

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	West Mercia Police
Scope of surveillance camera system	Automatic Number Plate Recognition - Fixed Site
Senior Responsible Officer	Stuart Bill
Position within organisation	Superintendent, Force Operations
Signature	
Date of sign off	4/3/26

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) technology is a critical law enforcement capability used to detect, deter and disrupt criminality at a local, regional and national level, including Organised Crime Groups, people traffickers, serious sexual offenders and terrorists. ANPR is also used to protect vulnerable people from harm.

West Mercia Police operate ANPR under three main capabilities - real time operational response to ANPR alarms relating to vehicles of interest; intelligence development and investigative capability.

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

ANPR operates under a complex framework of legislation of general application, including the Data Protection Act 2018, UK General Data Protection Regulation (UKGDPR), and Common Law.

The National Law Enforcement ANPR Capability (NAC) is subject to the Information Commissioner's Office (ICO) regulatory provisions.

The use of ANPR is also overseen by the Office of the Biometric and Surveillance Camera Commissioner (OBSCC). Compliance with the BSCC Code of Practice is proactively measured and published by the National ANPR Portfolio in their bi-annual compliance survey of law enforcement agencies using national ANPR systems.

National ANPR Standards for Policing and Law Enforcement (NASPLE) govern the use of ANPR by police and law enforcement agencies.

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

In line with National ANPR standards for Policing and Law Enforcement (NASPLE) West Mercia Police conduct an annual ANPR strategic assessment to identify strategic threats necessitating ANPR deployment at a specific location to detect, deter and disrupt criminality.

Data Protection Impact Assessments (DPIA) are conducted annually for all cameras to ensure the rights of individual privacy are considered and balanced against the need to protect the public from harm. Cameras which are not deemed to be in a location of pressing social need are decommissioned.

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

Yes

No

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

Action Plan

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?

N/A A DPIA has been completed to cover ANPR as a whole and individual DPIAs are completed annually to cover each camera site

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

Action Plan

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?

There is a section of the West Mercia Police external website dedicated to complaints to allow for members of the public to register concerns or queries online.

If complaints are made linked to ANPR the ANPR lead will be engaged to support the investigation and consultation with the ANPR Senior Responsible Officer will be done where appropriate.

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

Action Plan

Physical signs are not deployed across the force area to advise the public that ANPR is in operation in the area as this would be of benefit to offenders and significantly reduce the effectiveness of the technology.

The Force website has full detail on how and why ANPR is used by West Mercia.

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?

West Mercia Police have an ANPR policy in place with designated Strategic and Tactical Leads.
West Mercia are engaged with regional and national governance groups

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 ANPR Manager acts as the single point of contact for ANPR enquiries, liaising with the relevant stakeholders dependent upon the detail.

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?

Access to ANPR data is dependent upon job role and only ever provided following training being completed. West Mercia utilise the nationally provided ANPR computer based training for the National ANPR Service which include detail about NASPLE and data handling. Classroom based training is also mandated for all advanced users of the National ANPR Service.

The West Mercia Police ANPR policy is available to all staff on the intranet.

ANPR is subject to audit which is independently undertaken by the Information and Compliance Department. West Mercia follow the NASPLE Audit and Compliance standards.

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

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?

Prior to access to the ANPR system being authorised staff are required to complete relevant training to include an understanding of NASPLE. West Mercia maintain a library of useful documents on the force intranet site alongside training guidance. Staff use of the ANPR system is independently audited by the Information and Compliance department.

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?

Access to the National ANPR Service is only granted following completion of College of Policing approved CBT packages or face to face training for advanced access

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?

Access to the National ANPR Service is only granted following completion of College of Policing approved CBT packages. Access to local ANPR is also dependent upon successful completion of training with reference to NASPLE

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

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?

West Mercia Police comply with national standards around ANPR data retention. ANPR data is retained for 12 months unless it is required to be preserved under the Criminal Procedure and Investigations Act or Management of Police Information. Data that is retained over 12 months is regularly reviewed and deleted where a continued CPIA requirement for retention cannot be identified.

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

Automated weeding of images and meta data is set up on NAS and local BOF

32. When it is necessary to retain images for longer than your routine retention period, are those images then subject to regular review?

Yes

No

33. Are there any time constraints in the event of a law enforcement agency not taking advantage of the opportunity to view the retained images?

Yes

No

34. Do you quarantine all relevant information and images relating to a reported incident until such time as the incident is resolved and/or all the information and images have been passed on to the enforcement agencies?

Yes

No

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

Yes

No

Action Plan

Principle 7

Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.

36. How do you decide who has access to the images and information retained by your surveillance camera system?

Access to ANPR data is aligned to NASPLE access requirements with all access subject to audit.

37. Do you have a written policy on the disclosure of information to any third party?

Yes

No

38. How do your procedures for disclosure of information guard against cyber security risks?

The ANPR system is subject to security compliance testing to prevent against security risk. Protective monitoring is in place to monitor system security.

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

Subject Access Requests are aligned to the National ANPR Service Rights of Data Subjects Notice which is available on the Force internet site.

All Freedom of Information Requests are dealt with by the Disclosure Unit with contact made with the ANPR Manager where required

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?

NASPLE provides the detailed rules for disclosure of ANPR data. West Mercia Police will only provide data where appropriate in law and introducing ANPR into evidence for court requires a strict protocol to be followed.

A minimal number of staff number are authorised to disclose ANPR data and these staff have to undergo additional training to be provided access to do this. Any disputes in disclosure requests are referred to the Tactical or Strategic Leads.

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

Yes

No

Action Plan

Potential development of disclosure request procedure is to be looked at in the coming months to ensure a full and easily accessible audit trail of all requests

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?

West Mercia Police have a focus on adhering to the National ANPR Standards for Policing and Law Enforcement.
All cameras are monitored to ensure data accuracy with support and maintenance contracts in place to fix any faults that may arise.

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

In compliance with NASPLE all cameras are tested on installation and then subject to annual performance testing. Camera performance is monitored and we have service and maintenance contracts in place to fix faults that arise.

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

Camera performance monitoring is being widened to ensure monitoring over a 24 hour period.

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?

West Mercia Police adhere to NASPLE standards for access with adequate security measures in place for access control and appropriate firewalls to protect the system from unauthorised external connections.
Access to data is restricted to staff who require it and then is subject of individual login with relevant permissions assigned to their job role. Access is removed from a staff member who no longer requires access due to role change. This area of ANPR forms part of the audit process

48. If the system is connected across an organisational network or intranet, do sufficient controls and safeguards exist?

Yes

No

49. How do your security systems guard against cyber security threats?

The ANPR system is subject to security compliance testing to prevent against security risk.

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

West Mercia Police comply with NASPLE requirements for storage, use and access to ANPR data

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

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

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?

An annual review of camera locations is conducted to determine whether continued data collection at sites is justified as necessary and proportionate with a full strategic assessment undertaken every 3 years.
Data Protection Impact Assessments are conducted on each camera site annually which are reviewed by the Data Protection Office, Information Security Manager and signed off by the SRO

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

The ANPR strategic assessment is the essential source of information when reviewing ANPR deployments with data collection being ceased from sites which are no longer deemed to have policing challenges or where less intrusive techniques would achieve the desired outcome.

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

The service and maintenance agreements we have in place ensure a continued ANPR capability is available. Contracted SMEs are available to restore service in times of outage in line with agreed service level agreements for a critical system

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

Yes

No

Action Plan

Q55 - If cameras are identified as not being proportionate to continue data collection at the site they will be removed from the location

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?

The NAS was subject to national engagement in development and West Mercia Police had representation on the national evidence working group which was comprised of ANPR SMEs and CPS in the development of evidential exhibits and statements to be produced from NAS.

West Mercia Police have representation within the National Strategic ANPR Platform Working Group developing the capability for supplier integration to the NSAP to ensure the quality requirements.

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?

ANPR is used within West Mercia to detect, disrupt and deter serious organised criminality using the road network at a local, regional and national level.

The ANPR system is used in three fundamental ways - to monitor for real time threats travelling within the area, to allow for intelligence development and to aide in investigative opportunities. ANPR provides an essential source of data to help in tackling local criminality, serious organised crime and terrorism.

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

The main reference database for ANPR is the Police National Computer. National College of Policing policy provides the detail for the inclusion of vehicles on the PNC. All requests for inclusions of vehicles on a reference database are subject of review by an independent department to ensure proportionality of request. All requests and responses are fully auditable and reviews of vehicles included on vehicle of interest lists are in line with NASPLE requirements.

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?

West Mercia Police follow NASPLE with regard database entries with entries being set for a maximum period of 28 days from initial entry

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