



## 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	Bedford Borough Council
Scope of surveillance camera system	The scope of the Bedford Borough Council CCTV system is to support the prevention and detection of crime, the reduction of public disorder and provide security for members of the public, law enforcement staff, our own employees, local events and high value locations. The CCTV system also seeks to provide reassurance to the public, reducing the fear of crime where it is proportionate and appropriate to do so.
Senior Responsible Officer	Sue Lyons
Position within organisation	Chief Officer for Legal & Democratic Services
Signature	
Date of sign off	11/11/2021

**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?

Crime and disorder issues evidenced within a strategic assessment document produced by Bedford Borough Council as a statutory requirement of the Crime & Disorder Act 1998 as amended.

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

According to the General Data Protection Regulations (GDPR) Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller, and the Data Protection Act 2018, we must have a reason to collect and use your information. The system was established under Section 115 of the Crime and Disorder Act. It operates within the legislation requirements and is fully accredited by the industry inspectorates to all required standards.

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

The deployment of CCTV is one in a range of crime and disorder reduction measures used by Bedford Borough Council part of the statutory Community Safety Partnership. The deployment of each CCTV deployment is done so after consultation with the Police and other statutory partners to agree that CCTV is the appropriate, necessary and proportionate tactic to deal with specific crime and disorder issues.

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

Yes

No

Additionally CCTV is also used to provide security for a number of high value sites, events and parking areas.

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

**Action Plan**

The Community Safety Partnership(CSP) ISA regarding exchange of information under Section 115 of the Crime & Disorder Act 1988 as amended 2006 is currently being review for compliance with GDPR and more recent Data Protection guidance.

This has been reviewed, and will be a cyclical action due to ongoing changes in legislation and partners within the CSP

## 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?

Not applicable as we do have a DPIA

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

### Action Plan

Not at present and there are no plans to install Facial Recognition as part of the system.

### 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?

Bedford Borough Council has a formal complaint reporting system with published timescale for responses and resolutions.

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

#### Action Plan

Bedford Borough Council CCTV control room do use Body worn cameras or use Facial recognition at this time.

This will be reviewed on an ongoing basis and may change in the future

## 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 Bedford Borough CCTV Code of Practice states the conditions under which the CCTV system must be operated. Compliance by the third party contractor is monitored through regular meetings with the CCTV Control room supervisor and formal meetings between the third party contract manager and the Community Safety & Resilience Manager for Bedford Borough Council, the CCTV Single Point of Contact (SPOC) and client officer. A log is maintained of any CCTV images shared and the lawful grounds for doing so. Any breaches of the Code of Practice or legal opinion required before doing so would be reported to the Senior Responsible Officer (SRO).

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>

The single point of contact has been added to the Bedford Borough Council CCTV web page

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?

No CCTV operator is allowed to release any information or images. That task is carried out only by the CCTV Supervisor under the direction of the SPOC. The SPOC meets with the CCTV System supervisor to discuss technical issues, movement of cameras and the provision of CCTV evidence to the police or other lawful recipient. The issue of CCTV images is logged and recorded with the reasons for doing so. Any breaches would be reported to the SRO.

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**

No Applicable



## 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 meetings take place with the Contract Manager, the CCTV Supervisor and the SPOC to review standards and performance. Individual issues or changes in policy are managed within that meeting. Any issues around compliance with the Code of Practice are discussed in that meeting. All the staff are SIA qualified and trained during a probation period in the use of the CCTV systems. The training and technical skills of the Control staff are reviewed annually by the National Security Inspectorate (NSI), a company recommended by the Surveillance Commissioner for this purpose. The SPOC is interviewed within that inspection process regarding compliance and service delivery of the staff.

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?

None.

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?

Not applicable.

---

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?

A specific policy for the use of BWV has been produced to provide that guidance and is implemented by the services utilising BWV. The CCTV control room do not use Body Worn Cameras.

---

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

We have no drone capability.

---

29. Have you identified any areas where action is required to conform more fully with the requirements of Principle 5?  Yes  No

**Action Plan**

The CCTV Manager who is new in post needs to aquire SIA accreditation as non frontline staff.

The deputy SPOC is already SIA accredited

## 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 data recorded is retained for 30 days before being overwritten on the hard drive. This provides a reasonable period of time for a lawful request to be made for images. The rewriting of the data with new images ensures that data will not be retained beyond that period.

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

As stated above. The images are effectively and automatically deleted and no longer accessible after 30 days.

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

## 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?

The images are burned onto unique sequentially numbered DVDs with time date of issue, contents and grounds for providing the images are issued to recipient under signature in a written log. The log is reviewed by the SPOC. CCTV evidence provided by post follows the same process being sent by recorded delivery to be signed for by the named recipient. There is no entry to the CCTV suite for non-control room staff unless with the express permission of the Control Room supervisor which is again recorded under signature

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?

The system is a closed system not linked to the main network. The system has been reviewed by the Bedfordshire Police Cyber Security consultation which will be repeated annually. There are also plans in place to update the software on the more complex equipment to further enhance security.

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

Subject Access Requests are managed and monitored within the Bedford Borough Council subject access request system.

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?

As stated previously information will only be supplied to third parties by the Control Room supervisor under the direction of the SPOC. Each release with the lawful reasons for doing so is recorded in a log which is regularly reviewed by the SPOC. Any release is done so against signature or recorded delivery after verification of identity.

---

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?

We are working within BS7958 – Closed Circuit Television (CCTV), Management and operation guidelines

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

The system was established over 15 years ago and was compliant with the operating standards of the day. More recently changes in Data Protection legislation, GDPR and the Surveillance Commissioners 12 step code of practice have been built into the operating standards.

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

Review CCTV operation and policies against BS7958.

## 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?

CCTV images and information are only accessed by individuals who have legal authority to do so. Typically that would be the Police, as part of a lawful investigation or prosecution, Insurance companies and solicitors, appropriately authorised. In very limited circumstances members of the public representing themselves in civil cases with proof of the relevant ongoing court case will be provided with CCTV for court purposes. In each instance the purpose for releasing the information is very specific, is unlikely to be shared beyond the agreed lawful purpose and not to be shared beyond the agreed lawful purpose agreed without the expressed permission of Bedford Borough Council. A legal chain of evidence document accompanies each release of information.

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?

The system is a closed system not linked to the main network. The system has been reviewed by the Bedfordshire Police Cyber Security consultation which will be repeated annually. There are also plans in place to update the software on the more complex equipment to further enhance security.

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

As stated previously information will only be supplied to third parties by the Control Room supervisor under the direction of the SPOC. Each release with the lawful reasons for doing so is recorded in a log which is regularly reviewed by the SPOC. Any release is done so against signature or recorded delivery after verification of identity.

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?

Bedford Borough Council do not use drones as part of the CCTV system.

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?

The data on each camera cannot be downloaded, deleted or copied without the secure software, managed by the line supervisors of Council Officers. The CCTV Control Room do not operate Body Worn Cameras

---

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**

No further action planned currently, however issues identified, will be actioned without delay



## 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?

A review of the fixed CCTV cameras is carried out on an annual basis to consider effectiveness, proportionality and reliability in the context of evidential quality. Each mobile camera is subject to an individual scrutiny process reviewing a number of criteria and the duration for which the camera will be deployed that is reviewed monthly at a multi agency partnership meeting. All current CCTV deployments are carried out overtly. If deployed in residential areas each affected residency is informed in writing with contact details of a named individual if residents have concerns

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

Deployment of mobile CCTV cameras is subject to an application process considering available intelligence, the severity of the issue, is CCTV the most appropriate solution and the potential impact upon individual privacy. This is reviewed on a monthly basis at a joint Local Authority & Police Tasking meeting. The applications are stored within the CCTV Control room. The fixed CCTV cameras are given exactly the same consideration and are reviewed on an annual basis if not more frequently in areas subject to higher levels of crime and disorder.

Prior to any camera being deployed alternate enforcement measures and powers are considered and reviewed

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

A review of the CCTV cameras is carried out electronically each week, a faults log compiled and copied into the maintenance company. A fixed weekly maintenance day is established for both CCTV cameras and supporting systems.

---

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

Yes

No

**Action Plan**

The Community Safety Partnership(CSP) ISA regarding exchange of information under Section 115 of the Crime & Disorder Act 1988 as amended 2006 is currently being review for compliance with GDPR and more recent Data Protection guidance.

This has been reviewed and will be a cyclical action due to ongoing changes in legislation and partners within the CSP

## 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?

Liaison with our own legal services and Police to ensure the evidence when produced complies with the rules of evidence.

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

No further actions required at this time.

## 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?

The Local Authority also uses Automatic Number Plate Retrieval CCTV for bus lane, school entrance no parking zones and car park surveillance. At the present time the Local Authority has no plans to make use of Facial Recognition Software.

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

The ANPR reference database is maintained by Bedfordshire Police. The Local Authority do not have the direct access to include additional vehicle numbers.

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?

The relevant data and the subsequent policy sits with Bedfordshire Police as our operators do not have access to the ANPR database.

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

None at present.