

# 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](mailto: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.

|                                     |                                                                                                                                                                                                                                                 |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of organisation                | Kent Police                                                                                                                                                                                                                                     |
| Scope of surveillance camera system | Kent Police operates a CCTV system inside its 6 designated custody suites.<br><br>The purpose of this self-assessment is to ensure when operating the custody CCTV system, it used in compliance with the Surveillance Camera Code of Practice. |
| Senior Responsible Officer          | Chief Inspector 12548 Glenn Fisher                                                                                                                                                                                                              |
| Position within organisation        | Head of custody                                                                                                                                                                                                                                 |
| Signature                           |                                                                                                                                                                                                                                                 |
| Date of sign off                    | 15/07/2026                                                                                                                                                                                                                                      |

## 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?

CCTV is operated by Kent Police inside its 6 designated custody suites and is used to assist in the management of detained persons who are held in custody and to provide a safe working environment for detainees, staff and visitors. Police Custody is the place where members of the public are taken without their consent when Police Officers and other authorised personnel (e.g. custody officials) have arrested them in line with section 24 of the Police and Criminal Evidence Act 1984 and Code G of that Act. Police Custody is one of the most legislated areas in Policing as a result of these factors, resulting in the need to be able to monitor and evaluate the actions of all persons present.

Within each of the 6 custody suites there are a number of fixed position cameras that have the ability to capture both sound and visual recordings in high definition. The CCTV cameras are located throughout each custody suite including the van dock and entrance areas, some offices, holding areas, charge desk, corridors, cells and some consultation rooms.

The use of the custody CCTV system shall be for the purpose of:

- a. Improving the safety and security of detainees, staff and visitors to custody,
- b. Monitoring the welfare of all detainees held in custody,
- c. Reduce the incidents of self-harm particularly from detainees who have been assessed as high risk,
- d. Act as a deterrent against spontaneous outbreaks of violence and disorder,
- e. Used to support complaints made against police or a post incident investigation undertaken by the Independent Office for Police Conduct (IOPC) or our own internal Professional Standards Department and generally monitor staff performance. Use for staff performance monitoring is not routine and is limited to circumstances such as complaints, investigations or identified learning needs.

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

The use of custody CCTV footage (including audio recording) is undertaken for law enforcement purposes and is processed in accordance with Part 3 of the Data Protection Act 2018.

The processing is necessary for the performance of a task carried out by a competent authority for law enforcement purposes, namely the prevention and detection of crime, the

apprehension and prosecution of offenders, and the safeguarding of individuals within police custody.

The processing involves sensitive processing and is supported by the following conditions under Schedule 8 of the Data Protection Act 2018:

- Paragraph 1 – Statutory purposes
- Paragraph 2 – Administration of justice
- Paragraph 4 – Safeguarding of children and individuals at risk

The use of CCTV, including audio recording, is necessary and proportionate to achieve these purposes, particularly in the custody environment where individuals may be vulnerable and where accurate, objective records of interactions are required for safeguarding, evidential and accountability purposes.

This processing is carried out strictly within the scope of law enforcement activity. UK GDPR lawful bases are not relied upon for the primary processing described.

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

The prevention, detection and investigation of crime and complaints and internal conduct matters. CCTV is constantly recorded and not selectively operated to record any specific individual, group or time.

The custody CCTV installed within Kent Police custody suites is necessary and proportionate, as it is an essential tool used by police to support the legitimate aim of maintaining the welfare and security of people who are detained, work or visit one of Kent's custody suites.

The use of custody CCTV is supported by the Independent Office for Police Conduct (IOPC) report, which examined deaths in police custody and made a series of recommendations, in order to reduce deaths or serious incidents which is referenced in recommendation 7:

“Police forces should ensure that CCTV is available in at least one cell in the custody suite, to be used when a detainee is identified as being at risk, and, where available, that it is fully operational. Independent custody visitors should check that CCTV is operational when carrying out their custody visits.”

Audio recording is necessary to verify statements, complaints and interactions, and to safeguard detainees, officers and staff by ensuring an accurate evidential record.

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

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Yes

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No

N/A

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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**

N/A

## 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

N/A

### 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?

Any concerns or complaints about the use of CCTV within custody, will be directed in the first instance to the custody sergeant, on duty at the relevant custody suite. If necessary the matter will be escalated to Kent Police Professional Standards department. Custody recording is guided by the APP, and is improvement informed by inspection regimes/custody visitors, IOPC Recommendations, and thematic learning from conudtc/complaints outcomes.

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

#### Action Plan

N/A

## 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 use of custody CCTV is overseen by Kent Custody department and used in accordance with Kent Police force policy Q01e, which details the use of the CCTV.

It is also supported by force policy W1000 and associated policies that provides guidance on information management, which underpins Kent Police legal, and national guidance and standards relating to information management.

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

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Yes

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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?

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Yes

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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>

Head of Criminal Justice and Custody Command - Detective Chief Superintendent 9668 Lopa McDermott

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

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Yes

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No

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

Kent Custody department are responsible for overseeing the use of custody CCTV, conduct regular custody suite inspections and provide regular feedback to custody staff.

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?

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Yes

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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?

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Yes

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No

**Action Plan**

N/A

## 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?

- a. Kent Police staff have been trained in the correct use of the custody CCTV system and that it is always to be used in compliance with Kent Police Policy Q01e.
- b. Access to the system is password protected, and the access or use of the custody CCTV system can be monitored via a CCTV management software program.
- c. Use of the system is restricted to authorised Kent Police staff only.
- d. There is operator guidance published within the internal InSite page.
- e. PFI custody suites are operated by the contractor. Medway is Vinci and North Kent is via PFI Site Manager (Wendy Malcolm).

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?

N/A

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 users are trained in the use of the system and the system is used in accordance with force policy Q01e.

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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?

The use of body worn video is detailed on a separate privacy impact assessment.

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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?

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Yes

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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?

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Yes

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No

**Action Plan**

N/A

## 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?

The custody CCTV system can hold 60 days of 'live feed' in non-PFI suites and 80 days at Medway custody, which is stored on a local drive. After these times, unless the stored CCTV has been saved as evidence, the previously recorded CCTV will be overwritten.

This timeframe is proportionate as 60 days is the minimum amount of time in which to process a request for evidential CCTV to be retrieved and often CCTV is lost before we are able to review or save it.

Any CCTV footage required as evidence will be downloaded and saved in accordance with policy Q01e, which is supported by force policy W1000 and associated policies and provides guidance on information management which underpins Kent Police legal, and national guidance and standards relating to information management.

People whose images are recorded on Kent custody CCTV system can request access to the relevant custody CCTV recording via a subject access request.

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

The custody CCTV can be used as evidence for police investigations or complaints. The automatic deletion of the images is carried out in accordance with Management of Police Information Guidelines (MoPI) therefore, depending on the nature of the offence the CCTV is been requested for, under MoPI guidelines, the downloaded CCTV will be stored for 2, 6, 10 or 100 years.

However, automated deletion on non-evidential images takes place after 60 days.

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

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Yes

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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?

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Yes

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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?

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Yes

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No

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

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Yes

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No

**Action Plan**

N/A

## 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 custody CCTV is clearly defined by role and department and is documented within policy Q01e and there are four levels of access:

Level 1. Custody Sergeants and Detention Officers,

Level 2. Police Inspectors,

Level 3. Professional Standards and some specialist departments,

Level 4. ITD administrator.

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

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Yes

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No

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

Downloaded custody CCTV footage is kept on a secure police IT network for which the access is password protected.

Any disclosure of the downloaded custody CCTV i.e. evidence to be sent to the Crown Prosecution Service will be disclosed via secure means, to safeguard against cyber, data or information security risks.

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

All requests are processed by the Public Disclosure Team (PDT) in accordance with the legislation. Requests for material relating to Subject access requests are authorised by Kent Custody department, and access to the system is provided by Kent Police IT department in accordance with force policy Q01e.

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?

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Yes

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No

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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?

The custody CCTV is only accessible via a secure Kent Police IT network, and will be accessed only by authorised internal Kent Police users. Sharing of information is done via Digital Asset Management System (DAMS), and this sharing is recorded within the system.

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

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Yes

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No

**Action Plan**

N/A

## 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 has not been formally certified against British Standards; however, it operates in line with recognised operational and security requirements and is subject to ongoing review and maintenance.

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

The use of CCTV within Kent's 6 custody suites is governed by strict policy, which is reviewed every 2 years.

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

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Yes

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No

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

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Yes

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No

### Action Plan

N/A

## 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?

The following safeguards are in place to support the operation of the custody CCTV;

- a. The system operates on a secure Kent Police IT network, which is protected against cyber security risks.
- b. Access to the CCTV system is limited to authorised personnel and is password protected to guard against unauthorised use.
- c. Images or CCTV footage that has been downloaded as evidence is kept securely in accordance with MoPI guidelines.
- d. The use of the custody CCTV system is also supported by force policy W1000 and associated policies that provides guidance on information management which underpins Kent Police legal, and national guidance and standards relating to information management.

Access to CCTV footage is subject to audit logging, periodic review of access rights, and monitoring to detect inappropriate access.

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

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Yes

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No

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

The custody CCTV system operates on a secure Kent Police IT network that has enhanced security through appropriate levels of security protection..

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

The use of the custody CCTV system is used in accordance with policy Q01e. It is also supported by force policy W1000 and associated policies that provides guidance on information management which underpins Kent Police legal, and national guidance and standards relating to information management.

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

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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

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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.

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Yes

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No

**Action Plan**

N/A

## 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?

All Kent custody suites are maintained routinely, which includes the maintenance and testing of the custody CCTV system.

Kent custody suites are subject to regular external scrutiny and inspection by independent custody visitors following their visit they provide feedback about issues they have identified from their visit.

Any issues associated with the operation and use of the custody CCTV system will be raised with Kent Custody department.

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

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Yes

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No

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

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Yes

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No

N/A

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

Kent custody CCTV system is supported by a maintenance contract, which includes a fault reporting process where reported faults are repaired as soon as possible to ensure the custody CCTV operates as effectively as possible.

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

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Yes

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No

**Action Plan**

During the annual custody closures, a site survey will need to be carried out to ensure the custody CCTV cameras are sited in the correct locations, and there remains a legitimate reason for the CCTV system to remain in place.

## 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
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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 custody CCTV is installed within a police setting and the use of the system requires the capability to be able to download images of evidential quality.

The technical and operational requirement for the system was set by Kent Police prior to installation in order meet the appropriate user requirements.
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61. Do you have safeguards in place to ensure the forensic integrity of the images and information, including a complete audit trail? ☒ Yes ☐ No
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62. Is the information in a format that is easily exportable? ☒ Yes ☐ No
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63. Does the storage ensure the integrity and quality of the original recording and of the meta-data? ☒ Yes ☐ No
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64. Have you identified any areas where action is required to conform more fully with the requirements of Principle 11? ☐ Yes ☒ No

### Action Plan

N/A

## 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?

N/A

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?

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Yes

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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?

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Yes

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No

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

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Yes

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No

### Action Plan

N/A