

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 mailinglist.

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 Dartford Borough Council's CCTV System, Which from the lawful basis for the processing of data, are:

To Help reduce the Fear of Crime.

To Help deter Crime.

To Help detect crime and provide evidential material for court proceedings.

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

Insurance related claims- at no cost at present.

Monitoring of Traffic Flow - No enforcement action at present.

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

Action plan

No action currently required

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

We will Conduct a privacy impact assessment using the PIA Code of Practice and SCC template when needed annually and have it ready for review when completed.

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 complaints 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

Dartford Borough Council will Consider the publication of certain management information and statistics to improve transparency even further.

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?

The DBC CCTV Management Team have a day to day responsibility for the System as a Whole. We have procedures in place and they are very clear who can access the Control room, Who can review and access the footage and how it is stored and for the length of time. This information can be found in the CCTV Code of Practice. Allstaff working in the Control Room have a clear understanding of the Procedures and these are monitored on a daily basis ensuring

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

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

The Control Room Supervisor Conducts regular checks to ensure the evidential process is followed in accordance with our Code of Practice and Operational Procedure manual. The Supervisor makes sure regular checks are made on the footage produced by all Operators to ensure the camera system is being used appropriately. All staff are BTEC Level 2 trained in CCTV Operations and they are aware of their rolls and responsibilities regarding the operation

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 action currently required.

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.

Clear policies and procedures are set out in both the DBC CCTV Code of Practice and accompanying operational Procedure manual. These Documents include a number of Memorandums of Understanding and working protocols.

2. Do you follow a quality management system? Yes No
If so please specify.

We gather and regularly publish to Council Members a Number of Key Performance Indicators previously identified by The Kent CCTV User Group.

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?

Any additional training or development needs to be identified throughout the year and any relevant training needs are addressed and discussed during the Boroughs Corporate appraisal reviews. Any new policies or procedures are conveyed to all operating staff immediately upon introduction.

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?
(Please see SIA website: www.sia.homeoffice.gov.uk) Yes No

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?

Whilst SIA licenses are not currently required as all staff are employed directly, all CCTV Operators employed by Dartford Borough Council are still required to attend and pass SIA accredited Public Space surveillance (CCTV) training before a permanent position is offered. All existing staff were also required to attend and pass the same course.

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

Action plan

No action currently required.

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 CCTV images are subject to a 31 day retention policy as stipulated within the Boroughs CCTV Code of Practice and Operational manual unless seized and retained by Police or other agencies for the detection or prevention of crime and disorder.

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 action currently required

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 Control Room Supervisor is responsible for ensuring that all retention, access and disclosure procedures and policies are adhered to by all staff with the CCTV Manager taking overall responsibility.

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

Action plan

No action currently required.

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?

Dartford Borough Council's CCTV System currently meets all operational, technical and competency standards relevant to local Authority Public Space Surveillance CCTV Systems.

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

The Control Room Supervisor along with the CCTV Operators carry out daily checks across the systems and report them accordingly.

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

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

Action plan

No action currently required.

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?

Dartford Borough Council CCTV Control Room is at all times secured by a Magnetic Lock Pin System and can only be accessed by Members of the CCTV Department. Authorized personnel will be present at all times when the equipment is in use and control access to recorded images. Only those qualified and trained personnel will be authorized to operate the equipment within the CCTV Control Room. Public access to the CCTV Control Room will be prohibited except for proper and sufficient reasons and with the authority of the System Manager.

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?

The information used and accessed is for Community Safety purposes and Specifically the prevention and detection of crime. This use is consistent with the specified objectives of the system and is documented within the Code of Practice for the Operation of the community Safety CCTV System.

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 action currently required.

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.

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

No action currently required

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?

The Community safety CCTV System was established in the Summer of 1996 and evolved from the formation of a Community Safety Partnership as defined within the Code of Practices for the Operation of the Community Safety CCTV System.

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 action currently required

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.

We will be looking at specialist technology in Body Worn Cameras in the near future and all will comply with our Code of Practice.

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?

N/A

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

Additional Information

Additional Information

Additional Information