



Your reference:

Our reference: FOI_25_0010

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 09/09/2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_0010

On 04/01/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

Request 1:

1. I would like to see the relevant policy regarding the use of body worn video
2. When this policy came in to effect
3. How many officers are using their body worn video
4. How long body worn video footage is saved for
5. How many reports of body worn video footage are lost or missing?
6. How many deaths within Gloucestershire have been referred to the community safety partnership as a result of domestic abuse since 2011
7. How many deaths have been referred within Gloucestershire to the community safety partnership as a result of any police contact prior to the death since 2011
8. How many Claire's law disclosures applications have been submitted in the last 5 years.
9. How many people requesting a disclosure under Claire's law application have been given disclosure on:
 - a) right to know basis
 - b) need to know basisin the last 5 years
10. Figures broken down year by year please?

Request 2

1. I would like to see the conflict of interests and inappropriate association policy which was implemented in 2017 and any updated versions
2. How many members of staff within Gloucestershire have completed their training module:
 - a) data protection

- b) government security classification module
- 3. How often do staff have to update the above training modules
- 4. What is your current compliance rate in this training within the last 12 months

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary holds some relevant information.

With regards to Request 2, questions 2, it is not possible to electronically identify and retrieve this information;

There are no specific records held in relation to the completion of training courses and although the system used to deliver the training can provide a snapshot report as of the time the information is requested, it does not have the functionality to produce retrospective reports. Any information obtained from the system therefore does not take into account any persons who are absent (i.e. sick or seconded), who have left the organisation or are new to the organisation and have not completed the training as of the date the report is run.

The only way to provide an accurate response to this question would be to manually review individual employee HR-based records to determine when the training was last completed. A manual review would take far longer than the 18 hours prescribed by the Freedom of Information Act.

As a result of the above, we are unable to answer Request 2, question 4.

Section 17(5) of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

In relation to your request Section 12 applies.

Section 12(1)– Fee Regulations states:

Section 1(1) of the Act does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit. (As detailed in the Data Protection and Freedom of Information Fees Regulations of 2004)

The appropriate limit at the moment is £450 calculated at an hourly rate of £25 per hour for all staff time incurred in:

- i. Determining whether information is held
- ii. Locating it
- iii. Retrieving it
- iv. Extracting the information to be disclosed from the other information.

In accordance with the Act, this letter represents a Refusal Notice for this part of your request.

Providing Information Outside of the Act

By way of assistance and although excess cost removes the Force's obligations under the Freedom of Information Act, I have supplied the information relevant to your request which

has already been retrieved. I trust this is helpful but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

Request 1, questions 1,2 & 4 –

Please see the attached document

- Body Worn Video Policy.pdf

Request 1, question 3 –

This information is not recorded however we may be able to provide the number of camera units that have been issued to officers if this would assist you.

Request 1, question 5 –

This is not recorded information.

Request 1, question 6-7:

The number of deaths referred to the CSP since 2011: 35

The number of deaths referred to the CSP where there was police history of DA: 31

Request 1, question 8-10:

Year	Total applications received
2020	507
2021	591
2022	700
2023	908
2024	1,294
2025 – to 31/07/2025	935

Year	Total Right to Know Disclosure	Total Right to Ask Disclosure
2020	94	115
2021	57	96
2022	55	108
2023	106	163
2024	180	270
2025 – to 31/07/2025	81	223

Request 2, question 1:

Please see the attached documents:

- Conflict-of-interest-policy-v1.1
- Notifiable Association Policy V4

Request 2, question 3:

A Managing Information course must be completed every year, however there is no automated process to initiate this and is reliant on the Governance & Compliance department and a Chief Officer mandating it to ensure that the training is completed each year.

The GSC training is reviewed annually. It is then re-published in the form of a policy document, handout and explanation of how the classification is used. It is expected that staff will review the documents to refresh their understanding.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary



Body Worn Video

Policy

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1. Policy Intentions

This policy is a supplementary source of guidance for our organisation where the National Authorised Professional Practise (APP) guidance does not provide the localised detail. This policy should be read or consulted after persons have appraised themselves of the following documents;

- [BWV training guide](#)
- [BWV user guide](#)
- [BWV National guidance](#)

The college of policing have not yet produced a BWV Authorised Professional Practice document. The APP is in development and should be published in 2025. There is a nationally recognised BWV Guidance document that was created in 2023 that is accepted across policing as the current APP. This national guidance document is intended to form the basis of the future National BWV APP. As such Gloucestershire Constabulary have also adopted this National BWV guidance document and for future reference in this policy will refer to that as the BWV APP.

To avoid duplication or alternate working practises that would move away from BWV APP, this BWV policy will directly align itself to all recommendations and working practises in the current guidance.

2. Policy Wording

2.1. Core BWV Principles

- If in doubt record and record early
- If in doubt retain on DEMS360 under a MOPI category **(Make use of below shortcut)**
- If one officer records and retains then all record and retain
- Be prepared to justify “Why you did not record” as opposed to “Why did you record”

Short cut to mark a recording as evidential whilst recording

Officers occasionally fail to mark a recording as evidential after docking a camera.

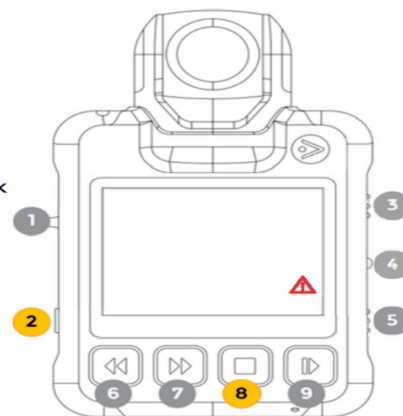
There is a shortcut button on the BWV camera that allows officers to mark a recording to immediately be retained.

While recording, press the button (2) once to mark the file as important.

The symbol  will appear in the bottom right corner of the screen.

Pressing the button again will unmark the video and remove the symbol.

This will retain the recording in MoPI Group 1 category which is 100 years. Please ensure that officers retrospectively open DEMS360 on a desktop to correctly classify and annotate the the recording as soon as possible.



2.2. When to record

The training you will have been provided, training documents, and the APP make it clear when you should record and when not to record. The threshold to record is very low meaning that recording with BWV is likely to be justifiable at all incidents which you attend.

Where users fail to use BWV when required to do so, they will be required to justify their actions to internal/external scrutiny including the criminal justice system. Significant failures to record and retain BWV can be considered as breach of the standards of Professional Behaviour or evidence of Unsatisfactory Performance.

2.2.1. Record

- When you arrive at an incident
- At the first sign that any force will be used against any person or premises.
- Further use of BWV within the custody unit may be considered should officers be required to use force, or where it may be useful for evidential collection procedures such as whilst using the intoxilyser machine.¹
- Every “Person Stop Search” but not intimate searches
Searches exposing intimate parts can be recorded. Officers should cover the camera (or direct it away from the person) whenever intimate body parts are exposed. Audio recording should remain activated
- Every “Vehicle Stop”
- Every “Premises Search” (from entry to exit)- unless the longevity of search prevents recording and then professional judgement will be used to only record evidential points

¹ The CCTV system in the custody unit provides good **video** coverage of most areas of the suite, but the recording of **audio** can be difficult to understand. As such officers should use their BWV in the custody unit in line with the current policy

- Under normal circumstances, all BWV users present at an evidential encounter, regardless of the fact that other BWV users may be present, should record the incident.
- If a member of the public specifically request that any encounter or interaction is recorded, then it should be recorded.
- Any police incident thought to relate to someone's mental health where their vulnerability is at the centre of the incident or where the police have had to do something additionally or differently because of it
- **First accounts** from victims of Domestic Violence and whilst taking details of a VIST
- **First accounts** from victims of recent Rape and Serious Sexual Offences (RASSO). Recent is defined as an offence which is dynamic, ongoing, or within forensic window opportunities (cases that have occurred within 7 days of report). BWV is not required for RASSO offences outside of this definition (Subject to a personal decision by the officer and victim).²
- BWV during prisoner transport. Rationale not to record could be that one officer supervising the prisoner/subject records, so the driver of the police vehicle chooses not to record. Rationale not to record should be recorded on BWV.³

2.2.2. Do not record

- General patrol
- Whilst obtaining a written statement
- Whilst performing road closures
- Whilst on scene guard
- Obtaining accounts from persons involved in a child death
- Material that is protected by legal privilege
- Our Constabulary does not approve/support the use of BWV for formal interviews with suspects under caution

2.2.3. Record with caution or respectfully

- In religious settings
- In hospitals
- BWV users must be aware of the sensitivities when recording persons who are in a state of undress

2.2.4. Objections to recording in any setting

- In principle, users are not required to obtain the expressed consent of any person being filmed even if in a private dwelling when we are present with a legal basis. If any person requests that the BWV be switched off, the user should advise the subject that:
 - any non-evidential material is not retained for any longer than necessary
 - this material is restricted and cannot be disclosed to third parties without the subject's express authority, unless prescribed by law
 - Recorded material can sometimes be police information and can be accessed on request in writing in accordance with a subject access request in accordance with the DPA or evidential disclosure (as appropriate).

It is then for the user to consider on a case-by-case basis whether or not to switch the BWV off.

² It has identified that first-responders using BWV at attendance of non-recent RASSO offences, can have a detrimental effect on the outcome and introduce bias throughout the criminal justice journey.

³ Recent national events and feedback from HM Coroner have identified vulnerability when transporting prisoners/subjects to custody centres or places of safety. Escorting officers should have their BWV activated during this journey as a record of that journey and any incidents that occurred within. Any decision made not to record a journey should be justified on their camera prior to stopping recording.

If the user deems it necessary to turn off their BWV but events subsequently develop that require further investigation or proceedings, they should resume recording.

2.3. Other important instructions

- There are alternate modes of harnessing the device to your body or clothing. So if you are operating in the covert or discrete policing arena and anticipate using force you should take appropriate measures to secure the device in a manner to allow you to record.⁴
- Download and charge your device daily especially when evidence has been recorded
- **All officers** involved in an evidential case (Arrests, use of force, crimes) need to download their videos and mark them as evidence⁵
- You can use your device to record CCTV images with the sole intention of helping with swift prisoner processing. This recording should be saved in DEM360 but this BWV can never be used as evidence in court so it is critical that at some point the original CCTV/evidence is seized
- Where possible take time to explain to the public; **Why** you record, **What** you are recording, and **How** it is saved and can be accessed if required
- Making a commentary while filming- Some evidential information may take place out of view or hearing of the camera or microphone. It may prove helpful for the user to provide a verbal description detailing evidence not present in the video (e.g., distinctive smells such as cannabis) to assist the viewer
- Concluding or suspending a recording- Where practicable, users should make an announcement that the recording is about to finish and provide a rationale why
- BWV may be used to capture a first accounts, and witnesses maybe permitted to review their account prior to making and signing any written statement
- BWV cameras should not be powered on within 15m of a Suspect Package and **MUST NOT** be used to record any suspect device in situ.

2.4. Retention periods

All BWV footage must be uploaded onto Reveal DEMS360 as applicable prior to an officer going off duty. This will ensure that the footage and evidential continuity is secure

Any footage is automatically uploaded to the DEMS account of the BWV user when the camera is docked in the docking station.

Once a recording has completed, the recorded data becomes police information and is subject to the rules in the APP – [Information Management and MOPI](#).

Users have a responsibility to correctly assess all footage that may fall into the below categories as soon as possible, and before 30 days of recording. This will ensure that evidence is not lost, policy is not breached, and the legitimacy of police actions can be justified.

Where users fail correctly retain BWV, they will be required to justify their actions to internal/external scrutiny including the criminal justice system. Significant failures to retain BWV can be considered as breach of the standards of Professional Behaviour or evidence of Unsatisfactory Performance.

⁴ This does not apply to firearms resources who will adhere to firearms APP

⁵ All material recorded could form unused material (particularly if more than one officer is filming). There is a need to comply with CPIA, in particular to; record, retain, review and reveal disclosable information to the prosecutor

Grouping	Guidance Note
MoPI Group 1 – 100 year(s) 0 Day(s)	Serious Crime Multi-agency public protection arrangements (MAPPA) managed offenders. Offences specified in the Sentencing Act 2020 Schedule 18 which carry a maximum sentence of 10 years or more. Potentially dangerous people.
MoPI Group 2 – 10 year(s) 0 Day(s)	Sexual offences listed in Schedule 3 of the Sexual Offences Act 2003. Violent offences specified in the Home Office counting rules for recorded crime and the National Crime Recording Standard. This group also includes offences specified in Schedule 18 of the Sentencing Act 2020 which are not Group 1 offences, i.e., carry a maximum sentence of less than 10 years. Other serious offences are recorded as such on the PNLD
MoPI Group 3 – 7 year(s) 0 Day(s)	All other offences
PSD – 6 year(s) 0 Day(s)	For use by PSD
ICT Test – 1 year(s) 0 Day(s)	For use by ICT
Summary Road Traffic Offences - 2 year(s) 0 Day(s)	Summary only traffic offences
Possible Complaint – 6 Month(s) 0 Day(s)	If any persons feels that a complaint may arise
Non crimeable- UoF/Stop Search/Vehicle Stops – 6 Month(s) 0 Day(s)	If a crime has not been recorded which justifies a higher level of MoPI recording then this group should be selected to retain the footage for a shorter period for these police powers. This section also covers property searches

2.5. Device allocation

There is no necessity for every person to have a personal issue BWV. The BWV camera will be issued based on threat, risk, regularity of usage, and the probability of evidence collection. This means that certain departments will have personal issue BWV whilst other departments can utilise pool BWV's.

2.5.1. Personal Issue

- Response Teams
- Neighbourhood Policing Team
- Firearms
- Roads Policing Unit
- Dog Section
- Schoolbeat
- Camera safety unit (Named persons who perform speed camera enforcement)
- Special Constabulary
- Op Vanguard
- Student officers
- Force Assessment Unit
- Mounted Section

2.5.2. Pool devices

- Criminal Investigation Department
- Major Crime Investigation Team
- Child Abuse Investigation Team
- Management of Sexual Violent Offenders
- Integrated Offender Management
- Force Intelligence Bureau
- Serious Organised Crime Unit
- Digital Intelligence Unit
- Covert Authorities Bureau
- Digital Source Handling Unit
- Special Branch
- Reactive Investigation Team
- Desktop Investigations Team
- Triage Team

2.6. Footage review via DEMS360

Employees must have legitimate policing purpose for accessing footage held within the DEMS. All actions are fully auditable and accessing footage without a genuine reason could result in disciplinary action.

Restricting of BWV footage within Reveal DEMS360 prevents anyone viewing the footage other than the officer or professional Standards Department.

The “cloaking” function within the Reveal DEMS360 restricts footage to PSD only.

Restricting of BWV footage should only normally take place as part of a Post Incident Procedure or on the instruction of PSD.

2.7. Internal and external use of BWV

2.7.1. Evidential

BWV will be utilised for criminal investigation, civil investigations, and if necessary in conduct and discipline related matters.

2.7.2. Professional Standards

PSD will only view BWV footage as a result of complaint or conduct issues that are brought to PSD attention, for the purpose of assessment or investigation. PSD will not view footage without a legitimate purpose, or seek out footage for the purpose of ‘catching’ officers out.

If during the course of a PSD investigation BWV footage reveals poor conduct by an officer that does not form a part of the investigation, this conduct will be addressed through the normal process of assessment and dealt with at the appropriate level.

PSD will consider the requirement to restrict access to BWV footage, where that footage forms part of a complaint or conduct matter.

2.7.3. Media and Public release

National advice has been released⁶ (Appendix A) to encourage forces to be more proactive in identifying BWV footage that can be shared in order to increase public transparency and build confidence in the legitimacy of our actions.

Any release of footage has to;

- Fulfil a legitimate aim – i.e. for a policing purpose⁷
- Is lawful (by reference to a basis in common law and/or statute)
- Is necessary
- Is proportionate with sufficient safeguards to fulfil the legitimate aim

On each occasion that the release of BWV footage is considered, professional judgement must be applied on a case by case basis, as no two scenarios will ever be the same. The rationale for the decision made should be documented for reference at a later stage if required. As well as utilising the National Decision Model, the following should be considered:

- The lawful basis for sharing
- The investigative impact of sharing
- The community impact of sharing
- The impact of sharing on the police workforce

Some examples of BWV sharing are;

- Trace wanted suspects
- Locating people who have escaped or absconded from custody
- Post-conviction demands for information⁸
- Support public confidence in policing
- Correct harmful misinformation circulating online⁹
- Demonstrate the significant challenges officers face
- Demonstrate our policing style and tone to reassure the community

The threshold for the release of footage in which people can be identified during an ongoing criminal or misconduct investigation is extremely high, but this is not an absolute barrier in the right circumstances when the release is for **a legitimate aim and it is lawful, necessary and proportionate** to do so. So this is still a viable option for responding to misleading citizen journalism, but it does not exist in isolation and must only be used in exceptional circumstances where less intrusive options do not meet the legitimate aim.

2.7.3.1. Media and Public release- Authority level required

The decision to share BWV with the public or media requires the rank of **Chief Inspector or equivalent** to consult with Communications and Engagement department prior to them approving any release.

All releases will require an authority form to be recorded and saved (Appendix B)

In complex cases where the decision making is unclear specialist legal and data protection advice should be sought. Further advice can be found on the [“Support with Body Worn Video”](#) intranet page

2.7.4. Training

⁶ NPCC BWV lead open letter dated 27/11/20

⁷ The MoPI Code of Practice defines **policing purposes** as: (a) protecting life and property; (b) preserving order; (c) preventing the commission of offences; (d) bringing offenders to justice; (e) any duty or responsibility of the police arising from common or statute law.

⁸ To illustrate the good work of the officers involved or when the case is of significant public interest

⁹ This should not attempt to limit citizen journalism

We will use BWV material to review and enhance how incidents are dealt with, improving the professionalism of policing and providing a powerful tool for behavioural change and continuous improvement.

Any training material will not contain, or will be edited to remove, any personal data that may lead to an individual being identified. Additionally, material which is still subject to any legal proceedings or where it has been used in a recent prosecution¹⁰ must not be used for training purposes.

2.7.5. Scrutiny panels

Scrutiny panels¹¹ are regularly used in our organisation to check that we are acting correctly and provide legitimacy to the public regarding our actions. Viewing BWV is a vital part of these panels so where available BWV will be reviewed by panel members where available under the following conditions.

Un-redacted disclosure of BWV to members of any scrutiny panels will be permitted when the member has signed a Confidentiality agreement. The BWV must only be shown to the members in a controlled environment where it can only be viewed by persons involved in the panel, and no recording of the visual imagery can be made by those watching. No remote access to BWV or documents will be permitted.

If a panel member does not sign a confidentiality agreement then only redacted BWV and documents can be shown. Due to complexities of redaction it may mean that no documents can be shared.

Additionally, material which is still subject to any legal proceedings or where it has been used in a recent prosecution must not be used.

2.7.6. Use of BWV in the Force Control Room

BWV can be used at the discretion of the Force Incident Manager (FIM) or control room Sergeant, when dealing with an incident where it will prove an evidential benefit. In the event of an Operation Plato activation this is a mandated request.

At the beginning of each operational shift, the radio shift supervisor or their representative is required to account for all BWV cameras under the control of the Force Control Room (6 in total) and ensure they are operationally functional (completed by a visual check to ensure in situ and charging).

BWV cameras are not to be removed from the control rooms without express permission of the FIM or control room sergeant.

The primary method of use for BWV in FCR will be for spontaneous Firearms incidents. In these situations, an email containing the incident number, serial number of the camera, the date/time of the use and the officers/users shoulder number must be sent to Marcus.Forbes-George@Gloucestershire.police.uk and the footage will be reassigned retrospectively ensuring MOPI compliance.

¹⁰ 3 months after prosecution case

¹¹ More information on the purpose, processes, and makeup of "Scrutiny panels" can be found on our internal and external website

Prior to the cameras being activated within the control room, the officer/user is to ensure that the staff on duty in the immediate area are notified of its use.

The camera must only be used for the duration of an incident (unless related to a Post Incident Procedure) and must not be left recording for extended periods of time if not related to an incident.

If a BWV camera is used, then the camera must be docked as soon as practicable (GTEC dock) after the incident to make it available for the investigation team.

When a BWV camera is used within FCR the officer using the BWV must record the serial number of the camera on the log for which it is used.

In the event of a PIP incident, the existing PIM process is to be followed.

2.8. Supervisory responsibilities

Direct line supervisors should (Sergeants)

- Talk with all staff to ensure they understand the policy and the benefits of BWV usage.
- Monitor that staff are regularly using BWV to:
 - Collect Evidence
 - Name recordings correctly
 - Save relevant recordings in line with MOPI requirements

Supervisors should regularly review individual evidential recordings from their staff to ensure that we are behaving in a professional and ethical manner. This method of monitoring will support personal discussions with our staff to allow continuous improvement and ensure we are compassionate and thoughtful during all interactions.

Second line supervisors should (Inspectors)

- Occasionally review evidential recordings from their staff to ensure that we are behaving in a professional and ethical manner.

Review of BWV for safety purposes

Sergeants and Inspectors should also routinely monitor BWV post searching of persons on the street utilising Stop and Search Powers and also Section 32 search powers. The reason for this monitoring is to scrutinise if the quality of the search was of sufficient quality to negate the person still having possession of a weapon or items that could cause the officer, themselves, or others harm.

Low BWV user report

Every quarter a low BWV user report will be generated and shared with geographic BWV leads. A three stage approach regarding poor use of BWV will result in the below:

- First time name appears on list – Sergeant/Inspector tasked to address
- Second time name appears on the list – Chief Inspector tasked to address
- Third time name appears on the list – Superintendent tasked to address

2.9. Mutual Aid

Our organisation has mobile facilities that can allow persons deployed on mutual aid to download material recorded and this will be stored on DEMS360 remotely.

2.10. Subject Access Requests (SAR)

A member of the public is entitled to any information that Gloucestershire Constabulary hold about them, which includes BWV footage. If a member of the public requests the footage that has just been recorded then they are to be directed to Gloucestershire Constabulary website where the request details can be found via the subject access request process.

2.11. Lost device reporting

The loss of a Body Worn Camera is considered a security incident and should be immediately reported by completing the [Security Breach form](#)

The line employee and line manager should investigate and attempt to trace the lost device.

2.12. Fault reporting

In the event of a device becoming faulty, the officer will submit a fault report to IT Service Desk via the online portal.

3. Procedural guides

Localised procedural guides can be found in Body Worn Video User Guide and Body Worn Video Training Guide

4. Relevant Legislation: (Human rights/diversity/Health & Safety/any other specifics)

All relevant legislation is contained and explained in;
[College of Policing Body Worn Video APP guidance](#)

5. Related References:

- [BWV user guide](#)
- [BWV training guide](#)
- [Body Worn Video guidance APP 2023](#)
- [Information Management APP](#)
- [Engagement and Communication APP](#)
- [Technical guidance for body worn video](#)
- [NPCC National Policing Position statement for BWV](#)

6. Identification, Monitoring and Review

The Policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to the policy or procedure, in line with the 'Statement of Intent' of the constabulary and the police service 'Code of Ethics', if an officer/ police staff member believes that they need to make a decision that steps outside of policy and procedure they should do so, provided that:

- the officer/ police staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken,
- produces, in a timely manner, a signed and dated written explanation of why it is/ was deemed necessary to step outside of policy and procedure, and
- maintain an adequate record of this written rationale for audit purposes appropriate to the circumstances/ contravention

GSC Security Marking:		OFFICIAL		
Type		Policy		
Department		URN	Strategic Board ‘signed off’	Author/Reviewer
Operations Department		272	PDB	Chief Inspector Paul Cruise
Version	Date	History of changes (ensure public copy amended and uploaded to external website)		Complied with Policy Guidance ✓
1.0	26/7/17	Original, very slight grammar amendments (10/10/17)		Yes
2.0	1/3/18	Updated to include section 2.4 Lost Device Reporting		
3.0	7/10/18	Amended to included reference to Reveal D5 cameras and remove reference to Edisex cameras		
3.1	9/11/19	Amended to include Exhibit Convention and inclusion of Professional Standards Section. SOPS/ SYOPS included on Intranet copy only		
4.0	27/11/20	Policy needed review so alterations made to bring policy directly in line with BWV APP		
4.1	4/12/20	Page 1- detail added to premises search Page 2- 2 criteria added for when not to record, record with caution section added, DEMS changed to DEMS360 Page 3- Media and public release section totally changed to reflect national guidance form BWV national lead. Appendix A and B added		
4.2		Policy consultation alterations; Page 4- The word “Complicated” removed and BOLD formatting used to emphasize the authority required to release BWV. Page 2- 2 x Bullet points added to “Other Important Instructions” to improve concern from public about recording, explain that there are other modes of harnessing BWV Page 5- Footnote added to explain scrutiny panels		
4.3	6/12/20	Policy consultation alterations; Page 3- PSD section reduced Section numbers added		
4.4	7/12/20	2.1- Paragraph reworded 2.1.3- Hospitals added		
4.5	14/12/20	2.5.3.1- Link added to guide staff regarding media release of BWV CJD advice received to necessitate; 2.1- Paragraph reworded to remove the word “Evidence” 2.2- Footnote 2 added to highlight need for all persons to mark as evidence Legal advice received to necessitate; 2.5.4- Footnote 7 added		
5.0	16/12/20	Policy 4.5 presented to CGB who recommended two changes prior to publication; 2.3.1- All Special Constabulary will received BWV		

		2.10- Added to explain BWV retention. In early 2021 detail will be added to provide clear table to guide employees.	
5.1	22/3/21	2.1.1- Every "Traffic Stop" added to when to record. This has been identified and recommended by HMICFRS 2.5.5- Wording changed to identify that supervisors should monitor BWV and dip sample for additional reasons. This is a HMICFRS recommendation 2.5.6- Slight wording changes made Section 7 changes to; Authority to release BWV link attached Scrutiny panel confidentiality agreement form added	
5.2	20/7/21	Section 2.5.5 " Development section " removed and added to Section 2.6. " Supervisory responsibilities " added to explain what supervisors have to comply with. In addition a section to explain how low usage is monitored and address included.	
5.3	20/12/21	Policy was scheduled to be checked in July 2022. However to ensure full compliance it has been reviewed early. Changes made; Hyperlinks all updated. 2.5.5- Scrutiny panel disclosure of BWV altered in line with guidance from the SIRO DCC Stratford who has instructed that no vetting is required.	
5.4	13/7/23	Section 1- Corrected hyperlinks to guide people to the singular "Support with BWV" intranet page Section 2.1- Four Core BWV principles section added Retention shortcut button added Section 2.2- Sentence added to explain how failed to record when required to do so may face increased scrutiny. In addition it could be considered as a breach of Police Conduct and Performance Section 2.2.1- Alterations made to "When to record" which include; Additional clarity added to one officer recording then all should record Additional entry made to advise officers to record when the public ask police to record- in line with APP Additional entry made to cover recording at mental health incidents Guidance provided connected with strip searches First accounts from victims of Sexual assault, Domestic Violence, and Child Abuse Section 2.2.2- Bullet points added to explain when not to record such as; Taking Statements Transporting prisoners Road Closures Scene Guards	

		Section 2.2.4- Inserted to explain how to deal with objections to recording Section 2.3- Additional advice added to cover; Commentary whilst filming Concluding recording Review of first accounts prior to making a statement Not to be used near suspect package Section 2.11- Moved to 2.4 to highlight importance. Also table added to simplify Retention Periods Section 2.4.1- Renamed 2.5.1 LPT officers changed to Response Teams Force Crimes Ops changed to Op Vanguard Section 2.3.2- Renamed 2.5.2 LPIH removed and adjusted to RIT/DIT/Triage Section 2.9- Renamed 2.11 New Security reach hyperlink inserted Section 2.12- Renamed 2.4 Sentence added to explain how failed to record when required to do so may face increased scrutiny. In addition it could be considered as a breach of Police Conduct and Performance Section 10- Appendix D added	
5.4	31/7/23	Section 2.6.5- Permission granted to allow scrutiny panels to share BWV in an external venue subject to control measures.	
6.0	18/7/23	Full review completed to allow Glospol Policy to be compliant with Manchester Arena Enquiry and BWV APP from 2023. Section 2.1.1- Every Traffic Stop changed to Every Vehicle Stop First Accounts from victims of RASSO offences altered to recent and non-recent Recording during prisoner transport added Section 2.1.2- Non recording during prisoner transport removed Section 2.7.6-	

		Added to give details of BWV usage in FCR Appendix D- Deleted as BWV APP 2023 supersedes this advise	
7.0	13/9/24	Moved to new corporate template Section 1- Policy intention fully reworded Section 2.2.1- Guidance added to explain about using BWV in custody New DPIA version 2.0 inserted	
7.1	26/11/24	During a HSE Inspection of Glospol in November 24, the recommendation from HSE stated that BWV should be checked to enhance safety. Hence the below insert has been added to this policy; Review of BWV for safety purposes Sergeants and Inspectors should also routinely monitor BWV post searching of persons on the street utilising Stop and Search Powers and also Section 32 search powers. The reason for this monitoring is to scrutinise if the quality of the search was of sufficient quality to negate the person still having possession of a weapon or items that could cause the officer, themselves, or others harm.	
Formatting and Publication:		Governance and Compliance Team	
Next Document Review Date: October 2023			
EIA/DPIA		EIA Sign Off – name and date	EIA Review – name and date
EIA LOW		Current EIA is version 3.0 This has not been added as a PDF to this policy because it is marked as Official. Version 3 saved in Main force BWV electronic storage	31/7/2023 Carl Bourne
DPIA LOW  DPIA Body Worn Video V 2.0.pdf		Current DPIA is version 2.0	8 th August 2024
Link to EIA – G&C to complete hyperlink action			
SIA – if required		SIA Sign Off	SIA Review
FREEDOM OF INFORMATION - This version will be placed on the public domain website			

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7. Appendices

Appendix A- NPCC BWV lead open letter dated 27/11/20



Marsh Advice to
assist decision making

Appendix B- Authority to release BWV to media

[Body worn video authority request form](#)



Body Worn Video
Authority Request For

Appendix C- Scrutiny panel confidentiality agreement



Scrutiny Panel
Confidentiality Agreeer



Conflict of Interest Policy

Policy Title

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Section 1 – Policy wording

This policy does **not** supersede the current Notifiable Association and Business Interest policies.

In its most simplest of terms, a 'Conflict of Interest' (COI) is any situation in which an officer, police staff, member of the Special Constabulary or volunteer with Gloucestershire Constabulary or employee of the Office of the Police and Crime Commissioner (OPCC) has a competing interest or loyalty and where it is arguable that a fair-minded and informed observer, having considered the facts, would conclude that there was a real possibility that the relevant person could be biased.

A 'COI' can exist in many guises – notably where an officer's, member of staff's, member of the Special Constabulary's or volunteer's or employee of the OPCC's personal interest conflicts with their own professional position. A 'COI' can typically arise where that relevant person has a private interest that might influence or be perceived to influence the delivery of their public service.

Crucially, the responsibility placed upon Police Officers, members of Police Staff, members of the Special Constabulary, volunteers and employees of the OPCC alike, is so great as to demand that whatever we do is done with integrity, impartiality and transparency. A 'COI' is not a negative reflection on the parties involved. However, failure to raise that conflict as and when it is identified prevents the Constabulary / OPCC taking swift action to manage against the suggestion of bias and may be damaging to the reputation and confidence in the Constabulary / OPCC. Under no circumstances should we find ourselves in a situation where our responsibility to discharge our duties is limited or hindered as a consequence of a personal or professional 'COI'. A 'COI' has the potential to undermine public trust in Gloucestershire Constabulary / OPCC and the Police Service in general.

All Police Officers, members of Police, members of the Special Constabulary, OPCC Staff and volunteers are required to declare a 'COI' to an appropriate manager / departmental point of contact (normally your Line Manager, but if not appropriate another suitable manager) as soon as this becomes apparent. Failure to report a 'COI' may result in disciplinary proceedings being considered.

The appropriate manager must consider whether the existence of the 'COI' is significant enough for further steps to be necessary and/or to separate or remove the individual from continuing involvement with the matter.

For example an officer has been tasked to investigate a case of minor assault – and discovers that the alleged offender is an acquaintance, e.g., a friend of a friend, a regular at the same local public house etc.



Conflict of Interest Policy

(This policy does not replace the responsibilities of all staff to adhere to the Notifiable Associations policy).

In the example above, the appropriate manager must consider whether in light of the declaration, it is prudent to allow the officer to continue with the investigation. By removing the officer from this investigation, it will negate any later suggestion that the officer treated the offender differently simply because of the relationship.

Equally, for example where a senior finance officer is party to a Constabulary / OPCC decision on the procurement of services for the Constabulary / OPCC and that person has an interest in the company that is offering the services e.g. knows the director, or other senior manager within that company – it would be necessary for the Senior Finance Manager to declare that interest.

Again it does not mean that the person would be removed from any decision making but by highlighting the fact that the 'COI' exists, will provide greater transparency should that matter ever be the subject of scrutiny.

Each possible 'COI' will be considered on a case by case basis and it may be necessary for the appropriate manager to seek further guidance and advice in making a final decision.

Irrespective of the decision that is reached, it is essential any consideration of a 'COI' is accurately and formally recorded. Further advice can be taken from PSD.

To ensure 'COI' are identified and managed, the following will take place in the Constabulary:

- All Governance meetings within the Constabulary / OPCC must have a standing agenda item requiring all in attendance to declare any known Conflict of Interest at the commencement of meetings. The minutes must reflect any declarations and the chair's decision to remove or retain the member of staff.
- This Policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to the policy or procedure, in line with the 'Statement of Intent' of the Constabulary and the police service 'Code of Ethics', if an officer, police staff member or volunteer believes that they need to make a decision that steps outside of policy and procedure they should do so, provided that:
 - the officer, member of police staff, member of the Special Constabulary, volunteer or OPCC staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken,
 - produces, in a timely manner, a signed and dated written explanation of why it is/ was deemed necessary to step outside of policy and procedure, and
 - maintain an adequate record of this written rationale for audit purposes appropriate to the circumstances / contravention



Conflict of Interest Policy

Section 2 – Procedural guides

When a Conflict of Interest (COI) is identified:

- Bring the matter to an appropriate manager's attention as soon as possible.
- Ensure you provide the manager with all the information you are aware of.
- Allow your line manager to consider whether there is a COI.
- In the event a COI is identified, the manager is expected to articulate and record a proportionate rationale for removing or permitting that officer, member of staff, member of the Special Constabulary, volunteer or OPCC staff to continue with that particular matter. This record should be capable of retrieval at a later date e.g., on an incident or crime report or other appropriate system.
- In case of a COI involving procurement / financial matters, the report **MUST** be copied to the Head of Finance.
- At all Governance meetings, all participants must declare any COI and minuted accordingly.

Section 3 - Relevant Legislation: (*Human rights/diversity/Health & Safety/any other specifics*)

Data Protection Act 1998:

The information provided will be processed in accordance with data protection principles as set out in the Data Protection Act 1998. Data will be processed only to ensure that the Constabulary is transparent in its dealings with members of the public and is accountable when using public funds. The information provided will not be used for any other purpose.

Section 4 - Related References:

Notifiable Associations Policy



Conflict of Interest Policy

Section 5 - Identification, Monitoring and Review

Security Marking:		NOT PROTECTIVELY MARKED		
Document Title: POLICY				
Policy				
Type		URN	Strategic Board	Author/Reviewer
Policy		271	MEB	Kevin McCloskey
Version	Date	Changes (ensure public copy amended and uploaded to external website)		Complied with Policy Guidance ✓
DRAFT	10/5/2017	Document created and implemented on to corporate template		✓
V1	2/8/2017	Policy completed and sent to the IGB for sign off in September		
	4/1/2018	Watermark 'DRAFT' removed, left on in error - TS		
V1a	5/1/2018	EIA added		
V1.1	27.02.2020	Policy reviewed by Joanne Mercurio– No amendments needed		
Next Document Review Date: 2/8/2018				
EIA		EIA Sign Off		EIA Review
LOW K:\Waterwells\Equality Impact Assessment\Conflict of Interest Policy - EIA Oct 2017.doc		Steve Jacques/Kevin McCloskey		2/8/2020
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Previous policies can be found with the Governance and Compliance team.



Notifiable Association Policy

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Section 1 – Policy Intentions

The purpose of this policy is to safeguard the integrity of individual officers and staff and to prevent actual or perceived compromise to operations and intelligence.

This policy is intended to provide guidance to members of the Organisation who, through the course of their daily lives, come into contact with individuals with whom the association may cast doubt onto their integrity as to why that relationship exists. Or the association may undermine the confidence of the communities that we serve.

Section 2 – Policy wording

It is accepted that members of the Constabulary are drawn from society and are representative of it. Some staff will inevitably maintain associations with individuals who have come to police notice before. There are occasions where such an association may mean that staff become at risk of having their integrity called into question or of damaging the reputation of the Organisation and public confidence in Gloucestershire Constabulary.

This policy applies to all police officers and police staff, all members of the special constabulary and all volunteers. **It also applies to the Office of the Police and Crime Commissioner.** The term employee used within this policy should be taken to include all those in the above named groups.

Where an employee suspects or becomes aware of an association that may make them personally vulnerable they should consider this policy and if necessary notify the Anti-Corruption Unit (ACU), as per the procedure section of this policy.

All employees who know or suspect that another person may be vulnerable as a consequence of an association and have cause to think the association has not been reported to the Organisation, must report the association into the ACU as per the procedure section of this policy.

System checks should never be made to check a belief or suspicion that a person may have had contact with the police. There is no exemption from the Data Protection Act 1998 in

relation to force employees accessing information to determine whether an association requires declaration.

A notifiable association includes the following:

- Persons with unspent criminal convictions
- Persons charged with a criminal offence where the matter remains unresolved
- Persons known to be under investigation for, but not yet charged with, a criminal offence
- Persons who are the subject of criminal intelligence or who are of interest
- Persons dismissed or required to resign from police service or other LEA (Law Enforcement Agency)
- Former law enforcement officers now working in an investigative role (e.g. private investigators and legal firms)
- Television, print and online journalists
- Individuals who are members of or have associations with extremist groups

This list is not exhaustive and there should always be early conversations with the ACU or the PSD department if there is any doubt. An association should always be reported rather than not being reported so that an assessment can be made.

Association has its normal everyday meaning in this context i.e. meeting or uniting for a common purpose, keeping company or being familiar with, being an ally, confederate, partner, colleague, having a friendship, intimacy or connection, being a member of a group, organisation or society which is formed for the promotion of a common objective or aims.

This includes associations via social media.

Notifiable associations should not include individuals with whom the officer or staff member has a purely professional on duty relationship. The term association is not intended to include a person with whom a staff member knows casually, or has a chance meeting with occasionally.

It is not the intention of this policy to unnecessarily restrict employees right to privacy and any decision making will be undertaken in a lawful, proportionate and reasonable manner.

Failure to report an association that may make an employee and/or the organisation vulnerable may render that employee subject misconduct or discipline procedures.

Section 3 – Procedural guides

Employees who are aware or suspect that such an association exists should complete the Notifiable Association Form, Appendix A.

Prior to completion advice may be sought from a supervisor, the Police Federation, the Superintendents Association or Unison.

All disclosures will be managed in confidence and employees can take the opportunity to have a discussion with the ACU prior to submission should that assist them.

When completed the form should be electronically sent to the ACU inbox.

If you become aware of an association concerning someone else, there is the option to let the ACU know via the [ACS \(Anonymous Contact System\)](#) or via the [Crimestoppers Integrity Hotline](#).

When the form has been received a decision will be made as to whether system checks will be conducted to assess the vulnerability.

Staff should be aware that any information that they disclose in relation to ongoing criminal activity may result in consideration of further investigation and action being taken.

Any identified vulnerable associations may be reviewed by the ACU. During the course of the review a vulnerability interview may be required. This interview is to establish more information around the association and clarify details of any initial notification. It is not a formal process, rather an opportunity for the reviewing of information in order to ensure an accurate and detailed assessment can be made. The individual employee will be entitled to support and advice from their relevant staff association or Unison representative.

At the conclusion of this process the ACU will provide a report to the Head of Professional Standards outlining the circumstances of the association and a risk assessment score based on a matrix supplied by the NCA.

At the conclusion of the review the employee will be informed whether the association is deemed appropriate by the Head of PSD.

If the determination is that the association may make the employee and/or the organisation vulnerable, then they will be advised of restrictions that are intended to minimise the vulnerability or that their association must cease.

Any notification may result in the information being shared with the Vetting Department for their consideration.

Where the employee seeks to appeal against the determination made by the Head of PSD, they should submit an appeal in writing to the The Chief Officer with the delegated authority from the Chief Constable as the Appropriate Authority (AA) within 14 days from receipt of the determination.

Any appeal must identify why the member of staff disagrees with the determination. Advice and support will be available from the member's staff association or Unison who may make their written representations within the document.

All appeals to the should be made via the Head of PSD. The appeal will be considered within 28 days of receipt.

Whilst subject to an appeal process, the employee will be informed of any direction to restrict the association.

The AA will chair a strategy meeting to discuss the association with any parties the AA considers appropriate to attend.

At the commencement of that meeting the employee submitting the appeal may be given the opportunity to make personal representations during which they may be accompanied by a colleague or staff association representative. The AA may then ask them to leave the meeting during the decision making process.

The AA may on review decide to uphold the appeal, confirm the determination given in relation to the association or vary its conditions.

Subject to a determination in relation to a vulnerable association having been served on any employee and the appeal process having been exhausted, any failure to comply with the determination may result in the individual being made subject to misconduct or discipline procedures

Section 4 - Relevant Legislation: (Human rights/diversity/Health & Safety/any other specifics)

List/link any relevant papers to be considered – Free text

[Link to Human Rights](#)

[Code of ethics](#)

[Police Code of Conduct](#)

[Staff regulations/police staff handbook](#)

[Police amendment regs 2014](#)

[Police regs 2003](#)

Section 5 - Related References:

List/link any relevant papers to be considered – Free text

[ACS \(Anonymous Contact System\)](#)

[Crimestoppers Integrity Hotline](#)

Section 6 - Identification, Monitoring and Review

The Policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to the policy or procedure, in line with the 'Statement of Intent' of the constabulary and the police service 'Code of Ethics', if an officer/ police staff member believes that they need to make a decision that steps outside of policy and procedure they should do so, provided that:

- the officer/ police staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken,
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Appendix A

[Notifiable Association Report Form](#)

GSC Security Marking:		OFFICIAL/OFFICIAL-SENSITIVE	
Type	Policy		
Department	URN	Strategic Board ‘signed off’	Author/Reviewer
	Obtain from G&C team	IGB – include date signed off	DI Jo Mercurio

Version	Date	History of changes (ensure public copy amended and uploaded to external website)	Complied with Policy Guidance ✓
Version 1	2015	New template created	
Version 2	Aug 2017	New corporate heading and official marking & decision making wording added	
Version 3	April 2018	Name change to policy throughout to fit in with the NPCC and to make the need to report such associations clearer.	
Version 4	August 2021	Updated Notifiable association form attached	
Formatting and Publication:		Governance and Compliance Team	
Next Document Review Date:			
EIA		EIA Sign Off – name and date	EIA Review – name and date
LOW K:\Waterwells\Equality Impact Assessment\Notifiable Associations Policy EIA April 2018.doc			
Link to EIA – G&C to complete hyperlink action			
SIA – if required		SIA Sign Off	SIA Review
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