



## **Industry Guidance: Use of Body-Worn Cameras by SIA-Licensed Door Staff in Northern Ireland**

**This guidance document is intended as a practical overview of key issues – but please note that it does NOT replace legal advice.**

### **1. Purpose & Scope**

This guidance is aimed at hospitality premises in Northern Ireland who employ or engage door supervisors and are considering deploying body-worn cameras (“body cams”). It sets out permissible use, obligations, risks, and best-practice implementation.

### **2. Regulatory & Licensing Requirements**

#### *2.1 SIA Licensing*

Door supervision in Northern Ireland is a licensable activity under the Private Security Industry Act 2001. The SIA states that using or reviewing footage from a body-cam can require a licence. If footage is monitored or used to identify individuals, this may amount to CCTV surveillance requiring the appropriate licence. Supervisors may require a non-front-line licence.

#### *2.2 Additional Frameworks*

Body-cam use engages data protection (UK GDPR / DPA 2018), privacy rights, employment law, and any conditions on a venue’s alcohol or entertainment licence. Duty-of-care and insurance implications must also be considered.

### **3. What Is Allowed / Not Allowed**

#### *3.1 Allowed*

– Use for legitimate safety/security purposes.

- Transparent use with signage or verbal notification.
- Staff trained in activation, deactivation and handling.
- Proportionate use aligned to venue risk profile.
- Secure storage, controlled access and documented retention.

### *3.2 Not Allowed*

- Indiscriminate or covert monitoring without justification.
- Using footage for purposes beyond safety or incident evidence.
- Recording in sensitive/private areas.
- Retaining footage longer than necessary.
- Allowing unauthorised access or exporting footage improperly.

## **4. Business Obligations**

### *4.1 Policy & Procedure*

A written policy should cover: deployment conditions; device management; training; signage; access protocols; retention and deletion; incident workflow; and review processes.

### *4.2 Data Protection & Privacy*

- Lawful basis: typically legitimate interest; must be documented.
- Privacy notices: displayed at entrance and in venue policy.
- DPIA recommended before implementation.
- Rights handling: individuals may request access to footage.
- Secure storage: encrypted, access-controlled, with audit logs.
- Retention: time-limited (e.g., 30 days unless incident-related).

### *4.3 Licensing & Insurance*

- Ensure all door supervisors hold the correct SIA licence.
- Confirm body-cam use does not trigger CCTV-operator requirements.
- Ensure contractor security firms are properly licensed.
- Check insurer coverage for surveillance and data-handling.

## **5. Practical Considerations**

### *5.1 Equipment Selection*

Choose professional devices with tamper-proofing, timestamping, strong low-light video, and secure transfer to controlled storage.

### *5.2 Training & Deployment*

Train staff on usage, triggers for activation, dealing with patron challenges, incident flagging, and privacy obligations.

### *5.3 Patron Communications*

Provide signage at entrances. Staff should be able to explain calmly why recording is taking place.

### *5.4 Monitoring & Review*

Regularly audit usage, review incident footage, update policy annually, and document compliance.

## **6. Key Questions for Businesses**

- Do all door supervisors hold valid SIA licences?
- Does body-cam use create additional surveillance licensing duties?
- What is the lawful basis for processing footage?
- How are patrons informed?
- Are retention/deletion processes robust and documented?
- Who can access footage and under what conditions?
- Is insurance cover sufficient?
- How will incident footage be handled and shared with PSNI if needed?

## **7. Best-Practice Checklist**

- ✓ SIA-licensed staff only
- ✓ Clear written policy
- ✓ Staff training completed
- ✓ Signage displayed
- ✓ Secure storage in place
- ✓ Defined retention periods
- ✓ DPIA completed

- ✓ Regular audits carried out
- ✓ Incident workflow documented
- ✓ Insurance verified

## **8. Conclusion**

Body-cams can enhance safety and evidence-gathering for hospitality venues, but they introduce regulatory, privacy and operational obligations. A clear policy, strong training, transparent communication, secure data handling, and regular review are essential for compliant and effective use.