

Body Cam Policy

Body Worn Video (BWV) Policy

Version: 1.0

Approved By: Managing Director

Review Date: Annually

Applies To: All Security Officers and Managers

1. Introduction

Body Worn Video (BWV) technology is a body-worn portable system that provides an audio and visual record of security duties undertaken by the wearer. Sound and images are recorded on a secure, tamper-proof storage device.

The purpose of this document is to bring together all the elements required for the effective, lawful, proportionate and transparent use of Body Worn Video technology, in accordance with:

- UK GDPR
- Data Protection Act 2018
- Human Rights Act 1998
- Protection of Freedoms Act 2012
- Information Commissioner's Office (ICO) Surveillance Camera Code of Practice

This policy enables security officers of [Company Name] to comply with all relevant legislation surrounding body-worn video recording.

This policy prescribes the use of BWV for the purpose of private security guarding operations only and sets out clear guidance for staff and the general public. BWV must never be used for covert surveillance or informal monitoring.

A Data Protection Impact Assessment (DPIA) shall be completed before deployment and reviewed annually or following any operational change.

1.1 Lone Worker

The use of BWV as prescribed in this document is in line with the Company's Lone Working Policy and the Health and Safety at Work etc. Act 1974. Security officers are frequently classified as lone workers and regularly find themselves in situations where there may be a risk of physical or verbal abuse, confrontation, or criminal behaviour.

The Company has a legal duty of care to take all reasonably practicable steps to reduce this risk. A clear and transparent method of reducing and recording such risk is through the use of BWV. It has been proven that where a member of the public is aware that they are being recorded, and that the footage may be used in court or disciplinary proceedings, the likelihood of threatening behaviour is significantly reduced.

BWV shall only be activated where necessary and proportionate to protect the officer or others.

Body Cam Policy

1.2 Incident Recording Process

As it is often unknown when and where a member of the public may display threatening or abusive behaviour, it is essential that BWV is used in a way that maximises the likelihood of capturing such incidents lawfully.

BWV must be activated:

- Prior to confronting a person
- During any dispute or enforcement of site rules
- Where aggression, threats or criminal behaviour is suspected
- When refusing entry, removing persons, or dealing with trespassers

BWV footage will be used as supplementary evidence only. The main body of evidence remains:

- Incident reports
- Pocket notebook entries
- Witness statements
- Photographic evidence

The absence of BWV footage does not invalidate an incident report or enforcement action.

BWV facilitates the capture of good-quality evidence of conversations and interactions with the public and supports fairness, transparency, accountability and lawful complaint handling.

1.3 Static Guarding & Patrol Operations

When security officers commence their assigned guarding shift, including static guarding, mobile patrols or reception-based security, BWV will be available for use throughout the duty period but must only be activated when required.

Static guarding environments often involve:

- Managing public access
- Enforcing client rules
- De-escalating disputes
- Managing intoxicated or aggressive persons

These duties regularly result in verbal interactions, some of which may become hostile or inappropriate.

BWV supports professional conduct and evidence-based decision-making.

Continuous recording is not permitted unless justified by a heightened risk scenario.

1.4 Access Control & Search Procedures

The use of BWV is essential during access control procedures including:

- Bag searches
- ID verification
- Vehicle access control
- Refusal of entry
- Ejection of unauthorised persons

Body Cam Policy

Any subsequent conversations, disputes, or enforcement actions may be used as evidential material in legal proceedings. These situations inherently involve increased risk and BWV reduces this risk while protecting both officers and members of the public.

Officers must not record unnecessary personal or private conversations not relevant to operational activity.

1.5 Heightened Activity, Crowds & Queues

If a security officer is working during heightened risk situations such as:

- Large crowds
- Night-time economy operations
- Public demonstrations
- Emergency evacuations
- High-profile venues

The officer is permitted to use BWV in continuous recording mode where there is reasonable belief that their safety may be compromised.

BWV may also be activated where an incident has just occurred such as:

- Assaults
- Serious disorder
- Theft
- Criminal damage

Footage may be shared lawfully with emergency services in accordance with data-protection law.

1.6 Support the Emergency Services & Counter-Terrorism

The Company supports the role of emergency services in public protection and counter-terrorism activities. Where officers are instructed by police or other emergency services to activate BWV in support of an investigation, the device must be activated, provided this does not place the officer at risk.

All footage remains subject to lawful data handling procedures and must only be shared using approved secure methods.

1.7 Personal Safety & Zero Tolerance

Personal safety remains paramount at all times. Under no circumstances should an officer place themselves in danger for the purpose of recording footage.

The Company operates a zero tolerance policy against:

- Verbal abuse
- Threatening behaviour
- Assault
- Hate crime
- Discriminatory conduct

Body Cam Policy

All such incidents will be reported to the police with a view to prosecution. BWV provides vital evidence to support criminal proceedings and internal investigations.

1.8 Training for Security Officers

BWV footage may be used for training and performance monitoring where lawful and proportionate.

By reviewing recorded footage of incidents, supervisors can:

- Improve communication standards
- Identify training needs
- Promote best practice
- Improve conflict-management skills

All officers must receive formal BWV and data-protection training before deployment and refresher training annually.

1.9 Reviewing Footage

Footage captured by officers may be reviewed by:

- Compliance Team
- Operations Managers
- Investigating Officers
- HR for disciplinary matters

Footage must only be reviewed in a secure, private environment with audit logging.

Footage may be used for:

- Complaint investigations
- Incident reviews
- Legal proceedings
- Police investigations

All access is logged and auditable.

1.10 Data Security

Strict procedures apply to ensure the integrity, security, storage, and controlled access of BWV footage.

All footage is:

- Encrypted
- Access-restricted
- Watermarked
- Audit-logged

Unauthorised access, copying, sharing or deletion constitutes gross misconduct.

2. Legislation Summary

All BWV data shall be processed in accordance with all applicable UK legislation.

Body Cam Policy

2.1 UK GDPR & Data Protection Act 2018

All personal data captured through BWV is processed in full compliance with UK GDPR and the Data Protection Act 2018.

Any recorded image or audio capable of identifying a person constitutes personal data.

2.2 Fair Processing

All processing must be:

- Lawful
- Fair
- Transparent

The Company shall clearly state the lawful basis, purpose and use of BWV footage via:

- Officer verbal notification
 - Visible signage
 - Public privacy notices
-

2.3 Lawful Basis

BWV footage is processed under:

- Article 6(1)(c) – Legal obligation
- Article 6(1)(d) – Vital interests
- Article 6(1)(f) – Legitimate interests

A Legitimate Interest Assessment (LIA) shall be maintained where applicable.

2.4 Purposes

BWV footage may be used for:

- Crime prevention
- Officer protection
- Investigation of incidents
- Legal proceedings
- Complaint resolution
- Training and auditing

Footage must never be used for personal or informal monitoring purposes.

2.5 Transparency

BWV use is overt at all times. Officers must:

- Wear visible BWV signage
- Provide verbal notification where practical
- Respond lawfully to any objections

Body Cam Policy

2.6 Records Retention

Footage will be retained for no longer than necessary:

- Standard retention: 31–90 days
- Legal cases: Until final conclusion

Automatic deletion applies after expiry unless legally required.

2.7 Security

All footage is encrypted, access-controlled, and subject to audit logging. A Data Protection Impact Assessment (DPIA) is mandatory.

2.8 Freedom of Information Act 2000

BWV footage is normally exempt under personal-data protections. Subject Access Requests (SARs) will be processed under GDPR.

2.9 Private Security Industry Act 2001

BWV supports professionalism, evidential standards and accountability in regulated security activity.

2.10 Human Rights Act 1998

- Article 6 – Right to Fair Trial
- Article 8 – Right to Privacy

Recording must always be necessary, proportionate and justified.

2.11 ICO Surveillance Camera Code of Practice

All BWV operations shall comply fully with the Information Commissioner's Office Surveillance Camera Code of Practice, including:

- Necessity and proportionality
- Purpose limitation
- Data minimisation
- Accountability and audit
- Transparency
- Secure storage
- Controlled access
- Timely deletion
- Staff training
- Public confidence

Approved



Body Cam Policy

Managing Director

A handwritten signature in black ink, appearing to be "M. J. P.", is written over the printed name.

CAPITAL SHIELD SECURITY LTD

This policy is reviewed on 01/01/2026