

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?

The objectives of the CCTV system, as determined by Stockport Metropolitan Borough Council and its partners, which form the lawful basis for the processing of data are:
ÄTo help reduce the fear of crime, disorder and anti- social behaviour.
ÄThe help deter crime.
ÄTo help detect crime and provide evidential material for court proceedings.
ÄTo assist in the overall management of the Town Centre and public areas within the borough.

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

No

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

Action point - recently we have introduced a PIA process and any proposed new systems will have this assessment applied to them as part of the decision making process.

Action point - during the next 12 months we aim to retrospectively apply the PIA to existing systems to assess if their existence remains justified.

Action point - we need to arrange for the publication of the PIA's - please see Principle 3 for further information on documents to be published.

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

Action point - to put in place an annual review of all signage to ensure it is appropriate.

Action point - to carry out a public consultation during 2016 to ensure Stockport Council's CCTV system is proportionate and effective.

Action point - to ensure that all relevant information is published

- Surveillance Camera Commissioner Self Assessment Tool
- Stockport Council CCTV Code of Practice
- Privacy Impact Assessments
- Service Standards
- Number and Nature of complaints
- Public Consultation (when complete)

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?

Details are contained within the Council's Public Space CCTV Operational Code of Practice, which will be made available on the Council website.

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

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

All staff are conversant with the Code of Practice, and Procedurals manual. Regular visits are conducted by the respective managers and lines of responsibility are discussed in supervision appraisals. All CCTV operators must hold a licence in CCTV as set out by the Security Industry Authority In order to obtain a licence all operators need to pass a BTEC level 4 or equivalent in CCTV monitoring which is accredited by a national body and also undertake a DBS check.

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

No

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.

Details are contained within the Council's Public Space CCTV Operational Code of Practice and the Procedures Manual

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2. Do you follow a quality management system? Yes No

If so please specify.

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

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

All staff are conversant with the Code of Practice, and Procedurals manual. All CCTV operators hold a licence in CCTV as set out by the Security Industry Authority. In order to obtain a licence all operators need to pass a BTEC level 4 or equivalent in CCTV monitoring which is accredited by a national body and also undertake a DBS check.

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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

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

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

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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?

N/A

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

Action plan

No

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?

All footage is automatically saved for 31 days then over written.
All cameras record in time lapse mode unless being viewed by an operator in which case recording is in real time.

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

No

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 release and disclosure of information to Greater Manchester Police, third parties and to individuals in response to a Subject Access Request is detailed in the Council's Public Space CCTV Operational Code of Practice and Procedures Manual. Third party and subject access requests are checked by Council Managers before processing and the protocol agreements between the Council and Greater Manchester Police provides details with regards to the release of information and images to the Police.

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

Action plan

No

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?

The Control Room aims to comply with BS7958 - all parts of the shell of the Control Room are soundly constructed to ensure a reasonable degree of physical security, safety & integrity, for the protection of employees and for the safeguarding of records and property. However, this has not been verified independently.

CCTV Operators and Manager have undertaken an accredited CCTV course and have the

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

Training records are reviewed regularly and expiry dates monitored for licences ensuring that these are renewed in good time.

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

The service would look to implement any standards as required if there were any future changes either in legislation or redevelopment of the Control Room. We also intend to gain accreditation to either the SSAIB or other industry/legal standards.

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

Action plan

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?

Only authorised personnel have access to the equipment within the CCTV Control Room. Greater Manchester Police and the Council work to a partnership protocol to ensure safe and compliant use of the system when the Police request access. Secure room with controlled access. Only authorised personnel have access and operate the equipment located in the CCTV Control Room or other equipment associated with the system. All visitors, regardless of status or purpose, including Auditors, Inspectors and Maintenance

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?

Prevention and detection of crime

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

No

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.

NB: there is to be a full review of all Public Space CCTV during 2016

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

to be revisited after the full review of all Public Space CCTV

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?

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

No

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.

N/A

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 service complies with the Data Protection principles in relation to data retention in that information is stored for as long as is reasonable. Our system is overwritten after 31 days to prevent retaining information.

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

No

Additional Information

Principle 1:

Question 1 continued.....

- To assist in the overall management of the Town Centre and public areas within the borough.
- To enhance community safety, assist in developing the economic wellbeing of the area and encourage greater use of the Town Centre, District Centres, car parks and other public areas where CCTV is deployed.
- To assist the Local Authority in its enforcement and regulatory functions within these areas.
- To assist in Traffic Management.

Principle 5:

Question 4 continued.....

We also pass on any relevant updates in legislation to staff as part of ongoing training.

Principle 8:

Question 1 continued....

CCTV Operators and Manager have undertaken an accredited CCTV course and have the necessary Front Line SIA license.

Any upgrades to equipment recognise service standards and form part of any tendering specification.

Principle 9:

Question 1 continued

personnel, are required to sign the visitors register prior to entering the CCTV suite, stating the time, date, identity of the visitor and reason for the visit.

Additional Information

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