

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.

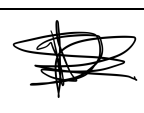
What should I do next?

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	City of Westminster
Scope of surveillance camera system	The enforcement of moving traffic contraventions.
Senior Responsible Officer	David Robson
Position within organisation	Service Readiness Officer
Signature	
Date of sign off	24/07/2019

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?

To complement the on-street operation of Civil Enforcement Officers (CEOs), Westminster uses fixed cameras and mobile camera units to encourage compliance with moving traffic regulations. Cameras are the only means available to Westminster to enforce drivers carrying out dangerous manoeuvres on its roads, and by doing so we aim to improve road safety, and reduce congestion. These contraventions, by their nature, cannot be enforced by Westminster's on-street CEOs. This is set out on the council's website.

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

To allow for the lawful enforcement of moving traffic contraventions. To identify non-compliant parking or driving events, capturing evidence of a suitable quality to allow enforcement via Penalty Charge Notice (PCN) creation, against the appropriate motoring legislation under the Traffic Management Act (2004), Road Traffic Act (1991), and London Local Authorities and Transport for London Act (2003), The Data Protection Act (1998 and 2018), The General Data Protection Regulation (2018) The Human Rights Act (1998), The Regulation of Investigatory Powers Act (2000), and the Freedom of Information Act (2000).

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

The main objective is to assist in traffic management where it has been identified that compliancy with moving traffic regulations is low, to ensure the safe and efficient operation of the road network by deterring motorists from contravening road traffic restrictions and detecting those that do to improve road safety, ensure the free flow of traffic, and reduce congestion.

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

No. The footage can however be provided on request to the Police and Government agencies to assist in their investigations or prosecutions. The footage may also be provided on request to the City Council's Corporate Fraud team to assist in their investigations or prosecutions.

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

Action Plan

Westminster City Council continually examines the reason and rationale for the introduction or removal of traffic enforcement cameras at locations where there are concerns about non-compliance with the prevailing moving traffic restrictions, or where compliance has been deemed to have been met.

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?

All of Westminster's traffic enforcement camera activity is subject to a data protection impact assessment.

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

Action Plan

No. Westminster is committed to continually reviewing its traffic enforcement policy and regularly updates changes such as the introduction of new cameras in areas where compliancy has been identified as being low, and changes in policy on its appropriate webpage.

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?

The City Council has a documented procedure for handling complaints and freedom of information requests: <https://www.westminster.gov.uk/complaints> and <https://www.westminster.gov.uk/freedom-of-information>.

The City Council also details contact routes through which concerns can be raised about camera enforcement and Penalty Charge Notices on its main Parking page: <https://www.westminster.gov.uk/parking-tickets>.

The City Council provides a webpage dedicated to information on its use of CCTV at <https://www.westminster.gov.uk/cameras#contraventions-enforced-by-camera>. The webpage also provides separate links to request to view CCTV images and similarly provides further links to more detailed information on the Data Protection Act.

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

Action Plan

No. Westminster is committed to continually reviewing its traffic enforcement policy and regularly updates changes such as the introduction of new cameras in areas where compliancy has been identified as being low, and changes in policy on its webpage.

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?

Locations of cameras used for traffic management purposes in Westminster have been approved by our CCTV Governance Group and have passed a test of appropriateness. Our CCTV Governance Group acts as a single point of decision-making and accountability in relation to the deployment or removal of our cameras, or the commissioning or decommissioning of camera sites at locations across the borough. It ensures that the use of cameras is consistent, proportionate and coordinated in accordance with a test of appropriateness. This test ensures that cameras will only be deployed when: There is a clearly identified and evidenced issue of concern in terms of compliance with traffic management regulations at a specific location, the use of cameras is considered to be the most effective and appropriate intervention to address that issue, the test of appropriateness also requires an exit strategy to be in place before any new deployment is approved such as when cameras are decommissioned as a result of sustained improvements in compliance levels.

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 City Council has an appointed CCTV Governance Group that acts as a single point of decision-making and accountability in relation to camera enforcement, including the deployment or removal of our cameras, or the commissioning or decommissioning of camera sites at locations across the borough. The role is publicised on the website. Contact routes are provided on Westminster's Fair Processing notice and the Parking webpages. A direct contact route is being added to the camera enforcement page to make it easier for members of the public to contact Westminster directly concerning the operation of its traffic enforcement cameras

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?

Lines of responsibility are described in the City Council's Standard Operating Procedure and regular monthly review meetings ensure these are followed. In addition, all systems are password protected and are able to provide an audit trail of data handling, and incident and evidence documentation is retained to ensure lines of responsibility continues to be followed.

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..

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?

The Codes of Practice and Standard Operating Procedures manuals, evidence management procedures, system fault management procedures to maintain the integrity of the traffic enforcement cameras, are in place to ensure that all relevant legislation is complied with, and reviewed regularly to ensure traffic enforcement remains compliant. Staff training on directed surveillance to a relevant Security Industry Authority standard, the General Data Protection Regulations, and relevant traffic enforcement camera and Parking legislation is also in place.

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?

Currently there are 8 active officers using the system. Records of previous contractors' employees are not retained by Westminster's current traffic enforcement contractor.

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 CCTV Enforcement Reviewers complete the Association of London Government Transport Environment Committee (ALG-Tec) accreditation. A dashboard is also available for all staff to access relevant training material.

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

N/A. Westminster does not operate surveillance drones.

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

Yes

No

Action Plan

Procedures are detailed in the City Council's Kerbside Management Enforcement Code of Practice (KMECoP), the Standard Operating Procedure, the Corporate Code of Practice, and the London Council's CCTV Code of Practice. Westminster is committed to continually reviewing its traffic enforcement policy and regularly updates changes such as the introduction of new cameras in areas where compliancy has been identified as being low, and changes in policy on its webpage.

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 retention period varies depending on the status of the data. Rejected images/footage is retained for 15 days before deletion. Processed alerts where a Penalty Charge Notice has been issued is retained for a maximum of 6 months with the evidence packs being deleted once the evidence transfer to the City Council's PCN processing system (SiDem) is completed. Westminster does this in order to fulfil our statutory functions as a Local Authority, for the purposes described in the act of Parliament, as authorised operators and processors for enforcement of traffic enforcement, as well as to pursue other lawful/legitimate interests on behalf of residents and service users. This is set out in our Parking page <https://www.westminster.gov.uk/parking>, and in our Fair Processing Notice: <https://www.westminster.gov.uk/fair-processing-notice>. In addition, the General Data Protection Regulations (GDPR) and Data Protection Act 2018 recognise that organisations like Westminster City Council may collect information deemed Special Category data and/or criminal conviction and offences data, and details its purposes here: <https://www.westminster.gov.uk/processing-special-category-data>.

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

The system exports an evidence pack zip-file which is created at time of processing a PCN containing a number of files which include a video file, two or more images and an xml-file used for import into the PCN backend system. These files are never kept beyond the initial export and are deleted once transferred.

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

No, but Westminster is committed to continually reviewing its traffic enforcement policy and procedures.

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 images is strictly controlled by the traffic enforcement cameras Control Room Team Manager and in his/her absence the CCTV Control Room staff and is only retained for the purposes of moving traffic enforcement, or for the purpose of allowing motorists to view footage of their PCN online. Requests for images either as a result of Subject Access Requests (SAR) or other third party requests (For example: Solicitors) are processed through completion of a request form that is downloaded from the Council's CCTV webpage: <https://www.westminster.gov.uk/fair-processing-notice>.

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?

As a Local Authority Westminster City Council collects, holds and processes a considerable amount of information, including personal information about residents, people it provides services to, and other people. It does this to provide its services in the most effective and efficient way that it can. The council recognises that it has a duty to people whose information it holds to treat that information responsibly, keep it safe and secure, and process it correctly and proportionately. The council will ensure that it meets the conditions necessary for processing personal data lawfully and will ensure this is adequately recorded. Any transfers of data made will be in full compliance with all aspects of the UK Data Protection Act (2018) & GDPR.

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

The right of subject access under article 15 General Data Protection Regulations 2018 entitles an individual to see the information contained in personal data held by an organisation. and the procedure for making a Subject Access Request are detailed in the City Council's Fair Processing Notice: <https://www.westminster.gov.uk/fair-processing-notice>. This form is used to confirm the identity of the Data Subject (the person the information is about), the identity and authority of the applicant (if the requester is acting on direct behalf of the Data Subject) and to assist in locating Personal Data relating to the Data Subject. Requests may be submitted in electronic or hard copy format, will be acknowledged within 5 working days. The council will only action the request once the requirements set out in the Subject Access Request form have been met. Thereafter the council has up to 30 calendar days, as set out in the General Data Protection Regulations 2018 to comply with the request. Redaction takes place before evidence packs are transmitted from the Videalert Camera Management System to the Si-Dem PCN processing system so no facial recognition is available to identify an individual in the images.

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?

Westminster's internal Code of Practice, the Data Protection Act, GDPR, and the Freedom of Information Act are adhered to, and only the traffic enforcement camera Operations Manager & Westminster Client Unit deals with enquiries from third parties. Regular audits form part of the WCC quality management system.

42. Have you identified any areas where action is required to conform more fully with the requirements of Principle 7? Yes No

Action Plan

No, but Westminster is committed to continually reviewing its traffic enforcement policy and procedures.

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?

Westminster's traffic camera enforcement system utilises Vehicle Certification Agency (VCA) approved cameras, and a fully hosted system based on a Microsoft HyperV virtual server environment. Westminster access a dedicated virtual Windows 2012 server, a safe and secure method to maintain data security and integrity. All of the server storage is run on a dedicated secure RAID-5 array and RAID-5 NAS storage.

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

The surveillance systems are installed and maintained in conformance with other relevant industry Standards. The City Council undertook a technical review of the traffic enforcement camera system in 2014 as part of the Parking contract Business and Processing Technology relet, which outlined the position of the system at the time, its aims and objectives, and proposals for potential system expansion.

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

No, but Westminster is committed to continually reviewing its technical processes and procedures.

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?

The Code of Practice and the CCTV and Surveillance Codes of Practice are followed and complied with. Secured premises, system user name and password protected. An Information Security Policy is followed to ensure safeguarding and integrity is maintained. Also, system logs and paper based logs provide a full audit trail of camera used and data copied.

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?

All appropriate IT security policies in place for user accounts and permissions. Application has security table profiles and audit facilities. The information is transferred via secure SFTP to Centrality (who maintain the integrity of the system) who then transfer the files internally to the Si-Dem server for import into the system.

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

Checklists and audits (both internal and external BSI). Internal Code of Practice, London Councils Code of Practice, Standard Operating Procedure, WCC retention policies.

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. Westminster does not use drone mounted surveillance cameras.

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 Westminster currently does not use 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, but Westminster is committed to continually reviewing its processes and procedures.

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?

Data is regularly reviewed to monitor compliance with moving traffic restrictions, and to ensure the use of the system remains necessary and proportionate. For example: If a location is deemed compliant, camera enforcement ceases and the camera unit is removed.

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

Westminster uses cameras to enforce moving traffic regulations as the only currently means available and in doing so deter drivers from carrying out dangerous manoeuvres on Westminster's roads, improve safety and reduce congestion.

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

All systems are monitored and system maintenance is performed on a daily basis to ensure it remains effective in meeting the purpose of moving traffic and parking enforcement. Any system upgrades follow a robust user acceptance testing process and have provision to be regressed if the upgrade fails testing.

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

Yes

No

Action Plan

No, but Westminster is committed to continually reviewing its processes and procedures.

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?

Full stakeholder engagement was carried out in developing the installation of the video analytics system designed to complement the on-street operation of CEOs. When our Parking Business Process and Technology contract was relet in 2014 the City Council worked with its enforcement contractor to critically review CCTV operations in respect to efficiency and effectiveness; identify any transformational changes that were required, and ensure that traffic camera enforcement would remain proportional to need. We also follow evidential requirement guidance and direction from the London Tribunals' Parking and Traffic Adjudicators in connection with our appeal submissions for cases taken to appeal.

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, but Westminster is committed to continually reviewing its processes and procedures.

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?

Currently none. Our system is solely used for the enforcement of moving traffic contraventions

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

When a moving traffic contravention is identified Details are then recorded on Westminster's Parking case management system SiDem.

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 policies are set out in the City Council's internal Code of Practice, Retention policies, the Standard Operating Procedure, the Privacy Impact Assessment, the London Council's CCTV Code of Practice, and in line with the General Data Protection Regulations and UK Data Protection Act (2018).

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

No, but Westminster is committed to continually reviewing its processes and policies in line with the Code of Practice and relevant legislation.