

UK Fleet MDVR Compliance Checklist

backwatch.co.uk — Fleet Vehicle Safety Equipment

ICO Registration

- ☐ Register with the Information Commissioner's Office (ico.org.uk)
- ☐ Pay annual data protection fee (£35 for most SMEs)
- ☐ Confirm MDVR operation is included in registration scope
- ☐ Set a calendar reminder for annual renewal

Lawful Basis Documentation

- ☐ Complete a Legitimate Interests Assessment (LIA) for MDVR recording
- ☐ Document purposes: driver safety, incident evidence, fraud prevention
- ☐ Keep LIA on file and available if challenged
- ☐ Review LIA if recording purposes change

Fleet Camera Policy

- ☐ Issue written fleet camera policy to all drivers
- ☐ Policy covers: what is recorded, who accesses footage, retention period
- ☐ Reference policy in employment contracts or driver handbook
- ☐ Record that each driver has received and acknowledged the policy

Vehicle Signage

- ☐ Fit 'CCTV in Operation' notice visible from outside each vehicle
- ☐ Notice directs to company privacy information (website/printed)
- ☐ Check signage condition on vehicles — replace if faded or damaged

Data Retention

- ☐ Set MDVR continuous loop to overwrite after documented period (e.g. 30 days)
- ☐ Document retention period in fleet camera policy
- ☐ Lock/extract incident footage promptly — do not rely on loop protection
- ☐ Delete incident footage when the related claim or matter closes

Camera Installation (Construction & Use)

- ☐ Windscreen-mounted cameras: no more than 40mm into wiper sweep area
- ☐ Camera positions reviewed and signed off at installation
- ☐ Cable runs do not cross driver controls or obstruct entry/exit
- ☐ Installation checked at next MOT

DVS / Progressive Safe System (HGV Operators)

- ☐ Identify all vehicles over 12 tonnes that operate in Greater London
- ☐ Confirm DVS star rating OR PSS installation for each London-route vehicle
- ☐ Verify PSS camera system meets TfL published specification
- ☐ Keep TfL compliance documentation on file

Subject Access Request Readiness

- ☐ Identify who in the organisation handles SARs
- ☐ Document process for responding to footage SARs within 30 days
- ☐ Know which vehicles have footage within current retention window
- ☐ Know how to redact third-party individuals from footage if required