



# Blue 9 Security Security Limited

## Business Case for Body Worn Video Cameras

---

### Section 1: Scope

#### Introduction

Blue 9 Security holds the contract for Buildings Security Services with the London Borough of Barnet (LBB), to hold keys, respond to alarm activations and to check void property. In addition Blue 9 deploys officers to monitor void property and land owned by LBB to prevent trespass and to monitor any LBB property which is being trespassed upon.

During it's tenure Blue 9 has recorded a steady increase in the incidence of violence and abuse being directed towards the company's officers. Malicious allegations are sometimes made against the officers requiring investigation. Reports are regularly submitted to the council detailing these incidents

#### Aims

Blue 9 Security intends to react proactively in the interests of protecting its front-line staff and the reputation of its clients.

Blue 9 Security wishes to deploy officers equipped with Body Worn Video Cameras (BWV) to help deter criminal behavior, and to record it when it occurs for the information of clients, the Police and eventual prosecution. This will protect the reputation of LBB and Blue 9 Security. BWV are already being used to good effect by LBB's parking enforcement contractor.

## Section 2: Video Capture and Data Processing

### **How BWV Footage Will Be Captured**

Officers will activate BWV when they believe an incident is occurring or when an incident has occurred and footage must be recorded for evidential purposes. The data will be securely managed by Blue 9 Security in accordance with Data Protection Law and access will be given upon an official request from a legitimate body.

### **The Benefits and Necessity of the use of the BWV**

Blue 9 has a duty to provide a safe working environment for its staff and must comply with the Health and Safety Act 1974. Research proves that BWV does reduce criminal behavior. The Police have recorded a large reduction in assaults on officers and malicious allegations. People are less likely to be violent or abusive if they know they are being both video and audio recorded.

### **Evidence Gathering**

BWV will provide a record of any interactions between officers and any person(s) which might lead to a breach of the law. This can be used as prosecution or defence evidence. This will improve and enhance the accuracy and reliability of evidence which is likely to lead to more successful prosecutions and fewer cases being pursued unnecessarily. This will also improve efficiency of the legal processes and should reduce the time and expense of legal actions.

### **Increase the integrity of security service.**

As the interactions between the Security Officers and the individuals are recorded, this will help ensure that all Officers are adhering to the correct protocols. The footage will assist in the provision of a professional service and should raise service standards whilst acting as a preventative measure to troublesome or aggressive members of the public.

### **Reduce Complaints**

BWV recordings will provide an accurate contemporaneous recording of the interactions which will enable both the Council and Blue 9 to effectively investigate and address complaints regarding the conduct of the Security Officers more effectively. As there will be a recording of any problematic interactions, both the Council and the prosecution will be able to review the recording and make a judgement on the footage, as opposed to relying on witness evidence. The response to complaints will be faster and any element of doubt will be removed. This will become known amongst the fraternity who are known to attempt to gain some advantage while making a claim by alleging that they have been treated badly.

## **Increased accountability and transparency**

BWV will improve the accountability of Blue 9's officers providing service for the council by making their actions transparent

## **Section 4: Assessing necessity and proportionality**

### **Information provided to individuals and supporting individuals' rights**

At any point whilst Blue 9 Security is in possession of or processing personal data, all subjects (i.e. the individual to whom the personal information relates) have the following rights:

- Right of access – subjects have the right to request all of the information held about them
- Right of rectification- subjects have the right to correct data that Blue 9 hold about them if it is inaccurate or incomplete
- Right to be forgotten – in certain circumstances, subjects can ask for the data held about them to be erased from the records
- Right to restriction of processing – where certain conditions apply the subject has a right to restrict the processing
- Right to portability – subjects have the right to receive personal data they have provided to Blue 9 Security, in a structured, commonly used readable format (and the right to request that a controller transmits this data directly to another controller)
- Right to object – the subject has the right to object to certain types of processing
- Right to object to automating processing, including profiling – the subject has the right not to be subject to the legal effects of automated processing or profiling

Individuals on whom personal data is held can request, from the Blue 9 Security Data Protection Officer the following information:

- Identity and contact details of the person or organisation Blue 9 has and the reasoning behind how and why the data has been processed.
- Contact details of the data protection officer, where applicable
- The purpose for the processing as well as the legal basis for processing
- If the processing is based on the legitimate interest of Blue 9 or a third party such as one of its clients
- The categories of personal data collected, stored and processed
- Recipient(s) or categories of recipients that the data is/will be disclosed to
- How long the data will be stored
- Details of the subject's rights to correct, erase, restrict or object to such processing
- Information about the person's right to withdraw consent at any time
- How to lodge a complaint with the supervisory authority (data protection regulator)
- Whether the provision of personal data is a statutory or contractual requirement as well as whether the subject is obliged to provide personal data and the possible consequences of failing to provide such data

- The source of personal data which was not collected directly from the subject
- Any details and information of automated decision making, such as profiling and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing

Individuals can make requests (relating to the above rights and information held on them) from the data protection officer@blue9security.co.uk This contact email address will be available on the Blue Security website and on the LBB website.

**Safeguard any international transfers of information**

The personal data will be held on a UK based server.

| <b>Section 7: Identifying and Assessing Risk</b>   |                           |                         |                     |
|--|---------------------------|-------------------------|---------------------|
| <b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.                    | <b>Likelihood of harm</b> | <b>Severity of harm</b> | <b>Overall risk</b> |
| Loss, unauthorised access to, destruction or damage, unlawful processing of the Personally Identifiable Information held on BWV                                  | Remote                    | Significant             | Low                 |
| Loss, unauthorised access to, destruction or damage, or unlawful processing of Personally Identifiable Information held on the encoded back-up system within B9S | Remote                    | Significant             | Low                 |
| The Security Officers may retain the personal data that they collect for their own personal use  | Remote                    | Severe                  | Medium              |
| Blue 9 does not comply with the agreed contractual arrangements including the Data Protection Agreement.   | Remote                    | Significant             | Low                 |

|   |          |             |        |
|---|----------|-------------|--------|
| <b>(Body Worn Videos)</b> The data collected by the Body Worn Videos could either be lost or misused.   | Remote   | Significant | Low    |
| <b>(Body Worn Videos)</b> The use of the Body Worn Videos could result in footage being recorded unnecessarily.   | Moderate | Low         | Low    |
| <b>(Body Worn Videos)</b> The recorded images are undertaken in private areas as opposed to public areas.   | Moderate | Low         | Low    |
| <b>(Body Worn Videos)</b> The Body Worn Videos could be used for covert surveillance or the Officers could conduct covert surveillance with or without use of the BWV). | Remote   | Severe      | Medium |
| <b>(Body Worn Videos)</b> The recordings could capture the movements and actions of other persons (i.e. bystanders) when the equipment is being used.                   | Moderate | Low         | Medium |

## Section 8: Identifying Measures to Reduce Risk

| Risk   | Options to Reduce or Eliminate Risk   | Effect on Risk | Residual Risk | Measure Approved |
|--|---|----------------|---------------|------------------|
| Loss, unauthorised access to, destruction or damage, unlawful processing of the Personally Identifiable Information held on Blue 9 back office system (Transmach)                    | <ul style="list-style-type: none"> <li>• B9s has limited and secure access via the cloud with a duo authorisation.</li> <li>• BWV has limited and secure access via the cloud with secure and restricted access</li> <li>• Main storage is Cloud based compliant with GDPR requirements</li> <li>• All B9S employees receive additional Data Protection training and awareness which includes both I.T. and site security and confidentiality in line with GDPR regulations.</li> <li>• Training and awareness to be regularly updated and reissued.</li> <li>• Physical security on site will be regularly checked by the B9S Operations Manager and audited by the Quality and Compliance Manager.</li> </ul> | Reduced        | Low           | Yes              |
| Loss, unauthorised access to, destruction or damage, or unlawful processing of Personally Identifiable Information held on Blue 9 systems (electronic handheld devices used by EEOs) | <ul style="list-style-type: none"> <li>• All BWV's are encrypted</li> <li>• All B9S employees receive additional Data Protection training and awareness which includes both I.T. and site security and confidentiality in line with GDPR regulations.</li> <li>• Training and awareness to be regularly updated and reissued.</li> </ul>  | Reduced        | Low           | Yes              |

|  |   |         |     |     |
|--|---|---------|-----|-----|
|  |   |         |     |     |
| Individuals and businesses issued with a Fixed Penalty Notice may not be made aware of what the intentions are for the use of the personal data they provide | <ul style="list-style-type: none"> <li>• Full privacy notice regarding the use, processing, retention of data is publicly available at <a href="http://www.blue9security.co.uk">www.blue9security.co.uk</a></li> <li>• The link to this privacy notice will be provided on the relevant page of the LBB website.</li> </ul>   | Reduced | Low | Yes |
| The Security Officers may retain the personal data that they collect for their own personal use  | <ul style="list-style-type: none"> <li>• SOs are required to return BWV's to the Team Leader at the end of every shift and are not permitted to take any company equipment home.</li> <li>• SOs have no access to the footage on the BWV.</li> <li>• Electronic record of system access is in place and will be audited by B9S</li> <li>• All B9S employees receive additional Data Protection training and awareness which includes both I.T. and site security and confidentiality in line with GDPR regulations<sup>1</sup></li> </ul> | Reduced | Low | Yes |

---

<sup>1</sup> Training records are maintained and kept by KSG and will be available for review and monitoring at the regular contact review meetings

|  |  |         |     |     |
|--|--|---------|-----|-----|
| Blue 9 does not comply with the agreed contractual arrangements including the Data Protection Agreement        | <ul style="list-style-type: none"> <li>• Monthly update meetings will be held with the contract manager to monitor and ensure compliance and address any issues or risks which arise.</li> <li>• There will be a designated individual from the client side who can be contacted should any issues arise.</li> </ul> | Reduced | Low | Yes |
| <b>(Body Worn Videos)</b> The data collected by the Body Worn Videos could either be lost or misused.          | <p>SOs have no access to the footage on the bodycam.</p> <ul style="list-style-type: none"> <li>• BWV devices are encrypted</li> <li>• Restricted access to data only to approved individuals, all access recorded for audit</li> </ul>  | Reduced | Low | Yes |
| <b>(Body Worn Videos)</b> The use of the Body Worn Videos could result in footage being recorded unnecessarily | <ul style="list-style-type: none"> <li>• Procedures in place governing what is to be recorded and not recorded. The system will be set up to retain data for the correct retention period (as in Blue 9 policy – see Privacy Notice <a href="http://www.blue9security.co.uk">www.blue9security.co.uk</a>)</li> </ul> | Reduced | Low | Yes |
| <b>(Body Worn Videos)</b> The recorded images are undertaken in private areas as opposed to public areas.      | <ul style="list-style-type: none"> <li>• All B9S employees receive additional Data Protection training which includes clear guidance about the designations of public and private areas and the use of BWV in such areas</li> </ul>  | Reduced | Low | Yes |



|   |   |         |     |     |
|---|---|---------|-----|-----|
| <p><b>(Body Worn Videos)</b> The Body Worn Videos could be used for covert surveillance (or the SOs could conduct covert surveillance with or without use of the BWV)</p> | <ul style="list-style-type: none"> <li>• BWV will only be deployed in an overt manner. Clear guidance will be provided to SOs.</li> <li>• It is understood that covert/directed surveillance can only be carried out in accordance with the Council's RIPA policy. Furthermore, UNDER NO circumstances will Blue 9 Security carry out any covert or directed surveillance.</li> <li>• That NO covert or directed surveillance is to take place has been made clear to all B9S SOs through the training they have received.</li> </ul> | Reduced | Low | Yes |
| <p><b>Body Worn Videos)</b> The recordings could capture the movements and actions of other persons (i.e. by-standers) when the equipment is being used.</p>              | <ul style="list-style-type: none"> <li>• SOs are trained to ensure that wherever possible, the focus of their activity is on the person with whom they are interacting.</li> <li>• In circumstances where individuals are captured in any video or audio information and they are unrelated to any offence under investigation, their identities will be protected and anonymised especially should the matter be presented to Court.</li> </ul>  | Reduced | Low | Yes |