

West Suffolk Council Body Worn Video (BWV) Code of Practice

This Code of Practice applies to any BWV device operated by West Suffolk Council and covers all units being deployed at any one time by officers of West Suffolk Council.

BWV CCTV surveillance allows for the control, monitoring and recording of images for the protection of staff/assets and the potential prevention of crime and disorder.

All BWV cameras will be used to capture images and audio of identifiable individuals or information relating to individuals which are relevant to the purposes for which the scheme has been established.

In 2022 a new Surveillance Camera Code of Practice was published by the Home Office; this aims to create a more transparent, proportionate and accountable CCTV system.

To assist organisations in achieving the aims set out by the camera code of practice the Home Office also published a Code of Practice - Steps to complying with the 12 principles. If followed correctly, these principles will protect the public as well as uphold civil liberties.

West Suffolk Council works to comply with these practices and have conducted a privacy impact assessment to outline precisely what our system entails and what it is being used for. This is to allow transparency, proportionality and accountability as outlined in the Surveillance Camera Code of Practice.

To access the privacy impact assessment in relation to BWV please visit our [CCTV webpage](#)

1. Ownership of system

The system is owned and managed by West Suffolk Council and was implemented to assist officers in their day-to-day activities.

2. The purpose of BWV

When CCTV systems are initially designed, each camera should have an operational requirement that specifies the purpose of that camera and the response that is expected from the operators. This information can be found within the councils Privacy Impact Assessment.

The purpose of a CCTV system is documented in both the CCTV Code of Practice and the General Data Protection Regulation.

3. Scheme objectives

- For the protection of West Suffolk Council employees / Council Assets
- For the protection and reassurance of safety to members of the public
- To deter/prevent hostile situations

4. Location and access

BWV cameras are to be kept in a secure location when not in use. Once any evidence is captured on the device, they will automatically upload footage to a secure server via 4G connection. Footage can only be accessed by licenced SIA and NPPV2 Vetted operators upon request, by either the police or by council management regarding a dispute (for example an incident or enforcement action) or for audit purposes.

The CCTV control room is situated in West Suffolk House, Bury St Edmunds and has its own separate access, which is protected by both access control and a camera to identify persons before entry is permitted.

Visitors will be strictly limited. Only authorised persons with the express permission of the manager will be allowed entry. A police officer will be allowed access when authority has been provided. Visitors' logs will record all visitors and operators entering or leaving the control room with records kept outlining the reasoning for entry.

5. Deployment and use of cameras

Provision will be made to avoid unwarranted intrusion of the privacy by the camera. BWV is to only be activated when it is believed a hostile situation may occur. All activations must be logged by the user and reported to the local supervisor.

Random checks will be undertaken by the CCTV Manager to ensure that this code of practice is adhered to. Any breaches or misuse of the devices will be logged in a report and flagged with the data protection team and parking services management to investigate it further.

6. Incidents

Users may require activating their BWV devices for the following reasons -

1. An event, or hostile clash.
2. An incident causing alarm or distress to staff or public

7. Training and support

Training in the use of BWV is the responsibility of the parking services management team. Prior to use, officers will need to undergo training in the use of the equipment including when it is appropriate to switch the camera on, what to inform the member of public when using the camera and rights of the member of public in accessing their data. This will also be noted in training records for all new officers as part of their onboarding with the council, and thereafter, as part of annual training for all officers using the system.

Requests for viewing. The police may request access to footage if an offence has taken place and will only be viewed in the following circumstances:

- To assist in the event of a major incident or an emergency.
- To assist in the detection of crime.
- To assist in the arrest and gathering of evidence so that offenders may be prosecuted in relation to criminal or public order incidents.

If footage is required for an internal investigation, then a Data Request Form must be completed and signed off by management and the data protection officer to ensure there is a clear legitimate reason for accessing the footage.

All requests for reviews and footage will be recorded to provide an audit trail, using the CCTV Request Form. If footage is released the following will be adhered to:

- Imagery should go to a nominated officer or manager only, and they should be reminded that they become responsible for the safekeeping of the imagery
- Imagery must not be saved in multiple locations. On receipt of the imagery, officers should assess if the imagery is going to be helpful as evidence to support an investigation or enforcement action. If the imagery is of no help, then it should be deleted straight away (GDPR principle of minimisation – information should be kept for no longer than necessary). If the imagery is to be retained, then it should be classified as Digital Evidence and secured in one location as per the council's guidance – Guidance for Digital Evidence
- Once secured, processes should be put in place to ensure the information is erased in line with the council's retention schedules

Public requests. Any requests for BWV imagery from members of the public should be sent the Information Governance Team in the first instance.

Some examples of when BWV should or shouldn't be activated are listed below:

Activated	Not activated
Persistent verbal abuse whilst an officer tries to talk to an individual during their duties	When an officer is carrying out their duties without any form of duress
Threatening and intimidating behaviour towards an officer or member of the public	In sensitive areas, such as private dwellings, schools, care homes etc. This will require the officer to provide more evidence to support its use in this situation.
When assisting in the prevention or detection of crime	To prove an officer has visited a certain location

8. Complaints

Any complaints received regarding the use of CCTV operated by West Suffolk Council will be dealt with in a timely fashion. Complaints can be made by calling 01284 763233 and asking to speak to a member of staff or by logging it on the West Suffolk Council website.

9. Contacts

Senior Responsible Officer (SRO) – Mark Walsh – Mark.Walsh@westsuffolk.gov.uk
Senior Point of Contact (SPOC) – Luke Porter - Luke.Porter@westsuffolk.gov.uk