

## Privacy Notice

### GoodSAM communication system



This privacy notice tells you what we do with personal information when it is collected using a communication system called GoodSAM.

#### **About GoodSAM and why we use it**

It is a communication system which allows you to live-stream video, share your location, chat to us via a message and communicate with us via two-way video consultation. It also allows you to send us a file from your phone instantly. It works by us sending you link which you can choose to accept.

GoodSAM has many benefits to the public and policing. For example, it can improve public confidence by making you feel safe and prevent violence in public spaces. It can also aid police decision making, police resources and capture key evidence to apprehend offenders. Our key reasons for using GoodSAM are to:

- Protect life and property
- Preserve order
- Prevent the commission of offences
- Bring offenders to justice
- Help us to comply with statute and common law duties or responsibilities

#### **The types of information we will use**

We will collect and use of personal information relating to members of the public as well as our police officers and staff. Examples include:

- The person's telephone number or email address
- Location information gathered from the person (only if using the location services feature)
- Footage relating to an incident (only if using the instant video feature) or video consultation. This may contain the image of the suspect/offender, other witnesses, the reporting person, victim and police officers
- Any obvious physical health or mental health condition, race/ethnic origin, religion and sexual orientation could be captured depending on what is captured during the live stream.
- Forename, surname and corporate email address of our police officers and staff.

#### **Who we might disclose information to**

Information collected could be shared with some established organisations, most commonly, the Crown Prosecution Service. However, it could also extend to other agencies, Local Authorities and other emergency services. We have a list of organisations we share with on our [general privacy notice](#).

We have a contract in place with GoodSAM to allow them to securely store data on our behalf when it's initially within the GoodSAM system. [GoodSAM also have a data protection policy](#).

### **How its use is lawful**

We may request to use this communication system in order for us to carry out a law enforcement task such as: the prevention, investigation, detection or prosecution of criminal offences or execution of criminal penalties. To safeguard against, and prevent, threats to public security. This is likely to be necessary for the administration of justice and to protect people from serious harm (vital interests).

We may also need to fulfil other tasks which are in the public interest, such as help to find people who are missing from home and attend to someone when there is a concern for their safety. We need to do this to protect people from serious harm (vital interests), to comply with statutory functions and to safeguard children and vulnerable people who are at risk. We may also use the video consultation feature to facilitate victim updates in line with the Victim's Code of Practice.

The information collected will be used in accordance with UK Data Protection law. A Data Protection Impact Assessment has been carried out by Cheshire Police which has considered the above law, as well as the [Human Rights Act 1998](#), [Surveillance Camera Code of Practice](#) and the [Collage of Policing Approved Professional Practice](#).

### **How long we keep data**

All media data obtained via GoodSAM is subject to an initial review period of 31 days. On review, files and footage will be retained further if it is necessary and proportionate for the purpose or purposes for which it was obtained. Where material is evidential or potentially evidential, this will be in line with the [NPCC Review Retention and Disposal Schedule](#) and government guidelines set out in the [Home Office \(2005\) Code of Practice on Management of Police Information \(MoPI\)](#).

Chat data will be stored on our key incident/contact recording system. This data is held for 2 years in the live system and then archived for 7 years. Where a chat is needed for evidential purposes, it will be stored in line with the above mentioned NPCC retention Schedule and Code of Practice on MoPI. Chat data will also be stored within GoodSAM for the length of the contact. Staff access to this system is limited with appropriate access level controls.

### **Your rights**

Activation of this technology is voluntary.

Data Protection law provides you with rights when we hold information which can identify you. These rights are subject to certain grounds and exemptions but include:

- To [request a copy](#) of your information. Known as 'subject access'
- To [object](#) to the use of your data which has been collected for non-law enforcement purposes (such as missing from home and concern for safety).

- To [request erasure](#) where law enforcement data infringes a data protection principle, or where non-law enforcement data is no longer needed, an objection request has been upheld, it's been unlawfully used or we are required by law to delete.
- To complain to our [Data Protection Officer](#) or the [Information Commissioner](#).

Due to the dynamic and emergency nature of policing, it's unlikely that Cheshire Police will be able to provide this privacy notice directly to individuals at the time of collecting information. Instead, it will be made available via text message after the capture. Suspects and offenders are also unlikely to receive this notice as it could undermine the policing purpose. Instead, the Data Protection Act 2018 allows law enforcement bodies to make this notice generally available on their website.