

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.

Name of organisation	Kent Police
Scope of surveillance camera system	Automatic Number Plate Recognition
Senior Responsible Officer	Ch Supt Robert Fordham
Position within organisation	Deputy Head of Serious Crime Directorate
Signature	
Date of sign off	1st July 2019

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?

Automatic Number Plate Recognition (ANPR) technology is used within Kent to help detect, deter and disrupt criminality at a local, force, regional and national level, including tackling travelling criminals, organised crime groups and terrorists

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

ANPR operates under a complex framework of legislation of general application, including the General Data Protection Regulations (GDPR), the DPA, the Surveillance Camera Code and Common Law. ANPR data from police forces is police information within the meaning of The Code of Practice on the Management of Police Information 2005 (MoPI) made under the Police Act 1996 and Police Act 1997.

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

ANPR infrastructure is only be deployed law enforcement purposes defined by the DPA as “the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security”

4. Is the system being used for any other purpose other than those specified? If so please explain. Yes No

The Kent ANPR system provides encrypted and non-personal data to Kent county council for a limited time frame of 20 mins to allow for journey time analysis to be made.

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

Action Plan

None identified at this time

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?

We believe that a data protection impact assessment is required and an overarching one is being prepared by the head of information management. Draft date for completion 11th July 2019

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

Action Plan

We need to ensure that in future the DPIA is reviewed yearly and on time.

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?

Our public facing website has an ANPR section detailing how to make a complaint.
<https://www.kent.police.uk/about-us/anpr-en>

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

Action Plan

Data protection officer to review privacy notice on the Kent Police website to ensure compatibility with changes to retention periods of data

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?

ANPR Strategy board meeting 6 times a year chaired by SRO Ch Supt Fordham.

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>

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?

Regular audit of user accounts to ensure compliance. Adherence to the National ANPR standards for Law Enforcement (NASPLE)

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

Yes

No

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

Yes

No

Action Plan

Principle 5

Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.

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

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

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

Regular briefings and news updates at the front end of the product that users will see when logging onto the system. Force wide email communications to users. New NCALT training package to be delivered from September 2019.

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?

There are currently no occupational standards that relate specifically to the use of ANPR.

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 view a presentation prior to being given access to the system. Training days and ANPR workshops are held where possible.

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

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?

NPCC guidance is followed with the retention period for data being 12 months. All data is auto deleted after this point. Hot lists are reviewed daily and subject of weeding weekly.

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

Auto delete is in place when images reach 12 months

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

Yes . point 32 – a review is under way of preserved data under MOPI to ascertain the continued justification for retention.

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 the system is role based and on a necessity basis only.
One dedicated single point of contact administrates all user accounts and access.
System administrators are appointed, Regular dip checks of usage are conducted.

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?

All documents are shared on a secure .gov network which is home office approved.
Any disclosures by mail are sent signed for and recorded delivery.

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

A specific department deal with all requests for disclosure and the ANPR data officer liaises closely with that team in respect of FOI and disclosures.

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?

Information sharing agreements are in place with any third parties.
We do not share information outside of the Law enforcement community as defined within the NAPLE Jan 2019

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

Yes

No

Action Plan

Principle 8

Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.

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

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

The National ANPR Standards for Police and Law Enforcement 2019.

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

Regular reviews of systems to ensure compliance – appropriate staff in place

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

Additional staff / resources are required to complete and fully comply with the NASPLE testing of camera performance on a yearly basis.
45. We are looking to try to achieve SCC certification of our systems by September 2019.
The NAS Audit requirements will result in the need to employ additional staff solely in an audit role

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?

Unique password protection of user accounts. Auto suspension of accounts with inactivity. Single point of contact for administration of users based on role.

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?

Kent IT directorate take full responsibility for guarding against security and cyber threats. Specific software and details of all firewalls etc will not be released.

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

Policy S0101 and S100 related to handling of images and management of information

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

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?

Annual camera reviews are carried out (although due to resourcing these are currently behind schedule) they are designed to ascertain the performance of a camera against the reason it was installed. Yearly strategic assessments conducted.

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?

We have a dedicated systems manager and shared ANPR engineer. We also have 24/7 – 365 cover with a 6 hour SLA for maintenance at our most critical sites integral for the protection of critical national infrastructure and CT related matters.

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 this time

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 National ANPR strategy group work closely with CPS around evidential production and compliance

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

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?

We make excellent use of ANPR for the prevention and detection of crime and prosecution of offenders.

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

Policy S0101 and SOP's – threshold test of what action should be taken if the vehicle is stopped.

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?

NPCC Guidance on retention of ANPR data

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