

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 has been prepared by the Surveillance Camera Commissioner (SCC) to help you and your organisation identify if you're complying with the [Surveillance Camera Code of Practice](#) (the Code). It should be completed in conjunction with the Code, and can help to show you how well you comply with each of its 12 guiding principles.

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 so you can 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 template contains a combination of open and closed questions. For the open questions, there is a limit on how much you can write within the template, 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 to help you to do so.

Remember that your organisation may operate more than one surveillance camera system, with a scope that extends across several purposes and many geographical locations. So, before you start clarify the scope of the system(s) you propose to self assess for compliance against the Code.

Is this tool for me?

The self assessment tool is aimed primarily at relevant authorities under [Section 33 of the Protection of Freedoms Act 2012](#) who have a statutory duty to have regard to the guidance in the Code. In general terms, this means local authorities and the police in England and Wales.

If you work within any other organisation that operates surveillance camera systems you are free to adopt and follow the principles of the Code on a voluntary basis. If you decide to do so, then using this tool will be of benefit to you.

As a relevant authority under Section 33, if you are considering the deployment of a new surveillance camera system, or considering extending the purposes for which you use an existing system, you may find the more [detailed three stage passport to compliance tool a valuable planning tool](#). It can guide you through the relevant principles within the Code and inform you of the necessary stages when planning, implementing and operating a surveillance camera system to ensure it complies with the Code.

If you are from any other organisation operating a surveillance camera system you may find this template useful in reviewing your use of surveillance, or may want to use other SCC online tools such as the [Data Protection Impact Assessment](#) guidance or the [Buyers Toolkit](#) to help decide whether your surveillance is necessary, lawful and effective.


What should I do next?

The self assessment is for you to satisfy yourself and the subjects of your surveillance that you meet the 12 principles and to identify any additional work necessary to show compliance. Think about realistic timescales for completion of your action plans, with a view to achieving full compliance with the Code before undertaking your next annual review.

The SCC does not want you to submit your completed self assessment response to him. However, in the interest of transparency he encourages you to publish the completed self assessment tool template on your website.

A completed self assessment is also a positive step towards [third party certification](#) against the Code.

Email the SCC at scc@sccommissioner.gsi.gov.uk to let us know when you have completed this template as this will enable us to understand the level of uptake. We would also appreciate your comments and feedback on the user experience with this template. Please let us know if you are interested in working towards third party certification against the Code in the near future, or would like to be added to our mailing list.

Name of organisation	Northamptonshire Police
Scope of surveillance camera system	Multi camera cctv system on mobile speed enforcement vans
Senior Responsible Officer	Supt T Thompson
Position within organisation	Operations Superintendent
Signature	
Date of sign off	28/04/21

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. What is the problem you face and have you defined a purpose in trying to solve it? Have you set objectives in a written statement of need?

Mobile Enforcement vans detect various offences. When incidents occur clear and detailed evidence is vital in assisting with investigations. There is a need to provide best evidence of vehicles and their occupants. Whilst there is an expectation that officers provide accurate written records of incidents, visually recorded evidence can often prove an accurate record of an incident and provide mitigation against challenges.

Therefore these systems provide an open and transparent view of the incident which is disclosable.

The system also provides additional safety and security for the operators, recording interactions and approaches from members of the public.

This footage is stored alongside video recorded by Home office type approved equipment exempted under section 20.

Visually recorded evidence is seen by the Government, Police and Crime Commissioners and the Police as a vital tool in the fight against crime, and an opportunity to be more open and transparent with the community. The devices are sought to be used primarily for the prevention and detection of crime and are well placed to capture a range of incidents including but not limited to Road traffic offences (1988 Act), Construction and Use offences (1986 Act) alongside other offences such as Public Order (1986 Act) as well as any other offence which fall under the criminal law act.

2. What is the lawful basis for your use of surveillance?

The footage will be used for the prevention and detection of crime as well as providing best evidence in any ongoing police investigation. The human rights act has been considered in relation to the placement of the cameras. There is also a consideration under the regulation of investigative powers act. However as the devices are fitted to marked police vehicles recording in public places then the surveillance cameras do not fall under the act.

3. What is your justification for surveillance being necessary and proportionate?

The footage is used in marked vehicles where there is a public expectation for evidence of the highest quality to be captured. This data will be retained at the direction of the management of police information guidance and force policy. The marked police vehicles will display signage to show presence of video recording. The cameras will be used to

record specific enforcement sessions and will not be used to complete direct surveillance on a person, community or for roles such as MAST (mobile armed surveillance teams) The necessity of this recording is to capture best evidence of offences taking place. To maximise the quality of evidence offered to the court to support any prosecutions.

4. Is the system being used for any other purpose other than those specified? If so please explain.

Yes

No

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

Action Plan

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. Has your organisation paid a registration fee to the Information Commissioner's Office and informed them of the appointment of a Data Protection Officer (DPO) who reports to the highest management level within the organisation? Yes No

2. Are you able to document that any use of automatic facial recognition software or any other biometric characteristic recognition systems is necessary and proportionate in meeting your stated purpose? Yes No

3. Have you carried out a data protection impact assessment, and were you and your DPO able to sign off that privacy risks had been mitigated adequately? Yes No

Before May 2018 the requirement was to complete a privacy impact assessment; this has been replaced by a data protection impact assessment. There is a surveillance camera specific template on the Surveillance Camera Commissioner's website:

<https://www.gov.uk/government/publications/privacy-impact-assessments-for-surveillance-cameras>

4. Do you update your data protection impact assessment regularly and whenever fundamental changes are made to your system? Yes No

5. How have you documented any decision that a data protection impact assessment is not necessary for your surveillance activities together with the supporting rationale?

This assessment is currently being completed.

6. Have you identified any areas where action is required to conform more fully with the requirements of Principle 2? Yes No

Action Plan

Complete the Data protection impact assessment with information unit.

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.

7. Has there been proportionate consultation and engagement with the public and partners to assess whether there is a legitimate aim and a pressing need for the system? Yes No

8. Does your Privacy Notice signage highlight the use of a surveillance camera system and the purpose for which it captures images? Yes No

9. Does your signage state who operates the system and include a point of contact for further information? Yes No

10. If your surveillance camera systems use body worn cameras, do you inform those present that images and sound are being recorded whenever such a camera is activated? Yes No

11. What are your procedures for handling any concerns or complaints?

All Complaints will be treated in the standard manner as laid out in policy. Complaints can be dealt with by department supervisors, Professional standards departments and the IOPC. The review can have a number of actions from "No Further Action" through to court and misconduct proceedings. There will also be complaints at a command level in relation to the ongoing use of the CCTV equipment. To support this there will be a clearly defined standard operating procedure detailing usage and in particular reference to the Human Rights Act. Any request for footage is dealt with by the information unit.

12. Have you identified any areas where action is required to conform more fully with the requirements of Principle 3? Yes No

Action Plan

Principle 4

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

13. What governance arrangements are in place?

A Policy and SOP governing the use and retention of captured footage will be adhered to at all times. Current practice is in line with that of Bodyworn Video where by officers activate the recording at the start of their enforcement session. Downloading any relevant evidence at the end of the session to be exhibited alongside the evidence from the Section 20 system. This is then stored securely and kept for the required time specified under MOPI.

14. Do your governance arrangements include a senior responsible officer?

Yes

No

15. Have you appointed a single point of contact within your governance arrangements, and what steps have you taken to publicise the role and contact details?

Yes

No

Guidance on single point of contact: <https://www.gov.uk/government/publications/introducing-a-single-point-of-contact-guidance-for-local-authorities/introducing-a-single-point-of-contact>

Contact would be made via the Safer Roads Team.

16. Are all staff aware of the roles and responsibilities relating to the surveillance camera system, including their own?

Yes

No

17. How do you ensure the lines of responsibility are always followed?

Clear communication to staff who use vehicles fitted with recording equipment. Line managers to dip sample footage. Professional Standards aware of usage and policy around recording devices. All evidential footage and process of this will be documented in statements as per evidential chains. All persons using the recording systems are required to have completed the training for this system.

18. If the surveillance camera system is jointly owned or jointly operated, is it clear what each partner organisation is responsible for and what the individual obligations are?

Yes

No

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

Yes

No

Action Plan

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.

20. Do you have clear policies and procedures in place to support the lawful operation of your surveillance camera system? If so, please specify. Yes No

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

22. How do you ensure continued competence of system users especially relating to relevant operational, technical, privacy considerations, policies and procedures?

Officers will be trained on the system, usage and legalities around the use of the system. Copies of both the SOP and Policy are available to all.

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

24. If so, how many of your system users have undertaken any occupational standards to date?

25. Do you and your system users require Security Industry Authority (SIA) licences? Yes No

26. If your system users do not need an SIA licence, how do you ensure they have the necessary skills and knowledge to use or manage the surveillance system?

As above this forms part of initial training which all officers using the equipment will receive.

27. If you deploy body worn cameras, what are your written instructions as to when it is appropriate to activate BWV recording and when not?

This assessment related to Multi camera cctv system on mobile speed enforcement vans. It will only be used whilst enforcement is being conducted. SOP and policy detail this requirement for everyone to be clear.

28. If you deploy surveillance cameras using drones, have you obtained either Standard Permission or Non-Standard Permission from the Civil Aviation Authority and what is your CAA SUA Operator ID Number?

Yes

No

N/A

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

Yes

No

Action Plan

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.

30. How long is the period for which you routinely retain images and information, and please explain why this period is proportionate to the purpose for which they were captured?

Data will be retained in line with MoPI guidelines with footage involving court proceedings up to seven years. Non-evidential footage will not be retained.

31. What arrangements are in place for the automated deletion of images?

There are currently 2 versions of the system in use, one of which only holds data for a rolling 72 hours. The Second is a rolling period of approximately 30 days. Any footage to be retained is downloaded from the system and managed by our general retention policy.

32. When it is necessary to retain images for longer than your routine retention period, are those images then subject to regular review?

Yes

No

33. Are there any time constraints in the event of a law enforcement agency not taking advantage of the opportunity to view the retained images?

Yes

No

34. 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 the enforcement agencies?

Yes

No

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

Yes

No

Action Plan

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.

36. How do you decide who has access to the images and information retained by your surveillance camera system?

All data stored by Northamptonshire Police falls under the Data Protection Act and as such officers and staff are frequently reminded of the need for a policing purpose before accessing the footage. Northamptonshire Police monitors all computer systems so breaches of this policy can be established. Footage of a sensitive nature or firearms incidents are restricted and can be cloaked if required.

37. Do you have a written policy on the disclosure of information to any third party?

Yes

No

38. How do your procedures for disclosure of information guard against cyber security risks?

Northamptonshire Police maintains a strong firewall and data storage is managed within ISO guidelines

39. What are your procedures for Subject Access Requests where a data subject asks for copies of any images in which they appear?

All matters of this nature are handled by the Legal / Professional Standards unit. Any application must complete a request to the force information unit who reviews each request and whether access should be given or not.

40. Do your procedures include publication of information about how to make a Subject Access Request, and include privacy masking capability in the event that any third party is recognisable in the images which are released to your data subject?

Yes

No

41. What procedures do you have to document decisions about the sharing of information with a third party and what checks do you have in place to ensure that the disclosure policy is followed?

As above data is managed by the information unit who ensure all checks and policies are adhered to.

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

Yes

No

Action Plan

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.

(There are lists of relevant standards on the Surveillance Camera Commissioner's website: <https://www.gov.uk/guidance/recommended-standards-for-the-cctv-industry>)

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

The system selected complies with The Surveillance Camera Commissioner current list of recommended standards. Footage is captured using a suitable device which is time and date stamped exhibited as an original and locked for editing unless masking / pixelation is required.
Officers receive guidance on the storage and retention of footage to ensure standards are met.

44. How do you ensure that these standards are met from the moment of commissioning your system and maintained appropriately?

Ongoing review of policy and procedures in relation to the usage and storage of data.

45. Have you gained independent third-party certification against the approved standards?

Yes

No

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

Yes

No

Action Plan

Principle 9

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

47. What security safeguards exist to ensure the integrity of images and information?

As listed above vehicles are standalone systems and all footage should be time stamped and stored securely with a password to mitigate the risk of data being stolen from vehicles. Police vehicles when not in use are kept in secure locations. Any evidential footage will be downloaded and secured following the conclusion of the incident to ensure no evidential data is kept on the systems within the vehicle for any longer than necessary.

48. If the system is connected across an organisational network or intranet, do sufficient controls and safeguards exist?

Yes

No

49. How do your security systems guard against cyber security threats?

Data is retained on a secure server with sufficient firewalls in place as per the force policy. or physicaly in a secure storage locker.

50. What documented procedures, instructions and/or guidelines are in place regarding the storage, use and access of surveillance camera system images and information?

In line with the force policy, data is captured and stored in an appropriate manner. It should only be accessed and viewed by persons who have a lawful and necessary reson to view it and any breach of this policy falls within a profesional standards matter.

51. In the event of a drone mounted camera being lost from sight, what capability does the pilot have to reformat the memory storage or protect against cyber attack by remote activation?

Not applicable

52. In the event of a body worn camera being lost or stolen, what capability exists to ensure data cannot be viewed or exported by unauthorised persons?

At present there is no way to prevent persons accessing the footage held on system if it is stolen. however, the device is very large and mounted within the enforcement vehicle. Due to the type of camera, the personal information held on the cameras will be minimal.

53. In reviewing your responses to Principle 9, have you identified any areas where action is required to conform more fully with the requirements? If so, please list them below.

Yes

No

Action Plan

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.

54. How do you review your system to ensure it remains necessary and proportionate in meeting its stated purpose?

Ongoing review by the Safer Roads Management team. Re-assessing the SOP and policy annually in line with any changes legally or within force to confirm the policy still complies and is fit for purpose.

55. Have you identified any camera locations or integrated surveillance technologies that do not remain justified in meeting the stated purpose(s)?

Yes

No

56. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras? (If so please provide brief details)

Yes

No

Not all of our fleet have this technology installed, those that do are better equipped to enforce routes heavily used by motorcycles to assist with the recording of the registration. Without the system in place, there are more challenges to what the officer records and in some cases incorrect numbers can be observed and written down.

57. How do your system maintenance arrangements ensure that it remains effective in meeting its stated purpose?

We only have a small number of units, any defects are raised with the supplier for repair. Where possible this would be done alongside maintenance of the enforcement equipment.

58. Have you identified any areas where action is required to conform more fully with the requirements of Principle 10?

Yes

No

Action Plan

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.

59. Are the images and information produced by your system of a suitable quality to meet requirements for use as evidence? Yes No

60. 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 requirements for evidential purposes?

Ongoing awareness from CPS. Continued process is the same as mobile enforcement footage in relation to use of footage in court. Identification of such footage must be highlighted on court files or traffic tickets etc.

61. Do you have safeguards in place to ensure the forensic integrity of the images and information, including a complete audit trail? Yes No

62. Is the information in a format that is easily exportable? Yes No

63. Does the storage ensure the integrity and quality of the original recording and of the meta-data? Yes No

64. Have you identified any areas where action is required to conform more fully with the requirements of Principle 11? Yes No

Action Plan

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.

65. What use do you make of integrated surveillance technology such as automatic number plate recognition or automatic facial recognition software?

The system will not use integrated surveillance technology or ANPR, they would be separate systems as they could interfere with the HOTA equipment we use.

66. How do you decide when and whether a vehicle or individual should be included in a reference database?

N/A

67. Do you have a policy in place to ensure that the information contained on your database is accurate and up to date?

Yes

No

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

N/A

69. Are all staff aware of when surveillance becomes covert surveillance under the Regulation of Investigatory Powers Act (RIPA) 2000?

Yes

No

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

Yes

No

Action Plan