

DPA CoP 02: Body worn camera.

Introduction

- 1 The Community Safety and Security Team (CSS) are committed to keeping our community safe. This is achieved through using appropriate and proportionate measures to reduce crime and disorder, tackle anti-social behaviour, and maintain a safe, secure environment for our staff, students, and members of the public whilst on university property.
 - 1.1 In support of this objective Body Worn Camera (BWC) technology has been introduced for use by our staff for operational purposes. BWC allows for exact recordings to be made of an event in an unbiased format both visually and audibly. BWC will be always worn by CSS staff when operationally deployed.
 - 1.2 The devices will only record video and audio footage when manually activated by the user. This will instigate a recording from 30 seconds before the activation and this will continue until the device is deactivated.

Aims

- 2.1 The introduction of BWC is to:
 - reduce crime and disorder.
 - reduce anti-social behaviour.
 - provide a safe and secure environment.
 - reduce potential escalation of incidents.
 - augment opportunities for evidence capture.
 - help resolve disputes quickly and transparently providing evidence to protect against allegations arising from misunderstandings or false accusations.

Principles

- 3.1 In line with regulatory and business needs, the use of BWC will be used in line with the following defined principles.
 - BWC will only be used when operationally necessary in support of the aims outlined above (see Aims).
 - data will be processed and managed in line with relevant legislation and Imperial's policies and procedures.
 - BWC will only be used overtly.

- operational use of BWC must be proportionate, legitimate and necessary.
- the use of BWC will be for specific types of incidents.
- staff may be required to explain when BWC has not been used.

3.2 To maintain good practice, the CSS Team will use BWC as advised by the Information Commissioners Office (ICO) Code of Practice for Surveillance Cameras & Personal Information 2014 which requires;

- any use of BWC should be considered alongside prevailing interaction and impact on Imperial staff, students or members of the public that may be present.
- the CSS Team has a BWC evidence management system - this system will ensure compliance of all relevant legislation and provide a full audit trail maintaining evidential continuity. All data will be downloaded, store and shared in line with GDPR legislation and in line with codes of practice.
- staff will use the equipment in line with this policy document and standard operating procedures. They will receive full instruction in its use and the relevant legislation.
- all staff will use the equipment in line with a risk assessment.
- all CSS staff will have full training from an identified administrator or lead before using BWC. These staff will receive their own copy of this policy document and SOP.
- the CSS Team will comply with this policy document and SOP when gathering evidence or information, ensuring the quality and integrity of that evidence or information.
- BWC archived footage will not routinely be viewed for misdemeanours or unlawful acts committed by users, but if a complaint is received, and an investigation of the system is an appropriate line of enquiry this may be instigated.
- all requests for reviews may only be actioned on the authority of the Head/Deputy of CSS or the Security Service Manager in their absence and in urgent situations.
- a risk assessment will be produced to give guidance on the use of BWC and associated equipment. This must be used in conjunction with other generic risk assessments and all colleagues will use the equipment in line with published risk assessments.
- the Security Service Managers and Team Leaders will monitor the use of BWC to ensure the equipment is an appropriate tool and that its use is in line with this Policy and procedures.

Roles and responsibilities

4.1 The Head of Community Safety and Security (CSS):

4.2 The Head of CSS is responsible for auditing this CoP and related Policy to maintain compliance with the principles laid out above and all associated legal compliance, including:

- UK General Data Protection Regulations.

- Data Protection Act 2018.
- Freedom of Information Act 2000
- The Protection of Freedom Act (POFA) 2012 - including Home Office Surveillance Camera Code of Practice pursuant to Section 30 (1)(a) of FOIA 2000.
- Human Rights Act 1998; and
- The European Convention for Human Rights.

4.3 The Head of CSS has responsibility to ensure all CSS staff have received the required training in the operational use of BWC.

4.4 Community Safety and Security Officers

4.5 No officer will be deployed with a BWC until they have undertaken the necessary training and displayed a competence in its use. Training will include not only the practical use but also operational guidance on when recording should be started and ceased and the linked legal obligations and restrictions.

4.6 BWC will be issued to individual officers at the start of their shift. The officer will ensure the device is recording both visually and audibly and is fully charged.

4.7 CSS staff will wear the BWC overtly.

4.8 BWC will not be activated during normal patrol or other standard security activities.

4.9 BWC will not be used by Imperial to monitor the performance of staff.

4.10 On attendance to an incident where BWC is required to be activated, all staff with BWC will activate their devices to capture as much footage as possible.

4.11 BWC must be activated by staff where an incident involves any use of force or restraint, without exception.

When body worn cameras are used

5.1 BWC are always filming but not recording audio of footage. CSS Officers will start recording audio and video filming when they:

- are notified to respond to an incident or,
- come across a developing incident while on patrol.
- based on concerns for safety based on a dynamic risk assessment.

5.2 BWC automatically record the previous 30 seconds of footage when they are activated. CSS staff will continue to record until the incident is over.

About the camera

6.1 BWC are worn routinely by uniformed CSS staff and will form part of their standard personal protective equipment (PPE).

Recording

- 7.1 The system requires a user to activate the device to 'record mode'. Anyone involved will be notified by the CSS staff when recording is turned on.
- 7.2 The officer will make a clear, verbal announcement to those present to say the equipment is activated where this is practical:
- when cameras are activated, they automatically record the previous 30 seconds of footage.
 - CSS staff will continue to record until the incident is over.
 - recordings will provide precise evidence that will help us to resolve complaints fairly.

What happens to recordings and privacy?

- 8.1 Recordings are held securely on the BWC providers secure and encrypted cloud service.
- 8.2 Footage can only be accessed by named authorised individuals.
- 8.3 Recordings will be automatically deleted after 30 days unless they are saved where there is an evidential requirement or legal request.
- 8.4 No recordings are left on any camera after they are downloaded at the end of each shift.
- 8.5 The use of BWC is in line with UK GDPR and Imperial's CCTV codes or practice for information Security.

Announcing BWC use

- 9.1 BWC is an overt video and audio recording tool and warning stickers have been applied to the devices to highlight this. Users must not remove the stickers under any circumstances.
- 9.2 At the commencement of any recording the user must, where safe and practicable to do so, make a verbal announcement to indicate why the recording has been activated. This must include:
- date, time and location.
 - confirmation, where practicable, to those present, that the incident is now being recorded using both video and audio.
- 9.3 If the recording has commenced prior to arrival at the scene of an incident the user will, as soon as is practicable, announce to those persons present at the incident that recording is taking place and that actions and sounds are being recorded. Steps 1-2 above must also be covered.
- 9.4 Users must make the announcement using straightforward language that can be easily understood by those present e.g. "I am wearing and using a Body Worn Camera".

Accessibility

- 10.1 Team Leaders and Control Room Operators will be trained in and be responsible for the downloading and storage of BWC data to the secure network.

- 10.2 Team Leaders and Control Room Operators will receive full training and support in relation to camera software and the downloading of data.
- 10.3 Team Leaders and Control Room Operators will receive full training in relation to legislative compliance.
- 10.4 Where an officer has saved data on a BWC they will inform their Team Leader and Control Room as soon as reasonably practicable.
- 10.5 Requests for stored data will be managed through the Deputy Head of Community Safety and Security in line with relevant legislation and policy.

Requests to not be filmed

- 11.1 CSS staff are trained in situations where it may be appropriate for them to turn off their camera. This may be due to a number of reasons including;
- staff / students want to tell officers something they do not want recorded or,
 - where staff / students are witness to an incident and do not want to be identified by the perpetrators of a crime.
- 11.2 If someone does not consent to being video recorded the BWC the user may also consider the option to divert the camera away from them or obscuring the lens and then recording the encounter using the audio only facility.
- 11.3 In circumstances where the individual is not the focus of the incident then consent of the individual must be obtained prior to audio only recording.

Complaints / Requests

- 12.1 Anyone who is filmed can make a complaint about being filmed. Make your complaint through the normal university complaint procedures such as, via a Senior Faculty tutor, Student Support services or via the online facility of Report and Support / <https://www.imperial.ac.uk/equality/resources/report-and-support>.
- 12.2 Any recorded image that is aimed at, or may identify a particular person, is described as 'personal data' and covered by data protection legislation. This includes images and audio captured using body worn equipment.
- 12.3 Any person captured can ask to view an image / video held of them through a 'Subject Access Request'.

Staff requests to view footage

- 13.1 Staff requests to view CCTV, as part of their job function, should be made to the Data Protection Office via data-protection@imperial.ac.uk. This may be for example, in relation to a disciplinary or misconduct investigation. When you make the request, provide information about why the request is being made and how it might assist the investigation.

Audit trail and retention

- 14.1 The use of BWC must meet public expectations regarding confidentiality and comply with the Data Protection Act 2018 and UK GDPR. Information must therefore be handled so as to preserve the integrity of core business whilst maintaining availability for operational purposes, stored in line with the full requirements of relevant data protection legislation and only retained for as long as necessary.
- 14.2 BWC recordings will be retained in accordance with the Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR) and the university retention schedule.

Security and loss of BWC and software

- 15.1 Loss of a BWC camera could lead to a breach of security and must be reported immediately to a supervisor and Data Protection Office as soon as a loss is discovered in line with the university Data Breach Plan / <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/new-library-may-24/Data-Breach-Plan.pdf>.
- 15.2 If a BWC camera is found to be missing / lost it is also a requirement of the holder to report the loss to ICT.
- 15.3 A BWC camera can be remotely disabled via Evidence.com if lost or stolen. The systems administrator can complete this task in line with Imperial's existing protocols.

Faulty, damaged or lost guidance

- 16.1 Users must take all reasonable measures to ensure their pool issued BWC equipment is not damaged. Where BWC cameras are lost or damaged beyond economical repair, users will be asked to provide an account of the circumstances before a replacement terminal is issued.
- 16.2 All users are asked to ensure that where they see physical damage to the camera e.g., a cracked lens on the camera / broken case they report the faulty equipment to the Deputy Head of Community Safety and Security for action immediately.

Release of footage to third parties

- 17.1 Where it is felt beneficial or legally required for BWC video to be released to third parties, such as to the police should an incident be investigated for possible criminality, this will be considered on a case by case and in line with university protocols for such disclosures.

Document Control

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Contact for queries:	Head of Community Safety and Security
Cross References:	<p>Data Protection Policy / https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/information-governance/Data-Protection-Policy.docx</p> <p>Information Security Policy / https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/college-governance/charters-statutes-ordinances-regulations/policies-regulations-codes-of-practice/information-systems-security/Information-Security-Policy-v7.0.pdf</p> <p>Information Governance Policy Framework / https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/information-governance/Information-Governance-Policy-Framework---to-be-reviewed.pdf</p>
Notes and latest changes:	<p>November 2024 V1.0</p> <ul style="list-style-type: none"> - Working draft created <p>May 2025 V1.1</p> <ul style="list-style-type: none"> - Combined separate Policy and CoP into a single CoP - Working draft created and reviews undertaken by; <ul style="list-style-type: none"> o Head of the Community Safety and Security Team o Deputy Head of the Community Safety and Security Team o Data Protection Officer. - Converted to new Imperial style in line with branding update. <p>November 2025 1.2</p> <ul style="list-style-type: none"> - Removed hidden URLs to improve accessibility.