



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.

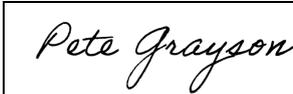
What should I do next?

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	Lincolnshire Police
Scope of surveillance camera system	Lincolnshire Police operates an Automatic Number Plate Recognition (ANPR) system using both fixed and mobile ANPR infrastructure. The purpose of this self-assessment is to ensure when operating the ANPR system, it used in compliance with the Surveillance Camera Code of Practice.
Senior Responsible Officer	Detective Superintendent Peter Grayson
Position within organisation	Director of Intelligence
Signature	
Date of sign off	18/02/22

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?

Automatic Number Plate Recognition (ANPR) is operated by Lincolnshire Police across the county using both fixed and mobile unit ANPR cameras. ANPR is being used for the purpose of reducing crime and bringing offenders to justice. Fixed site infrastructure has been developed as a consequence of locations being identified through analytical work undertaken to prevent and detect crime throughout the county and across its borders in relation to counter terrorism, serious, organised and major crime and local crime. Mobile ANPR is fitted to a number of police vehicles which are based across Lincolnshire.

The use of automatic number plate recognition (ANPR) technology is to help detect, deter and disrupt all levels of criminality in Lincolnshire. This includes tackling travelling criminals, organised crime groups and terrorists. ANPR provides lines of enquiry and evidence in the investigation of crime. It is used by Law Enforcement Agencies (LEAs) throughout England, Wales, Scotland and Northern Ireland.

As a vehicle passes an ANPR camera, it reads the registration number. It is instantly checked against database records of vehicles of interest and where there is a match, Police Officers can then intercept and stop a vehicle, check it for evidence and, where necessary, make arrests.

The ANPR infrastructure stores a record of all vehicles passing a camera in line with national data retention periods, including those that are not of interest at that time. If appropriate, and with the correct authorisation, authorised users can access an ANPR record for investigation purposes.

The use of ANPR in this way has proved to be important in the detection of many offences including:

- locating missing and vulnerable persons
- locating stolen vehicles
- tackling uninsured vehicle use
- solving cases of terrorism and major organised crime

It also allows Police Officers to focus on vehicles of interest, allowing law-abiding drivers to continue unhindered.

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

The operation of overt surveillance camera systems in public places by Lincolnshire Police is in accordance with Section 33(1) Protection of Freedoms Act 2012 and the Secretary of State's Surveillance Camera Code of Practice.

The processing will be under the Law Enforcement Directive within Part 3 of the DPA 2018. Lincolnshire Police is a competent authority under the relevant legislation and has a duty to deter and detect crime. The Force also has an obligation to gather evidence under the Police & Criminal Evidence Act 1984 and then retain and disclose such material under the Criminal Procedure and Investigation Act 1996. Any ANPR data is kept in accordance with Lincolnshire Police Policy PD175 and the Management of Police Information (MOPI) and is also supported by Lincolnshire Police Information Assurance Strategy, Standards and Working Practices and associated policies that provides guidance on information management which underpins Lincolnshire Police legal, and national guidance and standards relating to information management.

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

Automatic Number Plate Recognition (ANPR) is being used for the purpose of reducing crime and bringing offenders to justice. Fixed site infrastructure has been developed as a consequence of locations being identified as a result of analytical work undertaken to prevent and detect crime throughout the county and across its borders in relation to counter terrorism, serious, organised and major crime and local crime

A National Survey carried out during 2021 highlighted 89% of respondents in the East Midlands including Lincolnshire support the increased deployment of ANPR cameras for policing purposes.

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

Yes

No

N/A

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

Action Plan

None Identified

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 fixed site camera locations undergo a Data Protection Impact Assessment and this is reviewed on an annual basis.

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

Action Plan

N/A

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?

Any concerns or complaints about the use of ANPR will be directed to the Lincolnshire Police website where instructions are given how to raise a complaint online, in person or in writing and the steps that will be followed in processing any complaint.

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

Action Plan

N/A

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 Force ANPR policy PD175 identifies roles and responsibilities surrounding the development, support, management and use of ANPR data and cameras.

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 Chief Constable is the Data Controller for Lincolnshire Police ANPR and this is documented on the Lincolnshire Police website

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?

Staff at all levels must comply with the Force ANPR Policy, which sets out the rules around responsibility and accountability for ANPR systems and data. There is a segregation of roles and staff access to the ANPR systems is controlled depending on the role being carried out. Weekly, monthly, quarterly and annual auditing is carried out to ensure compliance.

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

N/A

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?

Training plans are in place consisting of a combination of classroom learning, online and peer training as well as evidence based learning. Regular performance reviews carried out which includes highlighting any training requirements when in a particular role.

Mandatory annual training is carried out on Data Protection and Information Security.

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?

N/A

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?

Training plans are in place consisting of a combination of classroom learning, online and peer training as well as evidence based learning. National systems require College of Policing courses with pass rates to be completed before access is granted. Regular employee / line manager meetings review performance and highlight any additional training requirements for that role.

Mandatory annual training carried out on Data Protection and Information Security.

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

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

Yes

No

Action Plan

N/A

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?

Data retention is aligned to the National ANPR Standards for Policing (NASPLE) and is proportionate for its use under the Police & Criminal Evidence Act 1984 and retention and disclosure of material under the Criminal Procedure and Investigation Act 1996. Currently ANPR 'read' data, plate patches and overview images are held for 1 year. Data required to be retained for evidential purposes is exempted from this.

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

Local force systems that capture and store ANPR data are automatically set to store data for a rolling 7 days period. National ANPR systems are set to store data for one year. National data required to be retained for evidential purposes is exempted from this.

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

N/A

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 ANPR system functionality is allocated in accordance to an individual's department and their role within that department using access controls. Access levels are set and managed by the ANPR Manager

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?

Lincolnshire Police have in place Information Assurance Strategy, Standards and Working Practices which include IT Security and Communications Standards to guard disclosure of information against cyber security risks.

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

The Lincolnshire Public website contains details on requesting information via a National Subject Access Request Form which outlines the process and what happens next. The process and next steps information is also available on the Lincolnshire Police website.

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?

Lincolnshire Police Information Assurance Strategy, Standards and Working Practices outlines roles and responsibilities and audit process to ensure decisions about sharing information are clearly documented and recorded and compliance checks are in place.

There are additional Policy documents supporting the process including Lincolnshire Police policy on Information Sharing PD132

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

Yes

No

Action Plan

N/A

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?

The performance of the ANPR infrastructure and systems is monitored and measured against the National ANPR Standards for Policing and Law Enforcement (NASPLE)

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

NASPLE documents the processes and procedures to be carried out at installation and during the lifecycle the ANPR device is in use. NASPLE tests are carried out and recorded at the time of installation. Once installed performance of the camera is monitored at regular intervals for read rates to ensure accuracy is maintained. A 12 month maintenance schedule is carried out on all cameras along with annual NASPLE testing. All testing and maintenance is recorded.

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

N/A

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?

Access to Lincolnshire Police networks and systems is access controlled with access given to systems based on an individual's department and their role within that department. ANPR system access levels are set and managed by the ANPR Manager.

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?

Lincolnshire Police networks and systems are monitored by the National Security Centre. Annual penetration tests of applications, infrastructure and networks are carried out using accredited security organisations. Action plans are produced and completed to mitigate any risks.

Results of tests are documented and actioned upon as part of Lincolnshire Police Compliance with the NPIRMT Governance and Information Risk Return (GIRR). The Information Assurance Strategy requires that the force submit a review of GIRR to the National Information Risk Management Team (NPIRMT), in line with the PSN submission to Government Digital Services(GDS)

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

The storage, use and access of ANPR system images and information is defined in the National ANPR Standards for Policing and Law Enforcement (NASPLE)

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 in the scope of this assessment

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 in the scope of this assessment

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

N/A

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?

Annual Data Protection Impact Assessments are carried out for each site. In addition regular Strategic Infrastructure reviews are carried out to ensure existing systems remain proportionate and to identify any gaps as a result of changes in criminal behaviour since the last review. Compliance with DPIA assessments and strategic reviews is reported to the NPCC National Portfolio Office on a quarterly basis for public publication.

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

N/A

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

NASPLE documents the processes and procedures to be carried out at installation and during the lifecycle the ANPR device is in use. NASPLE tests are carried out and recorded at the time of installation. Once installed performance of the camera is monitored at regular intervals for read rates to ensure accuracy is maintained. A 12 month maintenance schedule is carried out on all cameras along with annual NASPLE testing. All testing results are recorded.

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

Yes

No

Action Plan

N/A

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?

As part of the implementation of the National ANPR Service, consultation and a Memorandum of Understanding was put in place between the Police and the Crown Prosecution Service to document the guidance on quality requirements for evidential purposes. More detail is also documented in the National ANPR Standards for Policing and Law Enforcement (NASPLE). Strict guidelines are also defined on what is to be provided for evidential purposes and systems are configured to ensure information provided is in the correct format with the correct data classification markings and is fully auditable.

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

N/A

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?

Automatic Number Plate Recognition is operated by Lincolnshire Police across the county using both fixed and mobile unit ANPR cameras. Automatic Number Plate Recognition (ANPR) is being used for the purpose of reducing crime and bringing offenders to justice.

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

As a vehicle passes an ANPR camera, it reads the registration number. It is instantly checked against database records of vehicles of interest and where there is a match, Police officers can then intercept and stop a vehicle, check it for evidence and, where necessary, make arrests.

The ANPR infrastructure stores a record of all vehicles passing a camera in line with national data retention periods, including those that are not of interest at that time. If appropriate, and with the correct authorisation, authorised users can access an ANPR record for investigation purposes.

Vehicles of Interest are determined at both a National and Force Level and contain records of vehicles that are not compliant with Road Traffic Laws or linked to criminal activity. Vehicles on lists must be reviewed every 28 days as a maximum as set out in the National ANPR Standards for Policing and Law Enforcement (NASPLE)

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?

Data retention periods are defined in the National ANPR Standards for Policing and Law Enforcement (NASPLE).

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

N/A