

Public Consultation :

Use of Body Worn CCTV by Environmental / Planning / Animal Health / Trading Standards / Licensing & Civil Enforcement Officers.

Background

Why are the Cameras being used?

The purpose of using body worn cameras (BWC) is to:-

- serve as a deterrent to acts of aggression or verbal and physical abuse
- introduce a more imposing recording system to address high levels of anti-social behaviour
- keep people safe
- help to protect officers at work (for Health and Safety purposes)
- capture images close up, including audio recording
- allow the officer to maintain the use of his / her hands and enforcement equipment whilst recording an incident
- provide evidence to support internal investigations (complaints), the issuing of a fixed penalty notices or prosecution cases
- assist in the investigation of allegations of inappropriate conduct by officers

Who will be using the cameras?

The technology will be used by the Council's Enforcement Team's, these will include Environmental Enforcement Officers who tackle a range of problems including abandoned vehicles, dog fouling, fly posting and graffiti, fly tipping, litter, and other waste related offences. It will also be used by the Council's Civil Enforcement Team whose officers who deal with parking enforcement, Trading standards & licencing Officers and Planning Enforcement who will deal with Planning offences.

Environmental Enforcement / Planning / Animal Health / Trading standards /Licencing and Civil Enforcement Officers have received training in the use of body-worn cameras including:-

- practical use of equipment
- on-street operational guidance i.e. when to commence and cease recording
- legal implications of using such equipment.

The cameras are not being used by enforcement officers from other Council departments (eg environmental health/ Neighbourhood Services) at this stage.

When will they be activated?

Cameras will be used in an overt manner. Before recording, officers will give a clear verbal instruction that recording is about to take place (unless in an emergency situation).

Environmental Enforcement / Planning / Animal Health / Trading standards /Licencing and Civil Enforcement Officers will activate the camera when they:-

- have an engagement with a member of the public which, in the opinion of the officer, is confrontational and where they believe that they may be subject to physical or verbal abuse.
- encounter a situation in which they are approached by a member of the public in a manner perceived as aggressive or threatening
- observe an offence occurring (except parking contraventions).

Possible measures to reduce Impact on Privacy

The Council has started to consider measures which could be put in place to mitigate any effect on individuals and their privacy. These are set below. It should be emphasised that the purpose of presenting these measures in this consultation is to assist and inform the public as part of the consultation exercise – a decision on the measure to be implemented will only be taken when the responses to the consultation have been considered and the Privacy Impact Assessment concluded.

Possible measures include

- All recordings are encrypted so that there can be no unauthorised access to any data recorded.
- All recordings will be securely held in accordance with agreed data protection procedures. Recordings would be deleted after 30 days unless retention is required as part of an internal or police investigation.
- Access to recordings will be restricted to authorised personnel.
- The authority will publish strict and clear guidelines relating to who can view any recorded footage and how these requests must be made.

Public Consultation:

The Information Commissioner's office (ICO) has issued a "Data Protection Code of Practice for Surveillance Cameras and Personal Information", and the Home Office has issued a "Surveillance Camera Code of Practice". Both of these Codes recommend that a Privacy Impact Statement is carried out to ensure that the use of the cameras takes into account the effect on individuals and their privacy.

The council is therefore carrying out a formal consultation exercise to seek the views on the use of Body Worn Cameras by our enforcement officers, so that they can be taken into account as part of the preparation of our Privacy Impact Statement.

The consultation is now open and runs to Friday 11th October 2019.