

Fleet Audio Recording

UK Compliance Checklist

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Before Enabling Audio Recording in Fleet Vehicles

Step 1 — Establish Operational Justification

- ☐ Document the specific operational risk that requires audio (not just 'it's available')
- ☐ Confirm audio adds value that video alone cannot provide
- ☐ Decide: continuous ambient recording OR triggered only (panic button / incident event)
- ☐ Consider triggered recording as the default — more proportionate, easier to defend
ICO guidance: use audio only in exceptional circumstances

Step 2 — Data Protection Impact Assessment (DPIA)

- ☐ DPIA completed BEFORE any audio-capable system is switched on
- ☐ DPIA covers: what data, why, retention period, access controls, risk mitigations
- ☐ DPIA reviewed and signed off by data protection lead or DPO
- ☐ DPIA stored and accessible if ICO requests it

Step 3 — Lawful Basis Documentation

- ☐ Identify lawful basis (typically Legitimate Interest for employee monitoring)
- ☐ Legitimate Interest Assessment (LIA) completed and documented
- ☐ LIA demonstrates operational need outweighs driver privacy interest
- ☐ Note: consent is rarely appropriate for employee monitoring

Step 4 — Driver Communication & Contracts

- ☐ Employment contracts or fleet camera policy updated to reference audio recording specifically
- ☐ Blanket 'vehicles may be monitored' clause confirmed NOT sufficient for audio
- ☐ All drivers informed in writing before audio recording goes live
- ☐ Policy explains: what is recorded, when, retention period, who can access

Step 5 — Signage & Transparency

- ☐ Vehicle signage updated to reference audio recording (not just video)
- ☐ Signage visible at point of entry / in cab
- ☐ PSV/taxi operations: passenger-facing notice updated if carrying public

Data Retention

- ☐ Audio retention policy defined (recommended: 28–31 days, same as video)
- ☐ Automated deletion or regular manual purge process in place
- ☐ Access to audio recordings restricted to authorised personnel only
- ☐ Audit log kept of who accessed which recordings and when

Subject Access Requests (SARs)

- ☐ Process documented for responding to SARs within one month
- ☐ Audio recordings included in SAR scope (not just video)
- ☐ Redaction process in place for third-party voices before disclosure

Periodic Review

- ☐ Annual review: is audio still proportionate to the operational risk?
- ☐ DPIA updated if operational context changes (new routes, new vehicle types)
- ☐ Driver briefing refreshed if camera policy is updated
- ☐ ICO guidance checked for updates — vehicle surveillance guidance is reviewed periodically

If You Decide NOT to Enable Audio

- ☐ Audio function disabled on all camera systems that have it enabled by default
- ☐ Decision documented in fleet camera policy
- ☐ IT / installation team confirmed audio is off — not just assumed