

Privacy Notice - Use of Body Worn Video (BWV) Cameras by Revenue & Security Officers on the London Overground Network operated by Arriva Rail London

Why have BWV Cameras been deployed?

Over the last few years, and recently, Arriva Rail London noted a significant increase in the number of incidents of both verbal and physical aggression towards our RSOs. This included verbal intimidation, threats of violence, intimidation and inciting hate against our officers including physical assaults.

ARL has a responsibility for the Health, Safety and Welfare of its staff. RSOs already regularly undertake conflict management training to help equip them with the skills needed to effectively manage confrontational situations.

Body Worn Cameras are now deployed regularly by many train operating companies. We believe that the use of Body Worn Cameras has a significant impact in reducing abuse and aggression.

What steps have Arriva Rail London taken in consideration of the impact on the privacy of the public by using these cameras?

A privacy impact assessment was undertaken to consider the impact upon individuals and their privacy, and to consider measures which could be put in place to mitigate any effect on individuals and their privacy.

ARL has implemented a policy and procedures which mitigate any privacy issues and to ensure the Council's compliance with the Information Commissioner's Office (ICO) "Data Protection code of practice for surveillance cameras and personal information". From November 2021 Arriva Rail London RSOs will be equipped with these recording devices.

When and where will the cameras be used?

The record button on the cameras will only be activated where an RSO finds themselves in a confrontational situation where they are subject to, or feel they are likely to be subject to, verbal or physical abuse.

There is a 'pre-record' function on the cameras which means that when the parking enforcement officers are carrying out their duties, the cameras will be continually background recording on a 'loop', for 30 seconds at a time. This '30 second mini-recording' is then 'recorded-over' by a new recording, and this process continues repeatedly throughout the day.

The most recent incident of 'pre-record' footage is only retained on the device **if** the enforcement officer activates the record button on the device. Then the camera captures and retains that preceding 30 seconds of footage with the recording of the incident.

Unless the record button gets activated, the one minute of pre-record footage is automatically deleted when the camera is turned off.

This 'pre-record' feature should help to establish/clarify what has led to the record function being activated.

Recordings will not be made of general patrolling duties.

The devices will only be used within the London Overground Rail Network.

The devices will record both Audio and Visual. This is to provide a reliable record of what was said in an incident as it may be used as evidence in an internal or external investigation.

How will I know when recording is taking place?

The cameras are worn overtly on the outside of the Officer's uniform, normally on the chest or shoulder, and the visual display on the camera will clearly show when recording is taking place. When the record button is first activated, the camera also emits a flashing light.

Officers should also advise the member of the public where possible that they have commenced recording when they first activate the device.

All officers have Audio/Video warning signs displayed on their uniform jackets.

How will this recorded data be kept secure?

All recordings will be securely held in accordance with agreed data protection procedures. The cameras will encrypt all recordings so that there can be no unauthorised access to any data recorded. Access to recordings will be restricted only to authorised personnel.

How long will these recordings be retained?

Recordings would be deleted after 28 days unless retention is required as part of a subject access request (SAR), or an internal or police investigation, in which case the recording will be retained securely until the investigation or SAR is completed.

Who can access these recordings?

Authorised staff will be able to view the recordings for RSO training and development purposes, to identify areas for improvement when dealing with conflict. Authorised staff will also be able to view the recordings to support an internal ARL investigation.

Statutory Prosecution Agencies such as the police will be able to view the recordings for law enforcement purposes, and recorded data may be released to them for evidential purposes for example to support a prosecution.

Data subjects (the person who has been recorded) can request to view the recording in the Arriva Rail London Headquarters at Swiss Cottage. Requests must be made via a subject access request.

Who do I contact if I have any queries or complaints about use of the body worn video cameras?

For queries, please contact the First Contact Team

They open 24 hours a day, 7 days a week. Call 0343 222 1234 or Webform www.tfl.gov.uk

Or send a letter to:

TfL Customer Service

4th Floor

14 Pier Walk

London SE10 0ES

Or scan the QR Code to access the TfL Website

