# Body Worn Video Cameras (BWVC) Privacy Impact Assessment

**March 2017**

**Chichester District Council**

## Contents

Section 1 The Project Page 3

Section 2 Privacy Impact Assessment Screening Questions Page 3

Section 3 Consultation Page 4

Section 4 Privacy and Related Risks Impact Assessment Page 5

## Section 1 - The Project

Civil Enforcement Officers (CEOs), through the nature of their work, are sometimes subject to aggressive and/or abusive encounters.

There are already several policies and procedures in place including the Lone Working Policy and the use of mobile phones and/or radio communication systems to help manage the risk. In addition to this we would like a body worn video camera (BWVC) to be worn. This device records sound and pictures, which will help the Officer gather unambiguous evidence and add an extra level of security. The system acts largely as a deterrent and the device does not record unless the Officer switches it to the on position.

The intention is for Civil Enforcement Officers to use BWVC to:

• Raise standards of service

• Reduce incident escalation

* Be used in the process of civil enforcement to ensure that it is accurate and transparent

• Reduce complaints

Staff will be required to use the equipment in line with the associated policy, procedures and organisation strategies. They will receive full instructions in its use and the relevant legislation.

The Council will monitor the use of the BWVC to ensure that the equipment is an appropriate tactic and that the use is in line with policy and procedure.

## Section 2 - Privacy Impact Assessment Screening Questions

In order to assess the need for a privacy impact assessment to be completed the following questions were considered.

**Will the project involve the collection and handling of new information about individuals?**

Yes, video recordings will be taken when issuing a penalty charge notice and during any abusive/aggressive interactions with the public to support existing written evidence. This will be managed by fully auditable software in accordance with Data Protection requirements.

**Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?**

No, information may be in a different format but will continue to be used as previously in accordance with Data Protection.

**Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?**

The video footage will capture exactly what is seen by officers attending an incident and will be used to support the current use of written evidence. It will be managed in accordance with Data Protection.

**Does the project involve you using new technology which might be perceived as being privacy intrusive?**

BWVC has the potential to be privacy-invasive however:

* Civil Enforcement Officers will declare that the incident is being recorded.
* The device is worn overtly.
* The subject can see that they are being recorded on the device’s screen (dependant on the type of device used)

**Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations?**

The CEOs have very clear procedures regarding the use of BWVC; however there is always the potential for BWVC to capture members of the public who have no involvement in the incident being recorded. This will be managed by the fully auditable software and in accordance with Data Protection requirements.

## Section 3 – Consultation

To help identify and address any privacy risks the following people have been consulted with:

Civil Enforcement Officers

Legal Services

Head of Business Improvement Services

HR

Senior Management

Unison

In addition we have drawn on the experience of other people already using BWVC e.g. the Police, and will be advising the public of the implementation of the devices through the use of a robust communications plan.

## Section 4 – Privacy and Related Risks Impact Assessment

Below is a table of the key privacy and associated risks identified for this project, shown with solutions to help manage the risk.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Privacy Issue** | **Risk to Individuals** | **Compliance Risk** | **Associated Organisation/**  **Corporate Risk** | **Solution** | **Result (risk eliminated, reduced or accepted)** |
| 1. | Personal/private conversations are recorded. | Unjustified intrusion on people’s privacy | * Non-compliance with the DPA. * Non-compliance with human rights legislation. * Non-compliance with the Privacy and Electronic Communications Regulations. * Non-compliance with sector specific legislation or standards | * Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage * Public distrust about how information is used can damage an   organisation’s reputation and lead to loss of business. | * Officer training will cover the need to aim and focus the device appropriately in order to capture evidence and minimise the risk of third parties being filmed or their conversations being recorded. | Reduced |
| 2. | Information viewed by an unauthorised person. | Sensitive information viewed by a 3rd party. | * Non-compliance with the DPA. * Non-compliance with human rights legislation. * Non-compliance with the Privacy and Electronic Communications Regulations. * Non-compliance with sector specific legislation or standards | * Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage * Data losses which damage individuals could lead to claims for   compensation. | * Recordings are only viewed by authorised personnel in a secure room in accordance with the associated policy and procedures. * Cameras are encrypted and footage can only be viewed using specific fully auditable software. * The storage of recordings is password protected on an approved Council device. | Eliminated |
| 3. | BWVC lost and found by a member of the public | Sensitive information viewed by a 3rd party. | * Non-compliance with the DPA. * Non-compliance with human rights legislation. * Non-compliance with the Privacy and Electronic Communications Regulations. * Non-compliance with sector specific legislation or standards | * Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage * Data losses which damage individuals could lead to claims for   compensation. | * Cameras are encrypted and footage can only be viewed using specific fully auditable software. | Eliminated |

Responsibility for ensuring solutions delivered: Tania Murphy, Parking Services Manager

Approved by: Jane Hotchkiss, Head of Commercial Services