

## 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 surveil 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](mailto: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.

Yes     No

1. Have you translated principle 1 into clear objectives?

If so what are they?

The South Gloucestershire Council CCTV Code of Practice sets out how the Council and its partners ensure that the CCTV systems installed; and operated in conjunction with our partners, complies with the law. Signatories to this protocol include the Council, Avon and Somerset Police and Bristol City Council. In addition to this, we have a separate contract with Bristol City Council for the monitoring of our community safety cameras.

Community Safety CCTV cameras are installed in our town centres and along our Metrobus routes where intelligence shows levels of anti-social and criminal behaviour and for the purpose of preventing and detection of crime. A review of all our CCTV cameras is conducted annually at the end of each financial year, by the Councils CCTV Officer. This is to assess proportionality and justification for the deployment of all cameras in a locality. Findings of this review are recorded.

Rapid Deployable Cameras: are only deployed in ASB hotspot locations where it is necessary and proportionate to do so, based on available evidence at that time. Cameras are deployed for a maximum of 3 months and reviewed regularly throughout that period.

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

The Community Safety CCTV systems are primarily used for the purpose of the prevention and detection of crime, which includes the use of rapidly deployable and body worn cameras used by Parking Services, Libraries, and taxi/street marshals. Law enforcement agencies may also request the usage of the Community Safety CCTV system for covert surveillance once RIPA authorisation has been granted.

The South Gloucestershire Council Code of Practice clearly outlines circumstances where the CCTV system may not be used.

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

### Action plan

Not applicable.

## 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?   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2. Have you conducted a privacy impact assessment?<br>(The ICO has produced a PIA code of practice and the SCC has a template you can use if required) | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 3. Do you publish your privacy impact assessment and annual review?  | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 2?                          |   |  |

No further actions identified.

## 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?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Does the signage highlight the point of contact?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Is the surveillance system a proportionate response?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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?     | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Do you have a complaints procedure in place?  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Do you make the public aware of how to escalate complaints?   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> 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

The South Gloucestershire Council Code of Practice for CCTV is currently being updated and will be published on the Councils website.

The Council has a dedicated CCTV Officer who has responsibility for ensuring appropriate access to information; and deals with requests for service and complaints in relation to the community safety CCTV System.

A private consultant was appointed to ensure the appropriate consultation was carried out at the design and implementation stage of the community safety CCTV network. An appropriate consultation framework will be established as and when any expansion work is required.

With regards to deployable CCTV cameras, our procedures require that consultation is held with communities by way of door to door visits and letter in advance of deploying cameras in ASB hotspot localities and when they are removed.

Currently performance statistics are not published. Consider will be given to indicators used by other bodies and included in our annual service plan

Actions:

1. Establish appropriate consultation framework ensuring appropriate consultation is undertaken for any expansion to the Councils community safety CCTV Network.
2. Paragraph to be added to website explaining the ongoing upgrade from analog to IP within SGC by Summer 2018.

### 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?

Strong Safer Communities are responsible for all community safety cameras.

The SGC Code of Practice clearly identifies the responsible Officer(s) within each organisation, including the Council, Police and Bristol City Council; and their responsibilities. This includes the operation of control rooms and their staff, management of information and the storage and retention of images.

---

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

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

1. Management structure including regular one to ones, annual reviews and an annual report to the community safety partnership.
2. Quarterly review meetings with providers.
3. Meetings with Partner agencies such as the Police and Trading Standards and Licensing to address issues and concerns as they arise.

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 further actions identified.

### 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.

The CCTV Code of practice is currently being updated and will be displayed on our website on completion. Procedure guides are in place as published on our website.

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

If so please specify.

Not applicable.

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

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

CCTV Lead and line manager attend CPD and regularly review compliance. CCTV Officer is SIA Qualified Bi-annual RIPA training is a requirement for all Officers involved in the use or deployment of CCTV. Training for all Officers with access to the local Review Suite is mandatory, with an emphasis on data protection and the law. Refresher training is provided by the Councils CCTV Officer as and when required.

The Council requires all its staff to complete compulsory corporate e-learning in ICT Security, Data Protection and FOI. SAR/customer data protection rights training is also provided to staff who directly deal with such requests.

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

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

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

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?

The Councils CCTV Officer is SIA Qualified and receives TAVCOM training to support the involvement in the operation and deployment of community safety CCTV. As best practice, all SGC personnel who have access to the CCTV Review Suite are SIA Licensed.

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

No further actions identified.

## 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?

The council's policy is that all CCTV footage is kept for a maximum of 30 days.

The retention period is informed by the purpose for which the information has been collated and occasion footage may be kept for longer to achieve this purpose.

- |   |       |    |
|---|-------|----|
| 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 further actions identified.

## 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? |       |    |

Images retained by our provider, Bristol City Council, are reviewed regularly by the Councils CCTV Officer. Where Police Officers fail to collect discs for evidential purposes, a report is submitted to the Superintendent. Personal Data Request Forms are submitted to Bristol Operations Centre prior to any CCTV footage being handed to the Police.

The Councils policies and procedures for all its community safety CCTV clearly outline the management of information, which includes how images are stored, retained and reviewed.

Separately, the Data Sharing Agreement between the Council and Police for the local review suite sets out clear procedures for access to and viewing of live images, data storage and retention. Access is restricted to authorised Officers only who are required to sign in and out.

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

### Action plan

No further actions identified.



## 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 systems are installed to the appropriate standards BSEN S0132-7

For further information;

<http://www.bsia.co.uk/portals/4/publications/109-installation-cctv-system.pdf>

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

Providers of our Repairs and Maintenance contract are approved by the National Security Inspectorate (NSI) and are audited quarterly by NSI.

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

Contractual requirements ensure our Providers are required under the terms of their contractual arrangements to comply with the most recent CCTV guidelines as issued by the ICO 2015. This has to be evidenced to achieve the NSI accreditation and certification.

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

### Action plan

1. To implement any new requirements as and when new legislation or guidelines are issued.

## 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?

All procedures cover security of data  
Controlled access to Review Suite  
Audit log of downloads  
Restricted access  
Appropriate training  
Images stored on encrypted laptops  
Individual password entry onto the system for user

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?

All of the Councils community safety CCTV is registered with the Data Commissioner. Community Safety CCTV cameras are installed in our town centres and along our Metrobus routes where intelligence shows levels of anti-social behaviour and criminal behaviour, for the purpose of preventing and detection crime. A review of all our CCTV cameras is conducted annually by the Councils CCTV Officer to assess proportionality and justification for the deployment of all cameras in a locality. Findings of this review are recorded.

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 further actions identified.

## 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?                 | <input checked="" type="checkbox"/> Yes | No |
| 2. Have you identified any cameras that do not remain justified in meeting the stated purpose(s)?   | <input checked="" type="checkbox"/> Yes | No |
| 3. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras?<br>If so please provide brief details. | <input checked="" type="checkbox"/> Yes | No |

Community Safety CCTV cameras are monitored 24 hours a day, 7 days a week. The alternative to this would be to significantly increase the presence of Police Officers, to patrol those same locations. Resources of this level do not exist and would be costly.

This is considered as part of the formal annual evaluation

An evaluation of ASB hotspot locations is always undertaken, to determine levels of intervention. Deployable CCTV cameras are considered as part of this evaluation and are only deployed where it is necessary and proportionate to do so. Prevention and early intervention methods are always used in the first instance.

- |  |   |    |
|--|---|----|
| 4. Is it cost effective to continue running your surveillance camera system?   | <input checked="" type="checkbox"/> 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

No further actions identified.

## 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? |       |    |
| Private consultant appointed to ensure that exported data would be of sufficient quality to be used for evidence<br><br>Evidence has been tested in Court on a number of occasions and has always proved to be of sufficient quality         |       |    |
| 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 further actions identified.

## 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 (BWV) or remotely operated vehicles (Drones)?  Yes  No

If so, please specify.

Bodyworn CCTV for taxi marshals.  
Deployable CCTV  
Some of our community safety cameras have ANPR capability but are not enabled.

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?

Not applicable.

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 further actions identified.

## Additional Information