# 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.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.

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| Name of organisation | Warrington Borough Council |
| Scope of surveillance camera system | Warrington Town Centre public space CCTV |
| Senior Responsible Officer | Lynton Green |
| Position within organisation | Deputy Chief Executive and Director of Corporate Services |
| Signature | |
| Date of sign off | 16.03.2020 |

## 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?

   To deter and help reduce the fear of crime and anti-social behaviour.
   To assist police to identify, apprehend and prosecute offenders by providing evidence.
   To secure a safer environment for those who live, work, trade and visit Warrington Town Centre.
   To assist our authority in its regulatory functions.
   All objectives are referenced in our CCTV code of practice.

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

   The introduction of the Crime and Disorder Act 1998 placed a direct responsibility on local authorities to combat crime and anti-social behaviour. The use of our CCTV system takes into account the effects on individuals and their privacy. All public Space CCTV is identified by signage, no cameras are installed in a covert manner and privacy zones are installed in any areas that are residential.

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

   CCTV is used as a proportional response to identified problems and is used only so far as is necessary for the prevention and detection of crime. A privacy impact assesment has been completed.

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?

N/A

6. Have you identified any areas where action is required to conform more fully with the requirements of Principle 2?

☐ Yes ☒ No

**Action Plan**

## 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?

Complaints would be handled in accordance with Warrington Borough Council's complaints procedure, details of which can be found on the Council website. Available via https://www.warrington.gov.uk/complaints

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 code of practice and operation manual are in place. Any images or information collected are stored in accordance to this for a specified purpose and kept for no longer than is necessary. Access to CCTV images and recordings is restricted to trained operators and the system is password protected and auditable. A SRO and SPOC have been appointed.

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

All queries relating to CCTV are directed to the SPOC, the IG team signpost any queries, there are dedidicated CCTV pages for all staff to access on the Council's intranet

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?

A CCTV code of practice and a CCTV operators manual are in place which the operators fully adhere to. There is a regular reporting process and any issues that arise are raised at one to one meetings. The CCTV department can be subject to an Audit process at intervals to monitor compliance.

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**

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| Warrington Borough Council currently internally direct all CCTV queries to the SPOC. In the future we will aim to publicise this role further. |

## 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?

Warrington Borough Council have an operators manual and a CCTV code of practice in place which the control room staff operate in accordance with and have received as part of their intitial training. Operators also receive full training on any updates to equipment or systems. Regular team meetings are held to update on any changes to policies or procedures. Any new areas of development are reviewed and privacy zones are installed where required.

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?

All staff are Warrington Borough council employees and have completed CCTV operator courses or have been trained internally. All staff have recently completed training by BT Surveillance due to an upgrade to the CCTV control room cameras and equipment.

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?

N/A

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 NOT USED

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?

Images are stored on the hard drive for 30 days. The CCTV team keep master copies of DVD evidence requested by police for a period of three years before destruction. We consider this to be a proportionate time period to allow evidence to be used in court.

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

CCTV hard drives automatically delete footage after a period of 30 days.
DVD master copies are shredded after the retention period has expired and a certificate of destruction is issued.

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?

Access to data is restricted to trained CCTV operators only who are fully compliant with the CCTV code of practice.

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?

The main CCTV operating system is not connected to the internet so is free from any cyber security risks. If remote access was necessary, connection would be through the secure Warrington Borough Council network which uses a fully encrypted end to end VPN. No information is ever passed to a third party via the internet.

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

The identification of the person making the request is verified and a SAR form is completed.The CCTV team leader will assess as to whether the request is proportionate, and would not prejudice any ongoing criminal proceedings. Privacy masking will be required in the event of a third party being identifiable.

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?

Police - A log of requested footage is taken including times, dates, reason for request, cameras viewed and then cameras and times downloaded. All footage is signed out to police on the collection of any discs.
SAR- SAR forms completed and footage privacy masked if required.

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?

All equipment has been installed to the relevant British standards by contractors who are fully SSAIB registered and audited to adhere to the standards recommended for the CCTV industry.

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

There is a maintenance contract in place to ensure standards are met and maintained regularly. Any faults are reported and actioned within the agreed timescales. Regular meetings are held with our current installer and maintenance provider.

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?

All images and information are stored for the specified purpose within the set timescales. Access is restricted to the CCTV staff only with key fob entry. The building is secure with no access to the public and all visitors are signed in. The main CCTV operating system is not connected to the internet so is free from any cyber security risks (see principle 7, Q38). The CCTV recordings are password protected and can provide a full audit trail of system users.

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?

See Principle 7 Q38.

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

CCTV code of practice document outlines all procedures/guidelines for the use and access of the CCTV equipment/storage..

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?

N/A

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?

N/A

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**

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## 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?

A privacy impact assesment has been completed and is regularly reviewed to ensure the information contained is up to date. Privacy zones on the CCTV cameras are regularly reviewed and installed on any new residential areas.

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

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

The service from our current maintenance provider includes a 24 hour helpdesk for reporting faults, a 24 hour callout response to faults and two preventitive maintenance visits per year. We have regular meetings with the service maintenance providers to ensure this remains effective.

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?

The installation contractor was required as part of the Tender agreement to install a system that would produce evidential quality which complies with the BS 8495:2007 code of practice for digital CCTV recording systemjs for the purpose of image export to be used in evidence.

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?

No facial recognition or ANPR software is used.

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**