Body Worn Camera Policy

This policy is intended to provide officers with instructions on when and how to use body-worn cameras (BWCs) in accordance with site specific instructions so door supervisors, response officers and patrol officers may reliably record their contacts with the public in accordance with the law. The company operates a system that regularly evaluates its processes and customer's needs, and has set quantifiable objectives with plans in place to ensure that they are reviewed year on year for improvement.

It is the policy of this Company that door supervisors and officers shall activate the BWC when such use is appropriate to the proper performance of his or her official duties, where the recordings are consistent with this policy and law. This policy does not govern the use of surreptitious recording devices used in undercover operations.

The Company has adopted the use of the body worn cameras to accomplish several objectives. The primary objectives are as follows:

1. the cameras allow for accurate documentation of police-public contacts, arrests, and critical incidents. They also serve to enhance the accuracy of staff reports in court.
2. Audio and video recordings also enhance this company's ability to review potential cause for arrest, officer and suspect interaction, and evidence for investigations and prosecution purposes and to provide additional information for officer training.
3. The camera may also be useful in documenting crime and accident scenes or other events that include the confiscation and documentation of evidence or contraband.

When and how to use the Body worn camera

1. Security Officers/door supervisors shall activate the camera to record all official contacts with members of the public in the performance of official duties. Everyday non official contact with members of the public does not need to be recorded but may be at the discretion of the Officer.
2. The camera shall remain activated until the event is completed in order to ensure the integrity of the recording unless the contact moves into an area restricted by this policy.
3. If an officer/door supervisor fails to activate the BWC, fails to record the entire contact, or interrupts the recording, the officer shall document why a recording was not made, was interrupted, or was terminated.
4. Non-CCTV licensed personnel shall not be allowed to review the recordings at the scene.

Procedures for BWC Use

1. Body worn camera equipment is issued primarily to uniformed personnel as authorised by this company. Officers/door supervisors who are assigned camera equipment must use the equipment unless otherwise authorised by supervisory personnel.
2. Employees shall use only cameras issued by this company. The camera equipment and all data, images, video, and metadata captured, recorded, or otherwise produced by the equipment is the sole property of the company.
3. Camera equipment is the responsibility of individual officers and will be used with reasonable care to ensure proper functioning. Equipment malfunctions shall be brought to the attention of the supervisor as soon as possible so that a replacement unit may be procured.
4. Officers/door supervisors shall inspect and test the Camera prior to each shift in order to verify proper functioning. If a problem is found the officer/door supervisor shall notify their supervisor of any problems, take the unit out of service and use a different Camera.
5. Body worn cameras will be worn on the front of the Officers/door supervisors chest in order to obtain the best possible view for recording. Requests to wear the camera in a different location must be approved by the supervisor.

6. Cameras may be placed in other locations if the Officers/door supervisors feels that the placement will provide a better view on a case-by-case basis. Examples of this would be on the dash of the patrol vehicle or on a shelf to record an interview.
7. Officers/door supervisors shall not edit, alter, erase, duplicate, copy, share, or otherwise distribute in any manner camera recordings without prior authorisation and approval of the data controller at the Company.
8. Officers/door supervisors are encouraged to inform their supervisor of any recordings that may be of value for training purposes.
9. If an officer/door supervisor is suspected of wrongdoing or involved in a serious use of force, the company reserves the right to limit or restrict an officer /door supervisor from viewing the video file.
10. Requests for deletion of portions of the recordings (e.g., in the event of a personal recording) must be submitted in writing and approved by the data controller at the company. All requests and final decisions shall be kept on file.
11. Officers/door supervisors shall note in incident, arrest, and related reports when recordings were made during the incident in question. However, camera recordings are not a replacement for written reports.

Restrictions on using the Body worn camera

Body worn cameras shall be used only in conjunction with official security duties and in accordance with site specific instructions. The camera shall not generally be used to record:
1. Communications with other security personnel without the permission of the supervisor;
2. Encounters with undercover security or confidential informants;
3. When on break or otherwise engaged in personal activities; or
4. In any location where individuals have a reasonable expectation of privacy, such as a restroom or locker room.

Storage

1. All sounds, images, and associated metadata should be securely downloaded periodically and/or no later than the end of each shift if possible. If a camera is not downloaded at the end of Officers/door supervisors shift, the Officer/door supervisor shall notify line management that it was not downloaded so that it if a review of a file is needed, it can be found in a timely matter. Each file shall contain information related to the date, camera identifier, and assigned Officer/door supervisor. At the time of download the Officer/door supervisor will indicate if the file is evidential or non-evidential. A complaint/incident will be noted along with the suspect's last name.
2. All images and sounds recorded by the camera are the exclusive property of this company. Accessing, copying, or releasing all sounds, images, and associated metadata for non-law enforcement purposes is strictly prohibited.
3. All sounds, images, and associated metadata should be securely stored in accordance with the retention laws and no longer than useful for purposes of training or for use in an investigation or prosecution.

Supervisory Responsibilities

1. Supervisory personnel shall ensure that officers/door supervisors equipped with camera devices utilise them in accordance with policy and procedures defined.
2. Supervisors who are suitably licensed with a CCTV Licence, will randomly review camera recordings to ensure that the equipment is operating properly and that officers are using the devices appropriately and in accordance with policy and to identify any areas in which additional training or guidance is required.

Operational Acts

The Company operate under and adhere to the following Acts while using body warn cams (BWC)

Data Protection Act (DPA) of 2018
Freedom of Information Act (FIA) of 2000

Human Rights Act (HRA) of 1998
The Protection of Freedom Act (POFA) of 2012
Surveillance Camera Code of Practice (SCCP)

It is the intention of the Managing Director, that this policy along with all other policies will be reviewed on an annual basis at the management review meeting.

Electronic and hard copies of this policy are available upon request.

Signed Dr Adnan Niazi
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