

RDG Guidance Note: Body Worn Video Use

RDG-OPS-BWV

Issue 1



About this document

Explanatory Note

The Rail Delivery Group is not a regulatory body and compliance with Guidance Notes or Approved Codes of Practice is not mandatory; they reflect good practice and are advisory only. Users are recommended to evaluate the guidance against their own arrangements in a structured and systematic way, noting that parts of the guidance may not be appropriate to their operations. It is recommended that this process of evaluation and any subsequent decision to adopt (or not adopt) elements of the guidance should be documented. Compliance with any or all of the contents herein, is entirely at an organisation's own discretion.

Other Guidance Notes or Approved Codes of Practice are available on the [Rail Delivery Group \(RDG\) website](#).

Issue Record

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This document is reviewed on a regular 2-year cycle.

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1 Purpose and Background

1.1 Purpose

This document provides national guidance on policy, practice, compliance and technical specifications about deploying and implementing Body Worn Video (BWV) as a tool to prevent violence against their staff. It is intended as an overview of generic requirements and should be supplemented by operator and local requirements to ensure alignment with specific operational and technical demands.

1.2 Background

A joint Rail Delivery Group (RDG) and British Transport Police (BTP) two-year project was initiated in August 2021 and is focused on encouraging greater use of BWV across the rail industry, to support staff, passengers, and public safety. Many operators have been using BWV for several years, with others more recently rolling out the use of BWV.

The focus of BWV in this context is as a deterrent for potential violence and to provide evidence to aid prosecution against those who assault staff. Research undertaken by Cambridge University in conjunction with RDG, BTP and Northern Rail in 2019¹ using trial data, found that assaults on staff were cut by nearly half for those wearing BWV.

It is important to note BWV isn't considered a replacement for staff training in how to defuse escalating situations by using appropriate human interaction approaches and is viewed as a complementary tool.

This guidance document has been developed by a working group made up of members from several TOCs, Rail Delivery Group and Transport for London. Consultation [will be] undertaken with the British Transport Police, unions (RMT, TSSA), cross industry working groups including the Work-related Violence Strategic Group, People on Trains and at Stations Risk Group, the Passenger & Operations Safety Group and the Policing & Security Committee.

2 What is Body Worn Video

2.1 Overview

BWV is a wearable device that can record video and audio interactions between people. There are typically two different types of BWV used – one is recording constantly and the other is manually activated. The devices can be worn on uniforms or on lanyards, acting as a deterrent against work-related violence and aggression, and provides assurance for staff and the travelling public by making them feel safe. It also provides valuable evidence to investigate and take action against offenders; potentially speeding up criminal justice system processes and facilitating swifter justice for victims.

¹ <https://journals.sagepub.com/doi/full/10.1177/0734016818814889>

3 Principles of Use

3.1 Principles Overview

These high-level principles provide guidance to help ensure that BWV is adopted in line with best practice and consistently across TOCs within the rail industry. These principles do not specify how specific aspects of BWV use should be assessed and controlled, that is a matter for the individual TOC to determine and manage. Nor do they replace any regulatory requirements placed on TOCs with regards to their responsibilities for the management of GDPR requirements, health and safety or safeguarding.

3.2 Operational roles in scope for use

It is recommended that all customer facing roles where there is close interaction with the public are in scope for BWV use. Identification of specific roles for use of BWV is determined by individual TOC priorities, risk assessments and requirements.

It is recommended that further consideration/assessment for inclusion of the following roles is also undertaken:

- Any role which requires lone working
- Roles which involve crime prevention or detention
- Roles which involve safeguarding

3.3 Compliance of use

Compliance and enforcement of BWV use by staff is made by each individual TOC. There are currently a range of compliance categories being employed across different TOCs. It is recommended that in assessing compliance approach, the following points be taken into consideration:

Type of use	Points to consider
Mandatory	<ul style="list-style-type: none">• Could be applied for higher risk roles e.g., where data has shown there is a higher risk of the role being subject to assault/abuse such as rail enforcement officers• Could be applied in areas (e.g., specific stations or areas of a station, specific train routes and/or routes times/days where the data has shown the risk of a staff member being assaulted/abused is high(er)
Recommended	<ul style="list-style-type: none">• Could be applied in roles where a degree of confrontation is likely and interaction with passengers is commonplace.
Voluntary	<ul style="list-style-type: none">• Could be applied to all other customer facing roles that don't fall in to into the above categories, depending on BWV availability

The compliance approach adopted by each TOC will also be informed by other factors such as:

- Current and planned availability of BWV equipment
- Discussions and any agreements made with recognised trade unions at a local level
- Risk assessments including crime statistics analysis
- Staff perceptions around and willingness to wear BWV

It is the decision of each TOC what BWV compliance approach to take, including using a hybrid approach (i.e., some roles may be mandatory while others are recommended or voluntary).

It is recommended that the following guidance points be adopted by BWV users as best practice and are covered in training (see section 3.9):

Points	Guidance
1.	Users should, where possible/practicable, announce to the subject(s) of an encounter that video and audio recording is taking place using BWV
2.	The camera should be visible to the customer / passenger
3.	Recordings should commence at the start or as soon as you believe the incident requires recording and should continue uninterrupted until the incident is concluded.
4.	Recordings should not be made of general duties.
5.	Recordings should not be made of conversations between members of the public, staff, or any other individuals unless it meets one of the acceptable reasons for activation, and where you believe a reliable record is needed of what was said and / or done.
6.	If the functionality is available, users should activate the pre-record function
7.	Users should where practical, transfer any footage as soon as possible from their camera
8.	To do this, as a minimum, users should complete an Incident Reporting Form, to ensure the data is retained for future use by TOC or the Police
9.	BWV users should respect everybody's right to privacy and ensure they are not recorded without appropriate justification

3.4 Acceptable reasons for activation

The primary purpose of BWV is to diffuse situations, prevent physical and verbal aggression against staff, and capture Video and Audio images that may be used by TOCs or the British Transport Police (BTP) for the purposes of investigating and taking action against offenders.

Other incidents witnessed that could warrant activation of the camera, are outlined in the table below:

Type of Use	Description	Types of incidents that could be captured and submitted
Workplace Violence & Aggression	<p>If a BWV wearer feels they or a colleague are at risk of work-related violence and aggression or concerned that an incident/interaction may escalate if it is safe and practical to do so.</p> <p>This includes incidents of verbal abuse or threat, physical assault and Hate Crime.</p> <p>There may be situations where the wearer entering into a potentially challenging situation (e.g. asking a person to stop smoking on a platform or if feeling vulnerable when approaching large intimidating groups</p>	<p>Verbal abuse Physical abuse Hate Crime Antisocial Behaviour</p>
Crime Prevention and Detection	<p>If a BWV wearer is witness to a suspected crime where the police will be called, or the incident will be reported to the police by the member of staff or a customer (if it is safe and practical to do so).</p>	<p>Violence Robbery Theft Drugs related offences Criminal damage Sexual offences Antisocial Behaviour</p>
Safeguarding	<p>If a BWV wearer is dealing with the immediate safety of a vulnerable customer, a member of the public or staff if they think they pose a risk to themselves or others if it is safe and practical to do so.</p>	<p>Dealing with/supporting children Dealing with/supporting vulnerable adult Dealing with/supporting intoxicated person</p>
Safety related incidents	<p>If a BWV wearer needs to monitor operational and safety related incidents at stations where evidence needs to be captured.</p>	<p>A person on a track, something damaged before it is made safe, access / egress points for trespass, graffiti</p>
Enforcement activities	<p>Users are required to activate BWV for specified byelaw interaction they have with a customer or member of the public if it is safe and practical to do so.</p>	<p>Reporting someone for prosecution or ejecting someone from the station.</p>

3.5 Storage, Access, and Control of BWV footage

All TOCs that use BWV should have clearly documented and readily available policy on the storage, access and control of BWV footage.

It is recommended the following key elements should be assessed for inclusion in this policy:

Element	Points for assessment
Storage	<ul style="list-style-type: none"> • How and where footage will be stored (e.g., the connection of BWV devices and data download to a single designated computer) • Security aspects e.g., password protection, encryption, restricted access to the single designated computer, review of footage in a secure or private location • Retention and subsequent deletion of footage alignment with information management best practice, including UK GDPR (www.ico.org.uk)
Access	<ul style="list-style-type: none"> • Who will have access to the footage and what criteria is applied to identify an individual / role • Process for requesting access to footage (e.g., access register that captures date, time, person viewing footage, reason for request) • Regular auditing of footage access
Disclosure	<ul style="list-style-type: none"> • Who may request disclosure of recordings and the TOC role responsible for managing the disclosure process. Examples of agencies that may request footage include: <ul style="list-style-type: none"> - law enforcement agencies where images recorded would assist in a specific criminal or civil inquiry. - prosecution agencies - relevant legal representatives - the Office of Rail and Road or Health and Safety Executive, where images recorded would assist in an inquiry into an incident or accident - the Rail Accident Investigation Branch (RAIB) as part of their investigation into an accident or incident - Insurance Companies where necessary to resolve liability issues - people whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal injuries or criminal proceedings) - a request as part of a serious customer complaint investigation. This could be done at the request of Senior Management, appointed Investigating Officer in line with company procedures. or the staff member involved.

Element	Points for assessment
Alignment with Home Office guidance	<ul style="list-style-type: none"> Compliance with the data security measures referred to the Home Office 'Working Technical Guidance for Body Worn Video'. See link for further information: Link to Home Office Technical Guidance for BWV devices
Review and Audit	<ul style="list-style-type: none"> What processes are in place to review BWV systems on a regular basis, to ensure it remains necessary, proportionate and effective in meeting its stated purpose for deployment What audit mechanisms will be in place to ensure legal requirements, policies and standards are complied with in practice, and how this will be reported on

3.6 What BWV footage can be used for

All TOCs that use BWV should have clearly documented and readily available policy on what BWV footage can be used for.

The primary intended use of BWV footage is to support the investigation of a recorded workplace violence & aggression incident by a TOC and/or British Transport Police. In some cases, footage may be used as evidence in court to prosecute an offender.

Reasons for use of footage outside of the above scope, which may differ between TOCs, could include but not limited to:

- An incident safety review
- Staff training post incident
- As part of a serious customer complaint investigation
- Internal disciplinary procedures (if agreed as part of TOC specific internal policy)

The reasons for use of BWV footage should be based on the following five JAPAN principles:

1. Justifiable - is it necessary
2. Appropriate - is this the right course of action
3. Proportionate - is this the right action according to the gravity of the request
4. Authorised - is the person asking in a position to make the request
5. Necessary - is this the correct or only way to do it

3.7 Data Protection, Subject Access and Freedom of Information Requests

All TOCs that use BWV should have clearly documented and readily available policy on Data Protection, Subject Access and Freedom of Information Requests.

BWV is covered by General Data Protection Regulation (GDPR) and its use is governed by legislation.

The Information Commissioner's Office (ICO) states:

‘Because of the volume of personal data and potentially sensitive personal data that BWV cameras will process and the portability of them, it is important that you have appropriately robust technical and physical security in place to protect this information. For example, make sure devices can be encrypted, or where this is not appropriate have other ways of preventing unauthorised access to information’.

- All footage recorded by BWV must also be retained in accordance with BWV Deletion Schedule
- Where possible there should be signage or announcements in workplace/buildings and premises stating that BWV is in use.
- Staff should where practical and safe, announce to the public or customer that they are about to activate BWV
- It is recommended that notices are displayed in prominent locations informing passengers and the public that BWV is in use at the location. Notices should also signpost where passengers and the public can find the company data protection statement. If there is existing signage for CCTV or visual surveillance systems in place this is sufficient to cover the use of BWV. If neither CCTV or other visual surveillance signage is in place specific BWV signage should be used.

3.8 Using BWV for police investigations and criminal justice processes

For TOC prosecutions any BWV evidence submitted in respect of prosecution cases needs to ~~any~~ meet Crown Prosecution Service (CPS) evidential requirements on Exhibits. Video recorded evidence is admissible in evidence in the same way as photographic or audio taped evidence is admissible.

British Transport Police prosecute crimes on the rail network and bring offenders to justice. BWV footage is a valuable source of digital evidence to aid prosecutions. The investigation officer will request BWV footage of an incident via a link to enable the TOC to upload footage digitally to their digital evidence management system. Where TOCs are unable to upload footage, the investigating officer will request discs.

Where video evidence is obtained by the police and produced to the CPS, it is and it remains the responsibility of the police to ensure that the video evidence has been viewed and that any sensitive or personal information in relation to any person shown and/or heard therein is edited. Personal or sensitive information includes, but is not limited to names, addresses, dates of birth and any other material that may identify any person shown therein, such as (in the case of CCTV) vehicle registration details of third part vehicles where that information is not relevant to the investigation.

The police should take steps to pixelate or otherwise disguise and obscure those details prior to providing media evidence to the CPS. Where discs are used and more than one copy of a disc is provided, each copy needs to be checked and edited prior to providing to the CPS.

If the video is destroyed, the court may consider that the loss of the recording requires that the criminal proceedings should be stayed as an abuse of process, but only where the loss is such that it means that the accused will not be able to have a fair trial – [link to CPS Abuse of Process guidance](#)

Video recorded evidence may be used in several ways:

- As the evidence in chief of a young witness, see Children as Victims and Witnesses

- As direct evidence of the events which are captured on the video recording either to set the scene of an incident in general terms or to show what was done by a particular offender.
- As a means of putting a context to the evidence of witnesses in the same way as a plan or photographs of the scene would be used. In this case the video recorded evidence is likely to have been taken after the incident that is the subject of the case.
- To assist with identification of an offender.

[Link to Home Office guidance on Safeguarding Body Worn Video Data](#)

[Link to Home Office Body-Worn Video Technical Guidance](#)

3.9 Training

All staff who are identified as BWV wearers and their line managers, should receive training prior to commencing using BWV equipment

Training at a minimum should include:

- Legislation and its implications
- Understanding the concept and technology
- Practical use of BWV – including how to wear the equipment correctly
- Uploading of evidence
- How to store the devices, when not in use transfer of footage to secure media
- How to process requests for footage by e.g., the police (uploading/disc)

Each TOC should have a training plan in place that reflects the needs of staff (e.g., could be a combination of face-to-face briefings by line managers, short videos, written instructions). It is noted that staff using BWV may often be working in challenging circumstances and may need to develop new skills to cover many scenarios.

It is recommended that staff should be given access to an online tool kit, that may cover other aspects of managing difficult customer behaviour, with BWV included as a complimentary tool.

In addition to the above, it is also recommended that those who will be responsible for the management of the devices/footage receive appropriate training:

It should include:

- Legislation and its implications
- Policies regarding Data Protection, Subject Access, and Freedom of Information Requests
- Overview of how BWVs will be used
- Uploading of evidence
- Transfer of footage to secure media
- How to process requests for footage by e.g., the police (uploading/disc)
- How and when to delete footage

3.10 Periodic Reviews / Evaluation

It is recommended that regular reviews of BWV use should be undertaken, including:

- review of feedback from customers and the public, including complaints data
- staff training records
- operation of TOC policy in place
- review as to whether the purposes for which the adoption of BWV use for a TOC was established still exist
- liaison with relevant trade unions.

It is good practice to review the results of evaluation of schemes with the British Transport Police and the relevant trade unions.

A good practice audit approach would include examination of records, voice and visible recordings, still photographs, recordings histories and the content of recorded media, and will review operation of, and compliance with TOC policy.

4 Supplier Contract Scope and Technical Specification

4.1 Contract scope

BWV contracts should where feasible cover the full scope of the service requirement and not be restricted to hardware and/or software purchase. This should include therefore all elements of kit, mounting, docking, licensing, training and support. A suggested scope for inclusion in the requirement is as follows:

- Body Worn Video Cameras provision meeting the required technical specifications including those outlined in 2.2
- All ancillary equipment required for safe use of all body worn video cameras including (but not limited to) charging leads, mounting options and any specific mounting options outlined in the requirements.
- Docking stations capable of charging cameras and uploading footage from docked cameras through use of the appropriate network access.
- Full Warranties (with clearly outlined pricing for relevant use durations) for ALL equipment supplied including a clearly outlined policy on what is covered by said warranties and how returns/replacements are handled in the event a warranty issue arises.
- Software licences for ALL required users of body worn video to allow footage to be uploaded and transferred to relevant operator and industry evidence management systems as well as allow designated users to have camera management rights in order to asset track and allocate/troubleshoot cameras and their usage withing the contractor's proprietary software.
- Full technical support for the issue of cameras and the installation of static docks throughout the estate. Including provision of technical support personnel (appropriately vetted, proof of which will be required in advance) to assist with and in some case fully install static docks and cameras at operational locations.

- Provision of a clear method statement of how the Contractor plans to implement their solution within the timescales outlined including how they will support the scope of the implementation and overcome any logistical and/or geographical issues
- Confirmation that all equipment specified is available for delivery within specified timeframes and is so and will not be subject to any significant delivery delays or stock issues.
- Full training and support material for the use of any equipment supplied to users to operate the supplied equipment correctly and effectively from first switch on
- Provision of other additional support or assistance as reasonably required at no additional cost to support the successful implementation of the equipment.

4.2 Technical specifications

BWV contracts should cover detailed specifications for standard and specialist BWV cameras including connectivity, storage capacity and safety requirements. Suggestions for standard specifications for use of BWV are outlined below.

Camera design

- Cameras must be clearly identifiable as a body worn video camera incorporating the universal bwv symbol on the public facing side of the camera. This can be achieved with a sticker or other solution and need not necessarily be an integral part of the camera body itself.
- The camera must have a unique and visible serial number
- The camera must utilise a standard mounting or
- The camera must be capable of utilising several mounting options including (but not limited to) a standard 'Klickfast' mounting, lanyard, magnetic and crocodile clip type mounting options
- The camera should be able to be activated whilst the user is wearing gloves
- The battery must be contained within the camera casing and not be able to be removed by the user
- The camera will have both configurable audio and visual alerts to give the user battery life and recording alerts
- The camera should have the ability to be charged via a USB cable (e.g. USB2.0/3/Micro/C)

Specific Functionality

- The camera shall contain an integral microphone capable of capturing undistorted conversational speech at locations ranging from indoors to outside locations such as platforms and roadside etc.
- Camera should have a Wide/High Dynamic Range for Low light and motion blur compensation (moving from light to dark and vice versa). Providing a balanced image in various lighting environments.
- The camera shall provide a minimum of 30 seconds of pre-event recording/buffering when it is put into record mode. Both Video and Audio shall be capable of being recorded in the pre-event recording. Activation of Video pre-record only or both Video and Audio pre-record shall be configurable at organisational discretion

Docking and connectivity

- The cameras must have the ability to upload directly using Wi-Fi/3G/4G and charge via a USB cable (e.g. USB2.0/3/Micro/C) and from networked docking stations
- Static docking stations should have the ability to be configured to control upload speed
- Where required, the camera should have a minimum Bluetooth 4.0 (which must comply with NIST guidance (and NPIRMT where relevant) for capability to allow automatic recording with any current or future compatible 'Triggers' such as, but not limited to; V&A/Crash etc

Performance

- The Camera must record video with a minimum image quality: 720p/30fps
- The camera must have a minimum of 12 hours battery life on continuous stand by and storage capacity to support a minimum of 8 hours continuous recording (at 720p) from a full charge and be capable of a full charge cycle in 6 hours
- Camera must have listed (tested) operational working environmental data such as (but not limited to) safe operating temperatures, extreme weather performance and temperature changes etc

Safety

- Cameras must have a minimum IP44 rating
- Any equipment supplied must conform to and have passed, all relevant safety standards. Proof of which must be provided within the response to this tender and the dates such assurances/certificates etc... were obtained or written confirmation they are still valid
- The camera must be 'safe' to use in a rail network infrastructure capacity and be capable of disabling RF Transmission in case of close proximity to a 'suspect item'.
- The Camera must not cause electromagnetic interference with communication or electrical equipment

4.3 Operational Specifications

BWV contracts should include relevant operational specifications related to management information, standards and personal security where relevant and outlined below:
Management information

- Comprehensive itemised equipment reports by serial number.
- Failure trends, usage and data storage.
- Returns of equipment and replacement of faulty equipment in a simple one for one format with dates, times, serial number(s) and fault diagnosis.
- Compliance with service levels
- Number of complaints received and resolution times.

Standards

- Cyber Essentials Scheme Basic Certificate
- CESG Check Accreditation
- EN ISO 9001 or agreed equivalent; and
- ISO 27001 Information Security Management or agreed equivalent.
- HMG Baseline Personnel Security Standard where relevant.

4.4 Standard Terms and Conditions

BWV contracts should include standard contractual terms and conditions including but not limited to:

- Delivery
- Service levels
- Payment
- Disruption
- Complaints
- Dispute resolution
- Break clause
- Recovery upon termination
- Exclusivity &
- Health & Safety

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