will only be made after appropriate consultation with relevant interested groups and will be reviewed in line with regulatory changes.

18 Internal Controls

1	Version control	Version number will change every three years or at major review	
	Version No.	Date	Change/s and reasons for change
	1	February 2025	3 yearly review

2	Policy Owner i.e. Executive Director	Director of Customer Services
	Policy Author/s i.e. Head of Service	Control Room and Emergency Planning Manager
	Consultation	February 2025 – SMBC who is data owner
	Approved by/date Directorate Management Meeting	Customer Services Directorate Management Meeting - 11 th February 2025 – Decision
	Effective Date - the date of sign-off	11 th February 2025
	Next Full Review Date i.e. 3 years after effective date, with an annual light touch review	10 th February 2028

3	Regulatory Standards	Please list the Consumer, Governance, Viability standards and outcomes this policy meets
	Standard/s / Legislation	Required outcome
	Neighbourhood and Community Standard	<p><u>1.3 Anti-social behaviour and hate incidents</u></p> <p>1.3.1 Registered providers must work in partnership with appropriate local authority departments, the police and other relevant organisations to deter and tackle anti-social behaviour (ASB) and hate incidents in the neighbourhoods where they provide social housing.</p> <ul style="list-style-type: none"> Registered providers must have a policy on how they work with relevant organisations to deter and tackle ASB in the neighbourhoods where they provide social housing. Registered providers must clearly set out their approach for how they deter, and tackle hate incidents in neighbourhoods where they provide social housing.

	<ul style="list-style-type: none"> Registered providers must enable ASB and hate incidents to be reported easily and keep tenants informed about the progress of their case. Registered providers must provide prompt and appropriate action in response to ASB and hate incidents, having regard to the full range of tools and legal powers available to them. Registered providers must support tenants who are affected by ASB and hate incidents, including by signposting them to agencies who can give them appropriate support and assistance. <p><u>1.4 Domestic Abuse</u> Registered providers must have a policy for how they recognise and effectively respond to cases of domestic abuse.</p>
Data Protection 2018	Compliance with information management; sharing, storage, authorised access to CCTV
Protection of Freedoms Act 2012	Ensure our CCTV is viable and justified with Data Protection impact Assessments – reviewed every 12 months with relevant authorities. Ensure adequate signage and CCTV is not used for any other purpose than to prevent and detect, ASB and Criminality for the purposes of investigation criminally or civil. Data Release Agreement underpins this process.
GDPR 2018	Retention of images in accordance with GDPR for investigation and routine review
Freedom of Information Act 2000	Management of who we release personal and non-personal to. Liaise with SHG and SMBC IG Teams in retrieving and providing information accordingly.

4	Linked policies/strategies	
	Standard Operating Procedures	<p>Sets out the clear function of the control, regarding processes and responsibilities and how to respond to requests/incidents on a day-to-day basis:</p> <ul style="list-style-type: none"> • Safer Neighbourhoods Policy and Procedure • CCTV Code of Practice • ASB Strategy • Hate Policy • Domestic Abuse Policy • Hate Policy • Domestic Abuse Policy
	Data Release Agreement	Stipulates the use of data, who it is released to, how and the logging and audit of any data processed.

5	Equality, diversity and inclusion	Describe how different experiences, characteristics, and approaches were considered during the formulation of the policy, e.g. neurodiversity, age, religion, sex/gender, financial/digital inclusion.
		There are no adverse differential impacts upon Customers or Colleagues as a result of the Code of Practice

6	Customer/Colleague Voice	Describe how the customer and/or colleague voice shapes and influences the policy and services
		February 2025 – SMBC who is data owner

7	Risk management	This Code of Practice helps to mitigate the following risks identified on the Corporate Risk Register
	Corporate Risk 2	SHG does not maintain a strong, positive reputation where stakeholders have trust and confidence in SHG)
	Corporate Risk 3	Positive, strategic relationships are not maintained with Stockport Council (at both officer and political level) and other key local partners / third sector organisations across Greater Manchester (GM)
	Corporate Risk 6	SHG does not deliver excellent customer services in the way that customers require them.
	Corporate Risk 11	SHG does not have confidence in data quality and integrity and do not have a robust performance management framework that generates valuable insight for leaders

8	Performance monitoring	Please list the relevant government TSMs (Tenant Satisfaction Measures)
		The successful delivery of this Code of Practice has a direct impact on TSM Satisfaction: TP12 - Satisfaction with approach to ASB.