

Surveillance Camera Code of Practice Certification: Audit Preparation

The Surveillance Camera Code of Practice published in June 2013, sets out 12 guiding principles which strike a balance between protecting the public and upholding civil liberties. The principles provide a coherent and comprehensive structure to enable good and transparent decision-making that will reassure the public that surveillance systems are used to protect and support communities rather than the invasion of privacy.

The Code of Practice applies to the following modalities of surveillance:

- CCTV Closed Circuit Television
- BWV Body Worn Video
- UAS (Drones) Unmanned Aircraft Systems
- ANPR Automatic Number Plate Recognition
- AFR Automatic Facial Recognition

Organisations can select their scope of certification based on the camera systems they use. As code compliance is monitored annually through a process of annual audit, this scope of certification can be updated over time to align with an organisations evolving use of surveillance technology.

Next Steps:

Having decided to pursue this essential data and privacy certification, it is now time to look ahead and start preparing for your audit to ensure the day is a success.

As a brief recap, so far you have likely completed the following:

| Document: | Available From: |
|---|-----------------------------------|
| IQ Verify Online Application Form | IQ Verify Website (<u>Link</u>) |
| Surveillance Commissioner Self-Assessment | Commissioner Website (Link) |
| IQ Verify Client Contract | IQ Verify Representative |

Following the completion of the above, your audit date will be confirmed and you will be introduced to your allocated auditor to support the logistical arrangements for the day.

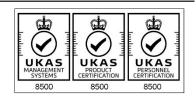
This is the case whether your one day audit is to be delivered on site or remotely.

IQ Verify will also provide you with an audit plan a few weeks prior to your audit to help clarify the timings of the day, inclusive of the various aspects under consideration by our auditor. A site tour will be required and so if you are working remotely, please ensure a representative is available who can facilitate a quick video call and tour with our auditor.

At this stage we often get asked by new <u>and</u> existing customers:

"What happens if I am missing something or don't quite meet a particular criteria on the day"

Firstly, **don't panic** – it happens and is often part of the process.





The purpose of an audit is to identify compliance with a particular standard; inclusive of areas of best practice, improvement opportunities and inadvertent omissions. It is the role of a Certification Body such as ourselves to support compliance through a process of impartial assessment that allows you to hone in on aspects being done well and those requiring improvement. Gaps - also known as non-conformities - are explained in the closing meeting by the auditor and further clarified in the confidential audit report issued following the conclusion of the audit.

Clients can then use the content of this report to address any areas of non-conformity and then submit evidence to IQ Verify confirming their satisfaction. As soon as this has been completed, you can be recommended to the Commissioner for formal Certification.

To support your audit preparation and successful certification, below are provided a sample list of documents and considerations our auditor will consider as part of assessing your compliance with the Surveillance Code.

Important Note:

It is important not be overwhelmed by this list of requirements – it is often the case that multiple of these are contained within one singular document or are referred to internally by different names. Our auditor will work with you to identify their relevance and application within your own business as part of the audit.

| Required Documentation/ Aspect of Review: | |
|---|--|
| Organisational Chart | Data Protection Policy |
| Code of Practice | ICO Registration Details |
| Operational / Procedures Manual | Staff Induction Records |
| Privacy Policy | SIA Licence Details for CCTV Operators |
| ANPR Policy | Training Records |
| Data Retention Policy | Maintenance Records |
| Data Privacy Impact Assessments | Signage |
| Objectives | Notice to Owner (blank copy) |
| Code of Conduct Policy | Audit Results (internal and external) |
| Staff Handbook | Insurances |
| Complaints Policy | Release of Data (e.g. police, third party, subject access requests etc.) |
| Complaint/ Feedback Log | Analysis data (e.g. number of PCNs issued /end of year report etc.) |

Once these documents are in place and you have been recommended for certification by IQ Verify, you will be awarded the Biometrics and Surveillance Camera Commissioner's Third Party Certification Mark for use on your company website/ communications/ marketing. Your organisation will also be featured on the government public facing register of code compliant organisations (<u>here</u>).

Better still, as your Code Compliance is monitored annually, once these documents are in place the annual renewal process becomes as simple as demonstrating to IQ Verify their continued application.

Please Remember: We are here to help.

If you have any questions please feel free to email or call us at any stage and we will do our do our best to support you through the process.

