

Report regarding Dashcam

You will recall that following vandalism to the Parish Council van, Councillors expressed an interest in obtaining a dashcam.

Councillor Butland provided a dashcam that he no longer wanted which I have had an opportunity to look at. Unfortunately, I cannot get it to work and as it does not come with instructions or even with a model or reference number, I cannot locate guidance online and I have been unable to do anything with it.

As I also advised as the dashcam will be used by a public authority there are a number of compliance requirements set out by the Information Commissioner's Office (ICO). I also spoke to the ICO helpline and clarity was provided as to the legal compliance.

The legal compliance and paperwork element is quite burdensome so I wanted to bring some information to your attention so you can decide on whether using a dashcam is the most effective course of action and make some decisions on how much you may wish to spend should you decide to go ahead.

Needs of the Parish Council

The ICO advised that the Parish Council needs to have a clear statement on the lawful basis of the use of the data so there needs to be precise clarity on what is required.

The advice was as follows –

1. To carry out a privacy impact assessment
2. To consider the legal process for collecting the data. Public interest and crime prevention would seem to be the main reasons but this needs to be clearly stated in writing.
3. Look to update the existing privacy statement and it will then need to be circulated to everyone with whom the Parish Council deals with
4. So far as the employees are concerned, they will need to be consulted and there will need to be an explanation as to how they will be recorded and their private information utilised
5. So far as any other person is concerned there would need to be a notice on the windscreen of the van to make it quite clear that they will be recorded and how to access their data and access the privacy statement
6. To be clear on how the device works and what information will be gathered. It is usual not to record sound but that will need to be clear.
7. To be clear on how the device records the data – is it on an SD card or does it go to the cloud – if so, is that in the UK or overseas as that will impact upon legal requirements.
8. It may be a good idea to get input from the Police as if they would not accept the images of a particular model of dashcam then there is little point obtaining the data. They would probably need date stamped and clear images. This will impact upon the model used.
9. Whether advice is required before a dashcam is purchased and installed.

10. To be clear when the device would be on and employees should have a clear understanding of how it works and when it should be on or off.
11. Does the device write over itself and how the data is stored as members of the public have a right to request their data so there would need to be access to the device to comply with subject access requests. Does it need to be manually wiped? There would need to be clarity on when the information will be deleted.
12. It was suggested that CCTV regulations be checked to ensure compliance as there is a code of practice on recording data from the general public

On 25th August I had a chat with the local community Police officer. He explained that CCTV images can be used by the Police but need to be of high quality. He advised that the extra eyes scheme with the Safety partnership allows such data to be uploaded and he thinks it is a useful tool to consider. He is checking on current codes of conduct and will send me the latest information.

He also advised that any model needs to have a motion sensor so that if it is stationary and someone tries to tamper with the van it will activate. He confirmed that the van will need a notice stating that it has a dashcam but that may be useful in having a deterrent effect. Therefore, any dashcam to be purchased needs to be of more than basic quality.

I have ascertained that Halfords in Braintree are able to offer advice on models available and their various features and having taken a look it would appear that to meet the requirements suggested by the Police officer the costs are likely to be in the region of £200 to £300

Please consider at the next meeting what you would like to do in this regard

Suzanne Walker

25/8/22