

Self assessment tool

How well does your organisation comply with the 12 guiding principles of the surveillance camera code of practice? Complete this easy to use self assessment tool to find out if you do.

Using this tool

This self assessment tool will help you and your organisation identify if you're complying with the principles in the code. It should be completed in conjunction with the [surveillance camera code of practice](#). The tool will help you show how well you comply with each principle. It is possible to be largely compliant with some principles and to fall short against others. As a result you will note that at the end of the questions against each principle there is a space to include an action plan. This is to enable you to put actions in place over the next year to improve your compliance to that principle. These boxes can also be used to make a note of what evidence you could produce if required to show your compliance to that principle.

The document contains a combination of open and closed questions. For the open questions there is a limit on how much you can write, so please feel free to include any additional notes as an annex to the document – there are additional blank pages at the end of the tool.

We do not want you to send the self assessment response to us. However, in the interest of transparency we encourage you to publish the self assessment on your website.

The self assessment is for you to satisfy yourself and those that you surveille that you meet the principles and identify any additional work to show compliance.

We would like you to let us know that you have completed this document as this will enable us to understand the level of uptake. Also please let us know if you will be interested in working towards certification against the surveillance camera code of practice in the near future or just be added to our mailing list.

This is the first edition of the self assessment tool which will evolve over time. Please forward any feedback to scc@sccommissioner.gsi.gov.uk

Principle 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.

1. Have you translated principle 1 into clear objectives? Yes No
If so what are they?

ÄThe Scheme will be operated fairly, within the law, and only for the purposes for which it was established or which are subsequently agreed in accordance with our Code of Practice.

ÄThe scheme will be operated with due regard to the principle that everyone has the right to respect for his or her private and family life and their home.

2. Do you regularly review the system and assess against the objectives? Yes No

3. Have you considered the requirement of the end user? Yes No

4. Is the system being used for any other purpose other than those specified? Yes No

If so please explain

5. Have you identified any areas where further action is required more fully conform with the requirements of Principle 1?

Action plan

The council operates closed circuit television systems within open plan and multi-storey car parks. The council has appointed Eurolink Security Installations Limited as its primary contractor with regard to the design, installation and maintenance of the CCTV systems. Eurolink Security Installations is an National Security Inspectorate (NSI) Gold standard, Quality Assured company with regard to CCTV installations. The company is currently undertaking a total upgrade of the CCTV systems. Each of the systems will be upgraded to fully compliance with ISO EN50132-7, NCP104 and all relevant codes of practice. Therefore the upgrades will meet the requirements of the Data Protection Act and the requirements of the Surveillance Camera Commissioner. At the conclusion of the works each individual site will be issued with an "As Installed" specification, compliant with the standard and relevant operational codes of practice. The works are being undertaken in consultation with the contractor and all relevant stakeholders. Since the works will meet the EN50132-7, NCP104 standard the systems will be fully compliant. Ongoing compliance will be ensured by six (6) monthly preventative maintenance visits and system reviews. An example of such a review is that the procedure with regard to data retrieval from the hard drive unit is currently under review. The current installation work and system reviews will be completed by 1st July 2016.

Principle 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.

1. Do you review your system annually? Yes No
2. Have you conducted a privacy impact assessment?
(The ICO has produced a PIA code of practice and the SCC has a template you can use if required) Yes No
3. Do you publish your privacy impact assessment and annual review? Yes No
4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 2?

Action plan

It is a condition that the Contractor Eurolink Security Installations Limited complies with the privacy impact assessment. As part of the current upgrade of the CCTV systems privacy will be ensured by:

- a) Physical stops being fitted to pan, tilt and zoom cameras thereby ensuring that the obtainable field of view meets the design requirements, and does not breach the privacy requirement, i.e. the cameras cannot be zoomed into for example private dwellings bordering the carparks.
- b) Should the need arise electronic masking technology will be used with regard to the pan, tilt and zoom cameras to ensure compliance with the privacy requirement.
- c) As an ongoing process the field of view of each camera will be confirmed during the course of the preventative maintenance visits which are carried out at six (6) monthly intervals in accordance with the requirements of EN50132-7, NCP 104 and the NACOSS Codes of Practice.

Principle 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.

1. Does signage exist highlighting the use of surveillance cameras? Yes No
2. Does the signage highlight the point of contact? Yes No
3. Has there been proportionate consultation and engagement with the public and partners to establish that there is a legitimate aim and a pressing need for the surveillance camera system? Yes No
4. Is the surveillance system a proportionate response? Yes No

5. Does your publication of information include the procedures and safeguards that are in place, impact assessments undertaken, performance statistics and other management information? Yes No
6. Do you have a complaints procedure in place? Yes No
7. Do you make the public aware of how to escalate complaints? Yes No
8. Is there a defined time scale for acknowledging and responding to complaints and is this conveyed to the complainant at the outset? Yes No
9. Do you publish the number and nature of complains received? Yes No
10. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 3?

Action plan

As previously stated the Car Park CCTV is being reconfigured to ensure compliance with EN50132-7, NCP104 and NACOSS Codes of Practice, and all relevant standards and requirements including that of the Data Protection Act and the Surveillance Camera Commissioner. The works currently being undertaken will be completed by the 1st July 2016.

Whilst signage is in place it needs to be updated to reflect the requirements of the relevant Codes of Practice and Standards including first point of contact details etc. This work is in hand and will be completed by the 1st July 2016.

As installed system specifications and documentation as required by the relevant standards and codes of practice will be completed by the 1st July 2016.

Principle 4

There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.

1. What arrangements are in place to provide clear responsibility and accountability?

Compliance with the requirements of EN50132-7 NCP 104 and third party auditing via the National Security Inspectorate. Compliance with local operating procedures and protocols.

2. Are all staff aware of their responsibilities? Yes No

3. Please explain how you ensure the lines of responsibility are adhered to.

Compliance with EN50132-7, NCP104 and the Councils documented procedures. Third party auditing via the National Security Inspectorate.

4. If jointly owned, is it clear what each partner organisation is responsible for and what the individual obligations are? Yes No

5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 4?

Action plan

As previously stated the systems are being upgraded to ensure compliance with EN50132-7, NCP104 and the Councils documentation is being reviewed and amended as requires. This work will be completed by the 1st July 2016.

Principle 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.

1. Do you have clear policies and procedures which help ensure that any legal obligations affecting the use of such a system are addressed? Yes No

If so please specify.

All policies, standards and operating procedures are being reviewed to ensure full compliance. This review will be completed by the 1st July 2016.

2. Do you follow a quality management system? Yes No
If so please specify.

The council does not operate a quality management system. However closed circuit television is not a primary function of the council. Therefore the council has appointed Eurolink Security Installations with regard to the installation, maintenance and compliance issues relating to CCTV. Eurolink Security Installations is an ISO 9001 quality assured company with an approved quality assured manual and operating procedures manual relevant to the installation and

3. Are the rules, policies and procedures part of an induction process for all staff? Yes No

4. How do you ensure that all system users remain up to date and efficient with relevant operational, technical, privacy considerations, policies and procedures?

By compliance with the organizational training plan. Compliance with the maintenance requirement in accordance with EN50132-7, NCP104. By the receipts of technical update bulletins via the NSI, and by regular management review meetings.

5. Have you considered qualifications relevant to the role of the system users, such as the National Occupational Standard for CCTV operations or other similar? Yes No

6. If so, have any of your system users undertaken any occupational standards to date? Yes No

7. Do your system users require SIA licenses?
(Please see SIA website: www.sia.homeoffice.gov.uk) Yes No

8. If staff do not need a license, how do you ensure they have the necessary skills and knowledge to use or manage the surveillance system?

All relevant staff will receive on site and office based training, conducted by our approved CCTV systems contractor. Courses operated by NSI support service and Tavcom training are currently under review. Relevant staff will have received training by the 1st July 2016.

9. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 5?

Action plan

Will work with our partners and stakeholders to ensure there is a joint training protocol and approved operating procedures in place.

Principle 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.

1. On what basis are images retained and for how long?

The systems have been designed and installed in accordance with EN50132-7, NCP104. The systems are fully automatic after twenty eight (28) days the images are automatically deleted from the hard drive unit. Twenty eight (28) days was decided as a time period due to the Police requirement with regard to image retrieval in respect of a criminal act.

2. Do you have an auditable process for reviewing images and managing their retention? Yes No
3. Are there any time constraints in the event of the enforcement agency not taking advantage of the opportunity to view the retained images? Yes No
4. Are there any time constraints which might affect external parties from viewing the images? Yes No
5. Do you quarantine all relevant information and images relating to a reported incident until such time as the incident is resolved and/or all the information and images have been passed on to official third parties? Yes No
6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 6?

Action plan

The council operates closed circuit televisions systems within open plan and multi-storey car parks. The council has appointed Eurolink Security Installations Limited as its primary contractor with regard to the design, installation and maintenance of the CCTV systems. Eurolink Security Installations is an National Security Inspectorate (NSI) Gold standard, Quality Assured company with regard to CCTV installations. The company is currently undertaking a total upgrade of the CCTV systems. Each of the systems will be upgraded to fully compliance with ISO EN50132-7, NCP104 and all relevant codes of practice. Therefore the upgrades will meet the requirements of the Data Protection Act and the requirements of the Surveillance Camera Commissioner. At the conclusion of the works each individual site will be issued with an "As Installed" specification, compliant with the standard and relevant operational codes of practice. The works are being undertaken in consultation with the contractor and all relevant stakeholders. Since the works will meet the EN50132-7, NCP104 standard the systems will be fully compliant. Ongoing compliance will be ensured by six (6) monthly preventative maintenance visits and system reviews. An example of such a review is that the procedure with regard to data retrieval from the hard drive unit is currently under review. The current installation work and system reviews will be completed by 1st July 2016.

Principle 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.

1. Do you have a policy on who has access to the stored information? Yes No
2. Do you have a policy on disclosure of information? Yes No
3. What checks do you have in place to ensure that the disclosure policy is followed?

The compliance with regard to disclosure is currently under review, thereby ensuring that compliance is dealt with in a robust manner.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 7?

Action plan

Whilst a disclosure policy is in place, the policy is currently under review. This policy is currently being reviewed by the Council, Contractor and relevant Stakeholders. This will be completed by the 1st July 2016.

Principle 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.

1. What approved operational, technical and competency standards relevant to a surveillance system and its purpose does your system meet?

All systems are compliant with EN50132-7, NCP104 and the NACOSS Codes of Practice.

2. How do you ensure that these standards are followed appropriately?

The systems are compliant with EN50132-7, NCP104. The systems are maintained and reviewed at six (6) monthly intervals in accordance with the requirements of the standard. The systems are subject to third party inspection ensuring compliance by the National Security Inspectorate.

3. What steps are in place to secure certification against the approved standards?

The systems are compliant with EN50132-7, NCP104. The systems are maintained and reviewed at six (6) monthly intervals in accordance with the requirements of the standard. The systems are subject to third party inspection ensuring compliance by the National Security Inspectorate.

4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 8?

Action plan

There is a need for further staff training. This is being implemented via our contractor Eurolink Security Installations Limited and will be completed by the 1st July 2016.

Principle 9

Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

1. What security safeguards do you have in place to ensure the integrity of images and information?

The images stored on the hard drive at each camera location are first generation images which have been generated in accordance with the provisions of ISO EN50132-7, NCP104. The images therefore are of evidential quality. Access to the images is password protected and the system has a dedicated broad-band line at each location. The images therefore at no time are transmitted via the councils dedicated private network. Access to the images is currently restricted to two (2) council operatives and authorized persons employed by our contractor

2. If the system is connected across an organizational network or intranet, do sufficient controls and safeguards exist? Yes No

3. What is the specified purpose for which the information are being used and accessed and is this consistent with the stated purposes?

The systems image and data retrieval is via a dedicated internet broad-band line. Images are retrieved via a dedicated piece of network viewing software which is password protected. The system is for the purpose of crime prevention and public safety. The system cannot be accessed by anyone other than authorised users.

4. Do you have preventative measures in place to guard against misuse of information and images? Yes No

5. Are your procedures and instructions and/or guidelines regarding the storage, use and access of surveillance system information documented? Yes No

6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 9?

Action plan

New procedures relating to data retrieval and storage are currently under discussion between the Council, Eurolink Security Installations and Stakeholders. The outcome of the review will be more robust policies, training and implementation. This review will be completed by the 1st July 2016.

Principle 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.

1. Does your system have a review process that shows it still addresses the needs and delivers the benefits that justify its use? Yes No
2. Have you identified any cameras that do not remain justified in meeting the stated purpose(s)? Yes No
3. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras? Yes No

If so please provide brief details.

A review is currently being undertaken with regard to the viability of each camera position and compliance with the outline design proposal prepared in accordance with EN50132-7, NCP104. Consultation is taking place between the Council, Eurolink Security Installations and relevant Stakeholders.

4. Is it cost effective to continue running your surveillance camera system? Yes No
5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 10?

Action plan

A review is currently being undertaken with regard to the viability of each camera position and compliance with the outline design proposal prepared in accordance with EN50132-7, NCP104. Consultation is taking place between the Council, Eurolink Security Installations and relevant Stakeholders.

Principle 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.

1. Are the images and information produced by your system of a suitable quality for the criminal justice system to use without enhancement? Yes No
2. During the production of the operational requirement for your system, what stakeholder engagement was carried out or guidance followed to ensure exported data would meet the quality required for it to be used for evidential purposes?

System under new management. As part of review it was identified as no longer being fit for purpose. Investment in a new system will ensure there will be clarity and suitability of evidence

3. Do you have safeguards in place to ensure the forensic integrity of the images and information including a complete audit trail? Yes No
4. Do you have a policy on data storage, security and deletion? Yes No
5. Is the information stored in a format that is easily exportable? Yes No
6. Does the storage ensure the integrity and quality of original recording and the meta data? Yes No
7. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 11?

Action plan

A programme of phased continued improvement is in place, thereby ensuring that older equipment is updated and the integrity and quality of recorded images meets the current standard and are of evidential quality.

Principle 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.

1. Do you use any specialist technology such as ANPR, facial recognition, Body Worn Video (BWW) or remotely operated vehicles (Drones)? Yes No

If so, please specify.

The council does not operate directly any specialist technology.

2. Do you have a policy in place to ensure that the information contained on your database is accurate and up to date? Yes No

3. Do you have a procedure for deciding when and whether an individual or vehicle should be included in a reference database? Yes No

4. What policies are in place to determine how long information remains in the reference database?

The council does not operate directly any specialist technology.

5. Are all staff aware of when surveillance becomes covert surveillance under the Regulation of Investigatory Powers Act (RIPA) 2000? Yes No

6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 12?

Action plan

The council does not operate directly any specialist technology.

Additional Information

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