



OFFICE OF THE BIOMETRICS
AND SURVEILLANCE
CAMERA COMMISSIONER

Professor Fraser Sampson
Biometrics and Surveillance Camera
Commissioner
2 Marsham Street
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www.gov.uk/government/organisations/biometrics-and-surveillance-camera-commissioner

Justin Hollis
Marketing Director
Hikvision UK & Ireland

Dear Justin

Correspondence with Local Authorities

Having been contacted by local authority and police representatives in relation to your latest correspondence in which you announce your company's 'recommitment' to the UK surveillance market, I would once again invite you to address the concerns that have continued to be widely and loudly expressed by surveillance partners across the UK.

To be very clear, there are two 'limbs' to the areas of concern that have been raised with my office and that I in turn have raised with you, with partners and with Parliament. The first limb can broadly be categorized as data security and the extent to which surveillance companies can be trusted with our surveillance data and their provision of accountable surveillance camera systems. It was in relation to this first data-specific limb that the government announced its removal of some systems and equipment from unnamed sites of specific sensitivity last November. While I am not privy to the Cabinet Office's letter to your company to which you refer, I find it difficult to reconcile that action by the government with your assertion that "The Government's decision endorses the security credentials of Hikvision's products".

I am, as you know, independent of government and from my statutory perspective trust is both imperative and absolute: when it comes to increasingly intrusive surveillance by the police and local authorities you cannot 'partly' trust someone, and it appears to me that our government does not entirely trust some companies.

The second limb of concern, as you are fully aware, is that of your company's association with well-publicised human rights abuses of minority communities in China. I would characterize these concerns as, to borrow your phraseology, "a growing consensus around the integrity" of surveillance partners "across the UK and Ireland as well as internationally". I note from your latest correspondence that you make no reference at all to this critical issue.

If you were to apply for a job as a police surveillance operative in the UK, you could reasonably expect to be asked questions from your CV in relation to previous surveillance experience and activity. Were you pointedly to refuse to answer those questions then you would be excluding yourself from working as a trusted surveillance partner. In my view the same considerations and expectations should apply to companies seeking to become trusted surveillance partners within policing and local government: by refusing to discuss matters on your corporate CV you are thereby excluding yourselves from being invited into trusted surveillance partnership.

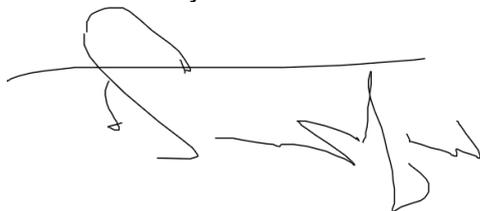
In that regard I would invite you, once again, to address the straightforward questions that I asked of you in my letter of 16 July 2021 (attached) which relate directly to both limbs of public trust and confidence as raised with me by local authorities and the police. For ease of reference the questions are repeated below:

- 1)** Could you confirm whether your camera technology has in fact been used in the Uyghur internment camps and whether you accept that there is, at least to that extent, such an 'association'?
- 2)** I would be very keen to see any evidence you have as the question of how far the public can put their trust in such surveillance technology is currently one of the most pertinent and prevalent in this area, as concerns were raised by two academics, "about data collected from facial recognition cameras that could be used by the Chinese Government."
- 3)** Is it your position that Hikvision had no knowledge of the use(s) of its surveillance camera systems in the internment facilities?

I believe that a hallmark of public accountability is a preparedness, not only to respond to proper challenge, but to invite it. If Hikvision are sincere in your 'recommitment' to working as a trusted surveillance partner within policing and local government in England and Wales, it will be essential for you to address trust and confidence from both aspects and I would encourage your company to recognise that, while data security is a critical element, the ethical and human rights considerations often weigh more heavily with the many institutions, individuals and their democratic representatives with whom I have worked over the years since I first wrote to you.

I look forward to receiving your response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fraser Sampson', written over a horizontal line.

Fraser Sampson
Biometrics and Surveillance Camera Commissioner England & Wales
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