

# 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	Leicestershire Police
Scope of surveillance camera system	Multi camera CCTV system on mobile speed enforcement vans
Senior Responsible Officer	Kerry Smith
Position within organisation	T/ACC and Senior Information Risk Officer
Signature	
Date of sign off	August 2022

## 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?

Leicestershire Police use vehicles equipped with speed enforcement cameras (Camera van). The vehicles are deployed at pre-determined sites against a criteria agreed by the Leicester, Leicestershire and Rutland Road Safety Partnership (LLRRSP) which may include, but not exclusively, to where there have been clusters of injury collisions and where a high proportion of traffic exceeds the speed limit.

The camera equipment used is the Laser Tech LTi 20-20 Ultralite Concept CF version, a Home Office Type Approved (HOTA) device. The camera is positioned in the rear of the camera van and films out of the rear window. It will capture an image of the front of the offending vehicle if it is travelling towards the rear of the van, or an image of the rear of a vehicle travelling away from the rear of the van. In either case it is imperative that the registration number is captured, in order to identify the perpetrator.

Motorcycles and motor tricycles registered on or after 1st September 2001 must only display a number plate at the rear of the vehicle. Such vehicles registered before 1st September 2001 can also display a number plate at the front, but this is not mandatory. Because such vehicles do not have to display registration numbers to the front and rear, offenders can avoid detection, despite having committed an offence.

The addition of a multi camera CCTV system fitted to the side of the mobile speed enforcement vans, allows for all vehicle types, irrespective of the positioning of their registration plate to be detected and subsequently reported for process by providing Leicestershire Police with the best evidence of vehicles and their occupants.

Whilst there is an expectation that officers provide accurate written records of incidents, visually recorded evidence corroborates the opinion of the officer and provides an accurate record of an incident, thereby reducing error and provides mitigation against challenges. Citing an additional recording capability enables the Chief Constable to meet his legal obligation to bring offenders to justice.

The use of both the rear facing and additional side CCTV camera system provides an accurate, open and transparent record of the incident which is disclosable in any prosecution.

The Chief Constable also has a duty of care to the speed camera operators. The additional multi camera CCTV system provides additional safety and security reassurance for those carrying out this type of enforcement by the recording of interactions and approaches from members of the public.

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

The addition of the multi camera CCTV system will ensure all offenders are brought to justice.

Data Protection Act 2018 Part 3 allows Leicestershire Police to act as a competent authority and process personal data including Special Category information for the prevention, investigation, detection or prosecution of criminal offences.



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

Exceeding the speed limit is an offence under section 89 of the Road Traffic Regulation Act 1984.

Sections 23 and 40 of the Road Traffic Act (RTA) 1991 introduced a new section 20 into the Road Traffic offenders Act (RTOA) 1988 which allows evidence collected on camera to be used in proceedings for a speeding offence.

TA1991 inserted section 95A into the Highways Act 1980 to give highway authorities the power to install and maintain enforcement cameras on or near the highway.

These Acts combine to:

1. give local authority powers to install and maintain cameras;
2. provide Police with powers to require information about the identity of a driver;
3. allow evidence generated by enforcement cameras to serve as the only evidence against an offender (providing the technology is approved by the Home Secretary);
4. allow for a conditional offer of fixed penalty which can be sent through the post, allowing more offences to be dealt with.

The aim of the Leicester, Leicestershire and Rutland Road Safety Partnership (LLRRSP), through collaborative working, is to reduce the number of killed and seriously injured on the highway network in the Partnership (Police force) area. The Partnership seeks to achieve this through the provision of services for camera enforcement, in addition to evidence-based programmes of road safety education, training and promotion. The partnership seeks to reassure communities that road safety is a key priority.

Leicestershire Police, on behalf of the LLRRSP continually examines the reason and rationale for the introduction or removal of mobile speed enforcement sites at locations where there are clusters of injury collisions and where a specified proportion of the traffic exceeds the speed limit.

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

Yes

No

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

**Action Plan**

None

## 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?

 for camera systems with relevant type approval of a prescribed device under Section 20 of the RTOA 1988 used exclusively for enforcement purposes, which captures and retains an image only when the relevant offence is detected and with no capacity to be used for any surveillance purpose.

The main system used in mobile speed enforcement vans, the LTi 20-20 Ultralite Concept CF version is Home Office Type Approved, but the multi camera system that works alongside is not and therefore subject to this assessment.

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6. Have you identified any areas where action is required to conform more fully with the requirements of Principle 2?

Yes

No

**Action Plan**

Data protection impact assessment completed October 2021; reviewed May 2022 for the multi camera CCTV system that is installed in safety camera vans which works alongside the LTi 20-20 Iltralite Concept CF version which is a prescribed device under Section 20 of the RTOA 1988.

### 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?

All police complaints follow legislation and the Independent Office for Police Conduct (IOPC) guidelines.

If a complaint is made to the IOPC, they'll forward it to Leicestershire Police who will follow the same process as if it had been contacted directly.

Any request for footage which is wholly relevant to an offence that has been detected by camera can be requested from the Road Safety Unit

Any request for footage that is not directly relevant to an offence that has been detected can be made to Information Management.

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

#### Action Plan

Question 10 - officers are issued body worn cameras and adhere to force procedures for these cameras.

## 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?

Camera locations used for speed enforcement purposes in Leicester, Leicestershire and Rutland are pre-determined using set criteria and take due regard to the Department of Transport circular 01/2007 "Use of Speed and Red-light cameras for traffic enforcement: guidance on deployment, visibility and signing".

Enforcement is undertaken after certificated training has been completed and in accordance with the National Police Chief's Council (NPCC) "Guidance for the Operational use of Speed and Red-Light offence Detection Technology "

A standard operating procedure governing the use and retention of captured footage is in place. Current practice is that officers are required to activate the recording at the start of each and every enforcement session. Only evidence relating to offences progressed for process is downloaded so that it can be exhibited alongside the evidence from the prescribed device under section 20 of the RTOA 1988.

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 / senior responsible officer for surveillance camera governance arrangements is Leicester Polices Director of Intelligence currently Detective Superintendent James Avery. Leicester Polices 'How we use surveillance cameras' webpage has details on the deployment of surveillance cameras and contact details of the single point of contact / senior responsible officer

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?

The post of Road Safety Unit Manager assumes operational responsibility for speed camera enforcement.

There are clear lines of communication from the Camera Team Leader to officers who use vehicles fitted with this CCTV system.

All evidential footage and its processing is documented in the chain of evidence for offences processed

All officers using the system are required to have completed proprietary certificated training in the use of this system which is delivered by Laser Tech UK Ltd who are the sole supplier of the system in the UK

The Camera Team Leader is responsible for DIP sampling recordings

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

Question 15 – Details of and publication of the SPoC is to be confirmed imminently.

Not an Action but an explanation to  Question 18 - the system is wholly operated by Safety Camera Scheme speed enforcement officers.

## 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?

It is custom and practice for refresher training for the Speed Enforcement Officers every 3 years for both the HOTA approved and multi camera CCTV system by the equipment supplier, Laser Tech UK Ltd.

The camera team leader is responsible for sampling the quality of the footage recorded and provides feedback to officers individually.

Offences are adjudicated by another officer for validity of processing.

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?

Not applicable

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?

Officers receive proprietary certificated training in the use of the system from Laser Tech UK Ltd who are the sole supplier of the system in the UK.

Speed enforcement officers are accompanied by a competent certificated user of the equipment for an initial period (usually 3 months) before they are allowed to operate on their own.

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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?

This assessment relates to a multi camera CCTV system installed in safety camera vans.

It is only used whilst enforcement is being carried out at pre determined locations in Leicester, Leicestershire and Rutland.

Speed Enforcement Officers are issued with body worn cameras and receive instruction in their use and adhere to force procedures for these cameras which is being handled seperately.

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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

This assessment relates to a multi camera CCTV system installed in safety camera vans.

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

Yes

No

**Action Plan**

## 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?

Evidential recordings are retained for 36 months as this supports the prosecution process.

Laser Tech UK Ltd, the sole supplier of this equipment in the UK, for non evidential recordings:

The Commander 4Vision holds approximately 2-3 months of footage (this varies according to the quality settings) before automatically overwriting the oldest first.

The Commander 3 system (newer) holds 72 hours ( approximately 2-3 months) worth of footage before overwriting the oldest first.

Leicestershire Police operates both variants of the system.

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

The system automatically overwrites the storage medium (computer hard disc) once it is full, deleting the oldest recordings first.

Refer to response to question 30 for further details

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

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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?

Only the management and staff of the SCS Safety Camera Team who require it, have password access to the images and information retained by the system, so that offences detected can be processed in accordance with any national legislation, regulations and guidelines.

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?

Leicestershire Police has a comprehensive firewall in place to prevent cyber attacks to its systems.

Data storage is managed by physical means with restricted access.

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

Any Subject Access Requests received are forward to the Leicestershire Police Information Management Department

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?

None - Information has not been shared with third parties to date.

Leicestershire Police has a variety of Information Sharing Agreements with other competent agencies/authorities. Any requests for information are handled by the Management Information Department.

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

Yes

No

**Action Plan**

Not an action but an explanation to Question 37 - Offence images are provided to notice holders on request to assist in the identification of driver details. Images are only sent to noticeholders that are current at the date of request on Pentip, Police National Penalty Notice Processing System.

## 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?

Information is captured using a suitable device which is time and date stamped. The information is exhibited as an original and locked for editing unless masking/pixelation is required, completed by an adjudication officer at the Road Safety Unit.

Officers receive guidance on the storage and retention of information to ensure standards are met.

All staff using and accessing the data are vetted to Police recruitment vetting standards, renewable every 10 years.

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

Ongoing review of processes and procedures in relation to the usage and storage of data. Dip sampling and auditing of the system.

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

## 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 systems installed in the safety camera vans are standalone systems. All recordings are time stamped and stored securely under password protection to mitigate the risk of data being lost/stolen from vehicles.

The safety camera vans, when not in use are kept locked in their own garage at Leicestershire Police Headquarters to which there is restricted access.

Evidential recordings are downloaded and secured following the conclusion of the incident.

Evidential recordings are kept on the systems within the vehicles as detailed in the response to principle 6, question 30.

Capability of system to prevent viewing or export by unauthorised persons - The device is large and mounted within the speed camera van and requires password access. to prevent unauthorised persons from accessing it.

Due to the type of camera, personal information held is minimal and only captured whilst speed enforcement is being carried out.

The personal data recorded is the vehicle registration number of vehicles passing through a site whilst enforcement is taking place.

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?

Leicestershire Police has a comprehensive firewall in place to prevent cyber attacks to its systems.

Physical media is stored in a secured area with restricted access.

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

Data is captured and stored in an appropriate manner in line with standard operating procedures.

Images should only be accessed and viewed by persons who have a lawful and necessary policing purpose in line with their job role; any breach of this policy becomes a Leicestershire Police professional standards matter.

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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?

Not applicable

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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?

Not applicable for this system

Body worn cameras are subject to a sperate policy and procedure

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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**

## 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?

Access to the system is specific for the role, so only the speed enforcement officers have password access to it. The equipment does not record and audit log and therefore not checks can be made on its use, however each officer has his/her own van and therefore it is easy to identify who has been using which set of equipment and van by vehicle log book records and primary (enforcement) records sheets that are completed for each period of enforcement (each site visited during a shift).

 is regularly reviewed to monitor compliance with speed enforcement offences and legislation to ensure that use of the system remains necessary and proportionate.

Speed camera enforcement locations are regularly reviewed with new sites being added and decommissioned as appropriate.

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

On initial deployment, only two of the vehicles had this system installed. Those vehicles were better equipped to accurately record the registration number of vehicles only required to display a single number plate, not having to rely on the officers written record, which at times incorrect.

The Partnership Board subsequently approved installation to all vehicles in 2010 as this

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

The system is supplied and maintained by the same system supplier as for the main enforcement system supplied as a prescribed device under S20 RTOA 1988 for which annual calibration is carried out.

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

Yes

No

**Action Plan**

## 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?

Engagement with Crown Prosecution Service

The process used is the same as for the main equipment, a prescribed device under S20 RTOA 1988 with exhibits requiring highlighting in prosecution files.

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

## 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?

This assessment relates to a multi camera CCTV system installed in safety camera vans which does not use automatic number plate recognition or automatic facial recognition software.

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

Not applicable

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?

Not applicable

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

For questions 67 and 68 – work is being carried out with records management to confirm retention periods and whether particular procedures need to be implemented with regards to the retained footage, to ensure it is accurate and up to date.