



SP-UK

SUICIDE PREVENTION UK

Suicide Prevention UK

CCTV and Bodycan Footage Policy

2024

Introduction

This policy outlines the governance for the use of CCTV (Closed Circuit Television) and body-worn cameras (Bodycams) by Suicide Prevention UK.

The deployment of these technologies is a measure to ensure the safety of our staff, volunteers, and service users, as well as to protect our facilities and equipment.

It is our priority to use these surveillance resources responsibly and ethically, adhering strictly to the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Purpose

The purposes for the use of CCTV and Bodycams are:

- To deter and prevent criminal activity or misconduct.
- To ensure the safety and security of staff, volunteers, and service users.
- To assist in the investigation of any actual or suspected criminal activity or misconduct.
- To be used as evidence where necessary and appropriate.

Scope

This policy applies to all areas and members of Suicide Prevention UK where CCTV and Bodycams are used, including offices, outreach locations, and during any activities conducted by the Charity.

The Law on Data Protection

The use of CCTV and Bodycams for surveillance purposes must be in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA).

The UK GDPR sits alongside the DPA. Article 5 of the UK GDPR sets out six key principles relating to the processing of personal data. These principles guide how personal data is used for general processing purposes. Personal data is information that relates to an identified or identifiable individual.

Article 5(1) requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation'); and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')."

Article 6(1) of the UK GDPR and Part 2 of the DPA require there to be a lawful basis in order to process personal data. Art 6(1) lists six lawful purposes for which personal data can be processed, which sit alongside some additional requirements set out in Part 2 of the DPA.

The six lawful purposes are listed below;

- a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Other Relevant Legislation

Human Rights Act 1998: This Act incorporates the European Convention on Human Rights into UK law, particularly Article 8, which provides a right to respect for one's private and family life, home, and correspondence. The use of CCTV and bodycams must not infringe on these rights without a proper and lawful reason.

Freedom of Information Act 2000: This Act provides public access to information held by public authorities, which can include footage from CCTV systems operated by public organisations. There are exemptions related to data protection and privacy.

Responsibilities

The Board of Trustees shall have overall responsibility for the following:

- The implementation and embedding of this policy.
- The overall management of the Suicide Prevention UK CCTV and Bodycam systems.
- Coordinating the distribution of CCTV and Bodycam-related material to relevant authorised parties.
- Ensuring that staff, visitors, users of our service and anyone with whom we engage are aware of our CCTV cameras, Bodycams and this policy.
- Collecting stakeholder feedback and implementing the forthcoming necessary changes.
- Ensuring that systems and procedures are in place with regard to the management of both the devices used to capture images and the images themselves.
- Ensuring compliance with this policy.
- Ensuring that systems and procedures comply with the ICO's Code of Practice, the Data Protection Act, the UK GDPR and any other relevant legislation.

All staff members are responsible for the following:

- Reading and abiding by this policy.
- Escalating queries or complaints relating to this policy to the Board of Trustees and Data Protection Officer.

Policy

Lawful Use

Suicide Prevention UK respects and supports an individual's entitlement to go about their lawful business, which will be a consideration in the operation of any surveillance system.

Although it is recognised that there is inevitably some loss of privacy when surveillance systems are operational, we have assessed their use and have determined that the primary legal justifications for their use may fall under one or more of the following categories (depending on the system used and other specific factors):

Legitimate Interest: We may use CCTV and bodycams as we have a legitimate interest that necessitates surveillance, and the use does not unduly infringe on individuals' privacy rights. Legitimate interests include ensuring the security of our property and people, preventing theft, maintaining safety within premises, and documenting incidents for legal protection or compliance with regulations.

Consent: In situations where it is feasible, we will obtain explicit consent from individuals before capturing footage with bodycams.

Vital Interests: Bodycams may be used lawfully to protect someone's life in emergency situations where there is a high risk of hazardous incidents.

Positioning of the CCTV Cameras

All cameras are located in prominent positions within public and staff view and do not infringe on internal 'private' areas such as bathrooms and places where staff may change their clothing.

Signs are erected on all entrance points to Suicide Prevention UK premises and throughout the site to ensure staff and visitors are aware they are entering an area that is covered by CCTV surveillance equipment.

Signage will:

- Be clearly visible, legible and of an appropriate size.
- Include details of the organisation in control of them.
- Include the contact details for that organisation.

A camera will be depicted on the signage and will include the following wording (or a variation):

- "Security Warning CCTV in Operation"

Bodycam Principles

- Bodycams may be small but are not to be worn or used in a hidden or covert manner.
- The use of bodycams should be clearly advertised, when possible, before commencing recording.
- Bodycams should be used with reasonable discretion (e.g., a member of the public asking general questions would not expect to be recorded).
- Recordings should only be made in situations where the bodycam wearer would previously have made a written record of the encounter.
- Recordings should commence at the start of any deployment to an incident and should continue uninterrupted until the incident has concluded.
- Recordings should not be made of general patrolling duties unless this is part of a specific operation (e.g. where the Police have specifically asked us to record at an event).

Quality of Images and Device Servicing

It is important that the images (and, where appropriate, audio recordings) produced by the equipment are as clear as possible in order that they are effective for the purpose(s) for which they are intended.

All CCTV camera installations and service contracts should be undertaken by approved security companies.

Upon installation or commission and at regular intervals, all equipment is audited to ensure that high-quality pictures (and, where appropriate, high-quality audio recordings) are available in live and playback mode.

All CCTV equipment will be serviced and maintained (or replaced) as required.

All Bodycams will be serviced and upgraded regularly as part of the leasing contract.

All faults with CCTV must be reported as per local fault reporting procedures.

Accessing Data

Access to footage can only be achieved by signing into the password-protected, cloud-based systems.

Access is limited to the Founder and CEO.

Only those with an 'operational need' to view specific incidents may view them.

Sharing Data

Access to and security of the images is controlled in accordance with the requirements of the 1998 Act.

Footage will not be disclosed to third parties except as required by law or where there is a legitimate and lawful reason to do so.

Where the images are required for evidential purposes in legal proceedings, the Founder and CEO will work with the requester to determine the most appropriate way to share the information, ensuring that the data can be shared safely (thus minimising the risk of a data breach).

Where Police request our footage, these are dealt with under sharing protocols in place via the following ICO guidance: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/sharing-personal-data-with-law-enforcement-authorities/>.

Privacy Notices

Individuals whose images are captured by CCTV or Bodycams have the right to:

- Request access to footage in which they appear in accordance with GDPR provisions.
- Challenge the legality of footage capture and processing under data protection laws.

If you have any questions about this policy or wish to invoke your rights under GDPR, please contact us at:

- Email: info@spuk.org.uk
- Phone: 0800 689 5652
- Address: Suicide Prevention UK, Suite 601, 179 Whiteladies Road, Bristol, BS8 2AG.

Please note: Availability of the recordings will be subject to the retention period.

Data Retention

Footage will not be retained for longer than is necessary. Normally, this will be 30 days, except where images are requested for preservation for potential evidential and legitimate investigation purposes.

Whilst footage will automatically be deleted from the cloud storage systems, a record will be made of the destruction/deletion of any non-evidential footage that is downloaded.

Stakeholder Engagement

It is important that our stakeholders have a say in how we act. Therefore, Suicide Prevention UK will:

- Ensure that anyone likely to be affected will be informed of our CCTV or Bodycam system.
- Make a copy of this policy available to anyone likely to be affected.
- Consult with our staff, partners, the people who use our service, their families and other stakeholders affected by our surveillance systems when deciding how to use CCTV and Bodycams to understand their privacy concerns and ensure their views are taken into consideration.

Training

Appropriate training will be provided to all staff involved in operating CCTV and Bodycam equipment to ensure they understand the legal restrictions and ethical considerations involved.

Misuse of Cameras

Any incident or potential misuse of CCTV cameras, Bodycams or systems must immediately be reported to the trustees.

Any staff member found to have violated the terms of this policy may be subject to disciplinary action, up to and including termination of employment and may also be personally liable for violating this policy.

Where appropriate, Suicide Prevention UK will involve the Police or other law enforcement agencies concerning breaches of this policy.

Monitoring and Reviewing

This policy will be reviewed annually or following significant changes to surveillance technology or practices to ensure ongoing compliance with the law and best practices.

Policy Date: November 2020

Review Date: April 2024

Next Review: April 2025

Dated and Signed by the Chair and Founder of Suicide Prevention UK:
