



BODY WORN VIDEO PRIVACY NOTICE

This Privacy Notice covers the use of Body Worn Video (BWV) by The Rochester Bridge Trust (the Trust). The Trust is the owner of the BWV and the 'data controller' for the images produced.

For more information, please contact the Data Protection Manager: pippa.parfitt@rbt.org.uk.

What processing activities are undertaken that include my personal information?

We equip our Bridge Team with BWV devices for use on, and around, our land and bridges. The use of the BWV described in this notice is intended for "overt use" only and as such, it will not be used in a hidden or covert manner. The BWV does not record constantly but will record on demand to capture an incident or potential incident as determined by the Bridge Team using it.

Why is my personal data being processed?

Our land and bridges are managed to promote the charity objectives and enable efficient operation of the Trust. Some of our land is used for parking and access and this is managed through regular patrols by the Bridge Team, which may result in enforcement notices being issued, or vehicle owners being directly engaged with. Occasionally patrols for bridge works are undertaken where it may not be possible for the usual procedures for safe working to be followed.

The use of BWV will ensure a safe and secure environment for the Bridge Team and allow the capture of any incident of abuse; injury or violence; which may then be shared with the Police.

What categories of personal data are processed?

The processing may capture static and moving images of individuals; audio recordings; and vehicle registration information. The Trust does not deliberately set out to capture special category data as part of this processing, but BWV may incidentally capture information which would be classified as such.

What is your lawful basis for processing my personal data in this way?

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. The Trust has a legitimate interest in processing your personal data in this way in order to:

- Protect the safety and security of its workforce, contractors and members of the public using our land and bridges;
- Protect our land and bridges;
- Minimise unlawful disruption to our operations and the promotion of our charitable objectives;
- Collect evidence of harassment or abuse against our employees;
- Detect and protect crimes or criminal activity.

Access to data

Your information may be shared internally, including with staff with responsibility for responding to incidents.

Your information may also be shared with the Police; and other third-party organisations e.g. insurance companies, in the event of a traffic incident or accident involving parked cars.

How is my data protected?

Security of your data is taken seriously to avoid accidental destruction, misuse or disclosure. All BWV is encrypted via a software key which is assigned to a specific device. It cannot be downloaded or read by any other system.

How long is data retained?

If BWV is required for evidential use, it is primarily stored on the encryption key but will not be retained by the Trust for longer than 12 months. Any footage that is not required for the escalation of an incident will be destroyed immediately.

Your rights

As a data subject, you have rights under the UK GDPR, which this notice and our BWV Policy have been designed to uphold. You have the right to be informed about and have access to any personal data held about you; to have it rectified if it is incorrect; and to ask to have it deleted. If you make a request, we must respond to you without undue delay and in any event within one month. To make a data protection rights request, please contact the Data Protection Manager using the contact details at the top of this privacy notice.

If you believe that the Trust has breached your data protection rights, you can make a complaint to the Information Commissioner.