



Body Worn CCTV Policy & Procedure Support Document

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Estates & Campus Services

University of Essex

VERSION CONTROL

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AUTHORISED BY:

Name	Role	Date
Chris Oldham	Director of Estates & Campus Services	01/02/2021
Tim Morris	Deputy Director of Estates & Campus Services	01/02/2021

RESPONSIBLE PERSONS:

Name	Role
Thomas Brown	Head of Security & Campus Safety
Marc Lee	Deputy Head of Security & Campus Safety
Sara Stock	Data Protection Officer

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Any amendments or suggested alterations should be sent to the Head of Security & Campus Safety, University of Essex, Wivenhoe Park, Colchester, Essex, CO3 4SQ. Tel: 01206 872361.

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DEFINITIONS

For the purposes of this Code of Practice, the following definitions will apply:

‘System’ - The University of Essex CCTV comprising of body worn CCTV

‘His / Her Nominee’ - This can be the Deputy Head of Security & Campus Safety, Duty Head of Security & Campus Safety or his / her nominee (Colchester), Security Co-Ordinator (Southend & Loughton), Security Supervisors or Data Protection Officer.

‘Security Officer’ – This covers all positions and roles within the Security & Campus Safety Services

SECTION 1 – INTRODUCTION

This document sets out the University of Essex Security & Campus Safety Services policy for the use of body worn cameras by security officers. The cameras record moving images and audio. It will enable our officers to comply with relevant legislation relation to video recording and outline the benefits to patrol officers, students, visitors and the general public. It also documents best practice procedures with regards to integrity of data, images and video processing.

Body worn cameras forms part of a security officer personal safety equipment and is provided for health and safety purposes. It will be used in an overt manner and will be clearly displayed with the correct identification. Prior to commencement of any recording, officers will give a clear verbal instruction that a recording is taking place.

University of Essex Security & Campus Safety Services is committed to maximising its effectiveness in tackling and reducing crime and disorder, anti-social behaviour and maintaining a safe, secure environment for staff, students and members of the public whilst on University property.

SECTION 2 – AIMS

The introduction of Body Worn CCTV is to carry out the below key aims and though under the CCTV code of practice:

- Reduce crime and disorder and the fear of crime and disorder;
- Reduce anti-social behaviour and capture evidence;
- Provide a safe and secure environment at University;
- Increase the safety of security staff;
- Increase reassurance of members of the Public;
- Reduce potential escalation of incidents;
- Crowd Event Management

- Resolve complaints about security incidents and disciplinary procedures, internally; and prosecutions, externally, more quickly.
- Aims and Objectives from the University CCTV Code of Practice

SECTION 3 – LEGISLATION

When Body Worn CCTV are being used then careful consideration will be given to the use of camera and it will comply with 'fair processing' of recorded information within the terms of the General Data Protection Regulation 2018 (GDPR). The University is compliant with the Data Protection and General Data Protection Regulation, however the University Security and Safety Services will also consider all wider legislation and guidance below.

3.1 LEGISLATION BEING CONSIDERED BY THE POLICY

All video data recorded will be considered in accordance with the following legislation:

- General Data Protection Regulation 2018 (GDPR)
- Human Rights Act (HRA) 1998
- Freedom of Information Act (FOI) 2000
- The Protection of Freedom Act (POFA) 2012 - Home Office Surveillance Camera Code of Practice pursuant to section 30 (1) (a) of FOPA 2012.
- Information Commissioner Office (ICO) Code of Practice for Surveillance Cameras & Personal Information 2014.
- Surveillance Camera Code of Practice

3.2 GENERAL DATA PROTECTION REGULATION 2018

The Information Commissioner's Office is the regulator for the Act and has given guidance regarding the use of Body Worn CCTV equipment. This legislation regulates the processing of 'personal data' or 'sensitive personal data' whether processed on computer, CCTV, still camera or any other media. Any recorded image that is aimed at or may identify a particular person is described as 'personal data' and covered by this Act and will include images and audio captured using Body Worn equipment. The use of Body Worn CCTV in this guidance is 'overt use' meaning that equipment is not to be worn or used in a hidden or covert manner.

Where an individual ask to view footage this is called a 'Subject Access Request'. The requester is only allowed to see footage of themselves and anyone who has provided consent for their images to be viewed by them. This can be done by contacting the University Security or Data Protection Officer in writing. (Data Protection Officer, University of Essex, Wivenhoe Park, Colchester CO4 3SQ or dpo@essex.ac.uk)

3.3 HUMAN RIGHTS ACT 1998

Article 6 provides for the right to a fair trial. All images captured through the use of a Body Worn CCTV device have the potential to be used in court proceedings and must be safeguarded by an audit trail in the same way as any other evidence.

Article 8 of the Human Rights Act 1998 concerns the right for private and family life, home and correspondence. Recordings of persons in a public place are only public for those present at the time and can still be regarded as potentially private. Any recorded conversation between members of the public should always be considered private and users of Body Worn CCTV should not record beyond what is necessary when recording a confrontational situation.

The University will ensure that the use of Body Worn CCTV is emphasised by Security Officers wearing it in a prominent position (normally on their chest) and that it's forward facing display is visible to anyone being recorded. Additionally, Security Officers will make a verbal announcement, where practicable, prior to commencement of any recording.

SECTION 4 – GENERAL GUIDANCE AND OPERATIONAL PRACTICES

4.1 TRAINING

All Security Officers will receive training in the use of Body Worn CCTV. This will include all practical use of the equipment, guidance and best practices. It will also include when to commence and cease recording and the law around the use of CCTV.

All Security Officers will also receive their own copy of the policy and supporting documents relating to the use of Body Worn CCTV. These will be for officers to confirm their receipt, reading and understanding of these documents before the use of equipment.

4.2 OPERATIONAL USE

4.2.1 The operational use of the Body Worn CCTV will be used when necessary in support of the aims outlined above. Body Worn CCTV will also be used operationally by frontline security and it must be used in a justifiable and proportionate with the issue at hand.

4.2.2 Our Body Worn CCTV will only be used in the event where Security Officers find themselves in a confrontational situation where they are subject to or feel that they are likely to be subject to, verbal or physical abuse. They will also be used for the purpose of evidence and safety for Security Officers on routine and vulnerable jobs if required.

4.2.3 Recording will not start until the Security Officers has issued a verbal warning, where possible, of their intention to use the Body Worn Device. Where the situation has escalated beyond the opportunity to issue these warning the information around site will be used that CCTV is in operation. Recording will not normally be made whilst performing normal patrol duties around the University, however, lone workers are allowed to use this as part of their role if required.

4.2.4 The Head of Security & Campus Safety or his/her nominee before the Body Worn CCTV are issued out for use will ensure where possible that the cameras are fully charged and

cleared of all previous footage and any footage required for evidential purposes has been correctly bookmarked and that all incident reports are completed..

4.2.5 Security and Safety Service management will monitor the use of Body Worn CCTV to ensure the equipment is an appropriate tool and that its use is in line with this Policy and procedures.

4.2.6 May also be used during an event where operators feel may be a benefit to an escalating situation such as crowd management and crowd dynamics are in effect during events that take place on campus.

SECTION 5 – RECORDING OF DATA

5.1 University Security and Safety Service have a Body Worn Camera evidence management system and log. This system will ensure compliance of all relevant legislation and provide a full audit trail maintaining evidential continuity.

5.2 Body Camera recording must be incident specific, and Security Officers must not indiscriminately record the entire duties or patrols and must only use the CCTV system to record what Security Officers believes they may be subject to physical or verbal abuse or for the purpose of evidence gathering for an incident or for crime prevention and in line with the aims set out in this document or for a crowd management dynamic event issues for later review.

5.2.1 Security Officers should at the commencement of any recording make a verbal announcement to indicate why recording has been activated and where possible this should include the date, time, location and officers name, together with confirmation that the incident is being recorded using video and audio where possible or time allows.

The purpose of the verbal warning is to allow the subject a chance to modify any unacceptable confrontational or threatening behaviour. If at any time during the incident the officer considers that the use of the Body Worn Camera or the verbal warning is likely to inflame the situation, the Security Officers may use discretion to disengage from further discussion and refer to the onsite Security CCTV policy for the purpose of recording. The verbal wording for officers to use is “I am wearing a body camera and I am now recording video and audio”.

5.2.2 Security Officers once completed recording should then complete a security incident form with the relevant details of the incident and this should be put on to the recording system. Upon returning of the camera the incident logs attached to any recording should match the recording of the Body Worn video files at the end of the patrol should any formal requests be made over the incident that took place.

5.3 Body Worn CCTV footage that is archived will not routinely be viewed for misdemeanours or unlawful acts committed by users, but if a complaint is received, interrogation of the system if appropriate will be used in line of any form of enquiry and may be instigated.

5.3.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 31 days from the date of recording. Images will be automatically overwritten after this point.

5.3.2 Where an image is required to be held in excess of the retention period referred to in 5.3.1, the University Head of Security & Campus Safety or his / her nominee, Data Protection Officer or their nominated deputy, will be responsible for authorising such a request.

5.3.3 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.

5.4 All requests for reviews may only be actioned on the authority of the University Head of Security & Campus Safety or his / her nominee or nominee as per the CCTV Code of Practice Policy. These actions will need to be recorded within the audit trail for the CCTV system and viewing of data imaging as per the CCTV Code of Practice.

SECTION 6 – POLICY AND PROCEDURE REVIEW

6.1 The Policy and documents are subject to review in the light of any legal or procedural changes to ensure that the Body Worn CCTV are appropriate to the Security and Safety department aims of use. Additionally, there will be an annual review to ensure that updates to the policies take place as required as well as staff training and inductions to the process of the Body Worn CCTV.

6.2 The risk assessment around the use of CCTV and Body Worn CCTV will be reviewed bi-annually to ensure that there are no changes to the use or requirements.

SECTION 7 – OTHER RELATED DOCUMENTS

- CCTV Policy and Code of Practice
- Security Standard Operation Procedures
- University Data Protection Policy

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