Surveillance Camera Code of Practice:
Self-assessment tool

Date of Review:	April 2016
Responsible Officer:	Community Safety CCTV Manager Royal Borough of Greenwich
Contact Details of Responsible Officer:	020 8921 2482 cctv@royalgreenwich.gov.uk
Next Review Due By:	April 2017

This self-assessment tool has been provided by the Surveillance Camera Commissioner to help organisations identify if they are complying with the principles in the code. It should be completed in conjunction with the underlined surveillance camera code of practice. The tool will help organisations show how well they 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.

In the interest of transparency the Surveillance Camera Commissioner is encouraging organisations to publish the self- assessment on their 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.

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	
The objectives of the system are: • To reduce the fear of crime, disorder and anti-social behaviour • To deter crime • To detect crime and provide evidential material for court proceedings • To enhance community safety, assist in developing the economic well-being of the Royal Borough of Greenwich and encourage greater use of the town centres, university, car parks, open spaces and shopping areas etc. • To assist the Local Authority in its enforcement and regulatory functions within the Royal Borough of Greenwich • To assist in Traffic Management • To assist in supporting civil proceedings, which will help detect crime		
2. Do you regularly review the system and assess against the objectives?	Yes	

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3. Have you considered the requirement of the end user?	Yes	
4. Is the system being used for any other purpose other than those specified?		No
Not applicable		
5. Have you identified any areas where further action is required more fully conform with the requirements of Principle 1? None identified *Note*. The aims and objectives of the system are reviewed annually in April.		

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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	
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	
3. Do you publish your privacy impact assessment and annual review?	Yes	
4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 2? The following documents are to be published on the RBG website and updated annually • Community Safety CCTV – Annual Performance Report • Community Safety CCTV Service Standards • Community Safety CCTV System Annual Review • Privacy Impact Assessments • Surveillance Camera Code of Practice: Self-assessment tool Any cameras requiring privacy zones will be recorded on the camera database		

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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	
2. Does the signage highlight the point of contact?	Yes	
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	
4. Is the surveillance system a proportionate response?	Yes	
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	
6. Do you have a complaints procedure in place?	Yes	
7. Do you make the public aware of how to escalate complaints?	Yes	
8. Is there a defined time scale for acknowledging and responding to complaints and is this conveyed to the complainant at the outset?	Yes	
9. Do you publish the number and nature of complains received?	Yes	

10. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 3?

As part of an on-going programme, updated signs are available to replace missing or damaged signs as required.

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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?
- CCTV system entered on Information Commissioners – Data Protection Register
- System ownership and management responsibilities are clearly defined in the Royal Borough of Greenwich Code of Practice for the Operation of the Community safety CCTV System
- Adoption and publication of service standards in delivery/management of the system
- Monthly performance data provided for review by the Departmental Management Team
- Publication of annual performance report and service standards

2. Are all staff aware of their responsibilities?	Yes	

2. Please explain how you ensure the lines of responsibility are adhered to.
- All staff are trained to Level 2 in CCTV Operations (Public Space Surveillance)
- Mangers are trained to Level 4 in Managing CCTV Control Rooms
- Internal/external refresher training is provided as required

4. If jointly owned, is it clear what each partner organisation is responsible for and what the individual obligations are?	N/A	

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

None identified

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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	
- Strategic Framework 2014-2017 - Code of Practice for the Operation of the Community Safety CCTV System - Operational Procedure Manual		
2. Do you follow a quality management system?	Yes	
If so please specify. The Royal Borough of Greenwich operates a Quality Management System which complies with the requirements of ISO 9001:2008 for the provision of CCTV services. This was awarded in march 2016.		
3. Are the rules, policies and procedures part of an induction process for all staff?	Yes	
4. How do you ensure that all system users remain up to date and efficient with relevant operational, technical, privacy considerations, policies and procedures? - External refresher training provided as required to ensure staff remain up to date - Internal on-going training delivered to staff through 1 to 1s and team briefings		
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	
6. If so, have any of your system users undertaken any occupational standards to date?	Yes	
7. Do your system users require SIA licenses?(Please see SIA website: www.sia.homeoffice.gov.uk)		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? - All staff are trained to Level 2 in CCTV Operations (Public Space Surveillance) - Mangers are trained to Level 4 in Managing CCTV Control Rooms - Internal/external refresher training is provided as required		
9. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 5? Surveillance Camera Commissioner Certificate of Compliance awarded in March 2016 and valid until March 2017		

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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? • Recorded images are retained for 31 days unless required for evidential purposes or become part of an unresolved incident. Once resolved the information will then be deleted or overwritten by the system	
2. Do you have an auditable process for reviewing images and managing their retention?	Yes
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
4. Are there any time constraints which might affect external parties from viewing the images?	Yes
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
6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 6? None identified	

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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	
2. Do you have a policy on disclosure of information?	Yes	

3. What checks do you have in place to ensure that the disclosure policy is followed?

- Rules of disclosure are contained within the Code of Practice for the Operation of the Community Safety CCTV System. All non-police disclosure requests are checked and dealt with by the officer responsible for data protection (data guardian) in liaison with the system manager/supervisor

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

Action plan

None identified

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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? • BS7958 Management and Operation of CCTV Systems • Home Office Scientific Development Branch CCTV Operational Requirements
2. How do you ensure that these standards are followed appropriately? • Guidance incorporated within system procedures
3. What steps are in place to secure certification against the approved standards? • Certification against the standard is not required as it provides recommendations only
4. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 8? Action plan None identified

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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?

- The CCTV control room is at all times secured by 'Magnetic-Locks' and can only be accessed by authorised personnel
- Authorised personnel will be present at all times when the equipment is in use and will control access to recorded images
- Only trained or authorised personnel will operate the equipment located within the CCTV control room
- Public access to the control room is prohibited except for proper and sufficient reasons and requires the authority of the system manager

2. If the system is connected across an organizational network or intranet, do sufficient controls and safeguards exist?	N/A	

3. What is the specified purpose for which the information are being used and accessed and is this consistent with the stated purposes?

- 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 as 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	
5. Are your procedures and instructions and/or guidelines regarding the storage, use and access of surveillance system information documented?	Yes	

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

None identified

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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	
2. Have you identified any cameras that do not remain justified in meeting the stated purpose(s)?	Yes	
3. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras?		No
If so please provide brief details.		
4. Is it cost effective to continue running your surveillance camera system?	Yes	
5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 10? None identified		

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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	
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 1997 and evolved from the formation of a Community Safety Partnership as defined within the Code of Practice 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	
4. Do you have a policy on data storage, security and deletion?	Yes	
5. Is the information stored in a format that is easily exportable?	Yes	
6. Does the storage ensure the integrity and quality of original recording and the meta data?	Yes	
7. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 11? None identified		

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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	
If so, please specify. Body Worn Video (BWV) has recently been introduced and is worn by Officers within the Town Warden Service		
2. Do you have a policy in place to ensure that the information contained on your database is accurate and up to date?	N/A	
3. Do you have a procedure for deciding when and whether an individual or vehicle should be included in a reference database?	N/A	
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	
6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle 12? None identified		

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