

# **Body Worn Video (BWV) Privacy Notice for Harrow Council**

## **Identity and Contact details:**

Harrow Council collects and processes personal information about you. We are registered as a Data Controller under the Data Protection legislation and our contact details are:

Darren Davies, Civic Centre, Station Road, Harrow, HA1 2XY  
Contact email: [dpo@harrow.gov.uk](mailto:dpo@harrow.gov.uk)

This Privacy Notice explains what information we collect in relation to BWV, the reasons for this and who we may share this information with. The notice also details your rights to access this information.

## **Purpose for processing your information**

A number of our officers' operate BWV cameras; our security team at various locations wear BWV to protect staff, visitors and premises. Kingdom our 3<sup>rd</sup> party enforcement officers and the councils Civil Enforcement Officer wear BWV on the street to reduce incidents of violence and aggression to staff/other people in the vicinity/visitors and to ensure that the best evidence of offences is captured. We process this data to perform our public task in accordance with Article 6(1)e of the GDPR.

## **What categories of personal data do we process?**

In the main we process data to include images and audio recording as well as the potential to collect sensitive (special category) personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual orientation, and criminal offences and convictions to the extent that this data is visible in the images or audio recorded by our BWV cameras.

## **What do we do with this personal data?**

The BWV footage is used to promote the safety of council's officers, to reduce the potential number of confrontational situations experienced by officers, to reduce the potential escalation of incidents and to augment the opportunities for evidence capture. The Council has a responsibility to prevent crime and disorder in and around council buildings. Video footage is taken from the BWV devices and backed up to the council's data storage device.

The council is committed to compliance with the Information Commissioner's Office's data protection code of practice for surveillance cameras and personal data, the Home Office's surveillance camera code of practice and the Surveillance Camera Commissioners Office.

## **Who we share this information with.**

BWV footage may be shared internally with officers who need to review incidents that have occurred. We may also share with law enforcement agencies, prosecution agencies, legal representatives and third parties where it is lawful to do so. Members of the public can request footage under article 15 of the GDPR, please see the process for this in "your rights and access to your information"

## **How do we keep your personal information secure?**

We will do what we can to make sure we hold personal records about you (paper and electronic) in a secure way and we will only make them available to those who have a right to see them.

Examples of our security processes include:

- Encryption - meaning that information is hidden so that it cannot be read without special knowledge (such as a password).
- Pseudonymisation - meaning that we will use a different name so we can hide parts of your personal information from view. This means that someone outside of the Council could work on your information for us without ever knowing it was you.
- Redacting footage including audio, video and or other documentation
- Controlling access to systems and networks allows us to stop people who are not allowed to view your personal information from getting access to it.
- Training our staff to make them aware of how to handle personal information and how and when to report when something goes wrong.
- Regular testing of technology and upgrading security measures including keeping up to date on the latest security updates (commonly called “patches”)

For further information about Harrow Council’s compliance with data protection law, please contact us: [DPO@harrow.gov.uk](mailto:DPO@harrow.gov.uk)

### **How long do we keep your personal information in the form of BWV footage?**

Harrow Council retains BWV footage for 28 days for non-evidential footage. If there has been an incident and we are required to keep the data for a legal obligation we may retain the information for up to 6 years in line with the Criminal Procedures and Investigations Act 1996.

### **Your Rights and Access to your information**

You have the right to request a copy of the information that we hold about you.

The General Data Protection Regulation also gives you additional rights about the information we hold about you and how we use it, including the right to:

- Withdraw consent and the right to object and restrict further processing of your data; however this may affect service delivery to you.
- Request to have your data deleted where there is no compelling reason for its continued processing and provided that there are no legitimate grounds for retaining it.
- Request your data to be rectified if it is inaccurate or incomplete.
- Have your data transferred or copied should you move to another authority.
- Not be subject to automated decision-making including profiling

To request information that we hold about you visit our [Subject Access Request page](#).