

# 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](mailto: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	WEST SUFFOLK COUNCIL
Scope of surveillance camera system	Bury St Edmunds Haverhill Newmarket Mildenhall Brandon
Senior Responsible Officer	LUKE PORTER
Position within organisation	ASSITANT CCTV MANAGER
Signature	
Date of sign off	1/1/20

**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?

Objectives have been set by West Suffolk Council to outline clearly the purpose and legitimate aim of the surveillance system. These aims and objectives can be found published on the CCTV webpage and in our camera code of practice/operational procedure manual.

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

CCTV images are monitored and recorded for the prevention and detection of crime and for public safety

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

To assist in the prevention and detection of crime

To assist in the promotion of community safety and to reduce anti-social behavior.

To assist the client (system owner) in providing any of its prosecuting or contracted services.

To assist in the management of the town center, this includes monitoring safety or operationally critical activities on a particular site

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

Yes

No

Currently the system is NOT being used for any other purposes than those specified above.

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

**Action Plan**

None at present

## 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?

Impact assessments are kept and maintained for our entire surveillance system. If a DPIA is not required we would document with supporting rationale but at present we conduct a DPIA for our whole system.

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

### Action Plan

None at present

### 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?

Contact details are displayed on signage in the surrounding area where CCTV is present. Additionally contact details are also displayed on our webpage for anyone who wishes to make a complaint about the system.

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

#### Action Plan

None at present

## 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?

The governance of our system lies with the CCTV manager but on a wider scale it lies with the DPO.

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>

The overall governance of our system lies with the DPO. This is outlined and publicised throughout the West Suffolk Council website

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?

Team Leaders ensure that the lines of responsibility are always followed by auditing operators work on a daily basis.  
Operators additionally attend/receive training from Team leaders and they are also required to complete e-learning courses

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

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

Yes

No

**Action Plan**

None at present



## 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?

All operators are SIA licenced and additionally undergo continous training in regards to all aspects of the surveillance system and their duties as a CCTV operator.

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?

None as yet

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 system users require an SIA licence

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?

West Suffolk Council has recently deployed the use of 13 body cameras. A code of practice has been published online which outlines policies and procedures.

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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

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29. Have you identified any areas where action is required to conform more fully with the requirements of Principle 5?  Yes  No

**Action Plan**

None at present

## 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?

Our system only retains images for a maximum of 31 days. If footage is not requested within this time frame then footage will automatically delete. This is a substantial time for third parties or police to request data for an investigation.

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

Our system automatically overwrites every 31 days through the programming of our servers.

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

None at present

## 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?

Only SIA licenced CCTV operators have access to images/information retained by our surveillance system.  
Images may be released to police for law enforcement purposes or third parties under DSAR.

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?

Information in regards to footage are not sent via internet to avoid information being lost or stolen.  
Other information can be sent via secure email and is firewall protected.

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

Subject Access Requests are processed by our DPO. The DSAR forms can be found on our webpage along with the procedures and guidelines.

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?

All decisions on the release of information to third parties are made by our DPO and are consequently documented. The policies and procedure published on our webpage are followed and a decision is made based on whether there is a lawful basis to release said information.

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

Yes

No

**Action Plan**

None at present

## 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 Surveillance Camera Commissioner – Surveillance Camera Code of Practice 2013;  
The Home Office – CCTV Operational Requirements Manual 2009;  
The BSIA Form No. 109 – CCTV Surveillance System Code of Practice and Associated Guidelines Issue 4 (July 2014);  
The BSIA Form No. 120 – Maintenance of CCTV Surveillance Systems Code of Practice Issue 3 (Jan 2015);  
BS EN 62676-4: 2015 – Video Surveillance Systems for use in security applications.  
Application guidelines (previously BS EN 50132-7: 2012 – Alarm systems. CCTV surveillance systems for use in security applications. Application guidelines);  
BS EN 62676-1-1: 2014 – Video Surveillance Systems for use in security applications. System requirements – General;  
The latest version of the 17th Edition IEE Wiring Regulations, BS7671: 2008+A3: 2015

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

We ensure that relevant standards are met from commissioning and is maintained appropriately by having this as a contractual requirement with our ongoing maintenance provider.

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

Yes

No

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

Yes

No

**Action Plan**

We will research into getting third-party certification against approved standards

## 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?

Only SIA licence CCTV operators have access to images and information.  
Images are downloaded with hard encoded date and time stamp  
Discs are signed by the operator who has downloaded it and there is an audit trail for all information that leaves the control room

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?

Internal and external firewalls  
Monthly patches and windows updates  
Firmware updates  
Monthly vulnerability scans

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

All procedures/guidelines on our entire system are outlined in the operational procedure manual which is updated everytime there is a change.

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?

Currently West Suffolk Council does not use drone mounted cameras

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?

The use of BWV is currently not used by West Suffolk Council



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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**

None at present

## 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 review is conducted annually to ensure that the surveillance system remains proportionate and is being used and maintained for its stated purpose. Any equipment or cameras that are no longer meeting this purpose are removed.

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

Before the installation of any CCTV, other methods and interventions are always taken into consideration.  
For example, extra lighting or placing security guards on site

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

Our system is maintained on a weekly basis to ensure the system remains effective and secure at all times.

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

Yes

No

### Action Plan

None at presents

## 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?

West Suffolk Council is committed to ensuring that all exported data is of high quality in order to assist police in their criminal investigations.

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

None at present

## 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?

Currently West Suffolk Council only have ANPR cameras on the new WSOH site which monitors security for the site.

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

ANPR registrations are kept on a database for staff only. These are only accessed to add a new member of staff or to delete an ex-employee for security purposes. Only SIA licenced and police vetted operators have access to this system.

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?

Information is only kept if it still has a purpose, for example if it assists police in an ongoing criminal investigation.

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

None at present