The Bikeability Trust Helmet Camera Guidance

The Bikeability Trust do not recommend the use of helmet cameras during Bikeability training due to the complexities of enforcing safe use, storage of data and gaining consent.

Other factors such as the possible social impact of wearing helmet cameras should also be taken into consideration, for example giving the impression that the road is an overly dangerous place and potentially exacerbating the ‘us against them’ mentality between road users who choose different modes.

If grant recipients/training providers/instructors do feel it is beneficial to use helmet camera’s during training sessions then the following must be taken into account, and all risk assessments/processes and policies documented;

* A full risk assessment would need to be undertaken, the results of which would need to be carefully considered.
* A process of weighing up the importance of all the different factors for and possible obstacles or difficulties of using helmet cameras would need to be completed by the training provider/grant recipient before using helmet cameras.

Given those being recorded are children, an appropriate balance might be difficult to achieve as the parent or guardian will not have given their consent and have the right to object. Consent could be a difficult matter as must be freely given (i.e. the parent must be able to say no) and if one parent decides to withhold consent whilst others had consented to the session being recorded, the child whose parents had withheld consent would need to be excluded. This could cause another set of issues for all parties to solve.

* All relevant and related policies would need to be updated and clear policy decisions and legal considerations should be made about;
* How long footage may be kept
* Who it might be shared with
* Where the data will be stored.  Are the recordings stored locally or are they backed up to a cloud or both? Where is that cloud located (likely to be outside the UK so a risk assessment might be necessary)?
* Are deleted files permanently deleted from such cloud arrangements?
* When shared for an identified purpose, what would the lawful basis be?
* Where are the devices stored when not being used by the instructor?
* If files are downloaded from the cloud to a computer there may be duplicate files, so this must be accounted for
* Do the instructors use such devices for other purposes?
* Do the instructors ever share such devices with other parties?
* The cameras would need to be the property of the training provider/grant recipient to ensure full control of the footage could be maintained in accordance with their obligations to UK data protection law. Any downloading of footage should only be made to a corporate device under the control of the training provider/grant recipient.  This would need to be written clearly into a process/policy and training provided to staff.
* Training would need to be provided to the instructors. This would include, but is not limited to, when to start and end the recording, how to store the camera safely and how to share the footage when required.
* A robust assurance process must be in place to check that guidelines are fully complied with by all parties.
* Making such footage to solely protect the instructor would not be a suitable measure and in any event may be overridden by the rights of the children.
* The use of personal devices will always represent risk and the bigger question of enforcing the rules must always be considered.
* The potential safeguarding issue of recording children without following the suggested guidelines must be considered carefully.