



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	Greater Manchester Police
Scope of surveillance camera system	NEC Neoface Facial Recognition system for the purpose of overt Live Facial Recognition. Up to four high definition cameras deployed in two overt vehicles designed for this specific purpose. The cameras are locally managed and controlled from within the overt vehicle and deployed to a fixed geographic area for a specific, intelligence led operation.
Senior Responsible Officer	Det Chief Supt Neil Jones
Position within organisation	Interim Head of Intelligence
Signature	
Date of sign off	Oct 2025

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?

The problem definition and purpose of the system are contained within the published GMP Data Protection Impact Assessment (DPIA), held on www.gmp.police.uk

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

The lawful basis for the use of this surveillance tactic is documented in the GMP Live Facial Recognition Legal Mandate document, held on www.gmp.police.uk

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

The necessity and proportionality factors for the use of this surveillance tactic is documented in the GMP Live Facial Recognition Legal Mandate document, held on www.gmp.police.uk

Additional necessity and proportionality factors are considered by the Authorising Officer (minimum Supt rank) for all individual deployments.

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

Yes

No

The overt vehicles which contain the cameras and CCTV for facial recognition also contain an authorised ANPR camera. As such, the overt vehicles may be deployed as a mobile ANPR camera in an overt capacity.

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

Action Plan

Additional details contained within the current version of the GMP DPIA - held on gmp.police.uk (LFR pages)

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?

DPIA in place - therefore not required in these circumstances.

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

Action Plan

Details are contained within the GMP DPIA and will be managed as the system goes live to improve:

- Data handling and security (networked solutions)
- Publication of deployment data and Equality Impact Assessment data.
- Annual audit agreement in place with Greater Manchester Combined Authority

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?

As per GMP standard complaints process - documented and held on www.gmp.police.uk
The Live Facial Recognition team will act as force experts in responding to matters raised working with the Professional Standards Directorate.

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

Action Plan

Additional details contained within the current version of the GMP DPIA - held on gmp.police.uk (LFR pages).

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?

GMPs standard operating procedures document the governance arrangements. A full list of parties to the engagement process is held by GMP.

The GMP strategic lead is Assistant Chief Constable Rick Jackson with the tactical management of LFR being held by the Chief Supt (Head of Intelligence). Technical and operational leads are appointed in support of the Head of Intelligence to deliver LFR on a daily basis.

LFR deployments will be individually supported by a GSB structure and an independent authorising officer (minimum rank of Supt)

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>

Greater Manchester Police has a duty to ensure, so far as is possible, that all staff comply with the provisions of the UK GDPR and the Data Protection Act 2018, particularly relating to their access to, and dissemination of, a wide variety of personal information and intelligence.

For further information on Data Protection, you should refer to the Force Data Protection Policy or consult the Information Compliance & Records Management Unit by email dataprotection@gmp.police.uk.

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?

A dedicated LFR team is in place within GMP and all relevant staff are made aware of the roles and responsibilities relating to the LFR system. Training is delivered to all officers who are to partake in LFR deployments.

Lines of accountability and audit are contained within GMPs Standard Operating Procedures.

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

Additional details contained within the current version of the GMP DPIA - held on gmp.police.uk (LFR pages

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?

A dedicated team of LFR trained officers will be the sole users of the LFR system. From that team a minimum of two superusers will receive enhanced training.

Part of the authorising process is to document and ensure that all training is completed prior to any deployments.

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?

The occupational standards for this role are considered to be comparable to other occupational standards within GMP.

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?

A dedicated team of LFR trained officers will be the sole users of the LFR system. From that team a minimum of two superusers will receive enhanced training.

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?

BWV will be deployed and activated in line with the existing / published GMP BWV policy.

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

Not applicable at this time.

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

Action Plan

As documented in the GMP DPIA & GMP LFR documentation held on www.gmp.police.uk

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?

CCTV imagery will be retained routinely for a maximum 31 days. Watchlist data is deleted at the end of the LFR deployment or within 24hrs.

CCTV imagery retention will be considered in line with MOPI and CPIA stipulations.

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

All biometric templates of passers-by who do not generate an alert are automatically and immediately deleted by the LFR system.

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

Additional details contained within the current version of the GMP DPIA - held on gmp.police.uk (LFR pages)

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?

See GMP LFR Policy document.

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 GMP system is air-gapped from any external systems at this time. Audit capabilities exist and are documented in the GMP LFR Standard Operating Procedures.

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

GMP will manage SARs via the established process and portal on www.gmp.police.uk

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?

See GMP LFR Legal Mandate, Guidance, SOP and DPIA.

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

Yes

No

Action Plan

Additional details contained within the current version of the GMP DPIA - held on gmp.police.uk (LFR pages)

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 GMP LFR system is part of a national pilot scheme from the Home Office. GMP will utilise standard software and hardware provided by the National Biometric Team in line with Home Office requirements. GMP will follow the current College of Policing APP.

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

An independent annual audit by GMCA has been commissioned and a voluntary review by the ICO has equally been commissioned for 2026.

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

See GMP LFR DPIA and the GMP Standard Operating Procedures which set out standards and processes applicable.

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?

GMPs LFR system is stand alone and is "air-gapped" from any network connections at this time. All data is encrypted prior to upload.

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?

GMP LFR systems are currently standalone and air-gapped.

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

See GMP LFR Standard Operating Procedures

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

See GMP LFR Standard Operating Procedures

Principle 10

There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

54. How do you review your system to ensure it remains necessary and proportionate in meeting its stated purpose?

GMP works within the framework of the published legal mandate for LFR. The GMP LFR policy places responsibilities upon the Authorising Officer and requesting officer to ensure necessity and proportionality.

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

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

GMP is part of the national pilot and will review arrangements along with technical considerations as part of the national roll out.

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

Yes

No

Action Plan

See GMP Standard Operating Procedures & Policy documents.

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?

GMP has an overarching community impact and equality impact assessment. A bespoke CIA will be required for each deployment to ensure effective engagement pre / post deployment

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

See GMP Standard Operating Procedures.

Principle 12

Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

65. What use do you make of integrated surveillance technology such as automatic number plate recognition or automatic facial recognition software?

This assessment refers to LFR only.

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

GMP has a policy document which outlines both the "use case" for a watchlist along with the individual considerations for a persons inclusion on a watchlist. This follows the current published APP from the College of Policing.

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?

GMP DPIA and Standard Operating Procedures refer.

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

See GMP Standard Operating Procedures.