

Island Roads

Privacy Impact Assessment for the use of Body Worn Cameras

PRIVACY IMPACT ASSESSMENT

A	Name of Service	Island Roads CIP – Traffic Management
B	Project	Body Worn Cameras (BWC)
C	Background	<p>Island Roads is a partnership made up of VINCI Concessions, Meridiam Infrastructure and Ringway, providing a highway maintenance service for the Isle of Wight Council from April 2013 to 2038.</p> <p>The use of Body-worn CCTV can provide a number of benefits which include a deterrent to acts of aggression or verbal and physical abuse toward Traffic Management Operatives, in addition to providing evidence to support internal or Police investigations.</p> <p>Body-worn CCTV forms part of a Traffic Management Operatives Personal Protective Equipment and is provided solely for Health and Safety purposes. It will be used in an overt manner and reiterated by Traffic Management Operatives wearing clear identification that it is a CCTV device.</p> <p>This Privacy Impact Assessment relates to the use of body worn cameras (BWC) by the Traffic Management Operatives as listed below in (D) and in the BWC Policy.</p> <p>The integrity of any video data recorded will be considered in accordance with the following legislation and Statutory Guidance:</p> <ul style="list-style-type: none"> • Data Protection Act 1998 • Freedom of Information Act 2000 • Human Rights Act 1998 • Protection of Freedoms Act 2012 • Home Office Surveillance Camera Code of Practice Information • Commissioners Code of Practice.
D	Who will affected by the use of BWC?	<ul style="list-style-type: none"> • Local residents i.e. members of the public • Traffic Management Operatives • Sub-Contractors

E	Purpose + benefits of BWC	<p>Body worn cameras (BWC) will:-</p> <ul style="list-style-type: none"> • Serve as a deterrent to acts of aggression or verbal and physical abuse • Introduce a more imposing recording system to address anti- social behaviour • Keep people safe • Help to protect Operatives at work (for Health and Safety purposes) • Capture images close up, including audio recording • Allow the Operative to maintain the use of his / her hands whilst recording an incident • Provide evidence to support internal investigations (complaints), and prosecution cases • Assist in the investigation of allegations of inappropriate conduct by Operatives
F	BWC impact on Privacy	<ul style="list-style-type: none"> • Persons suspected of committing an offence may be recorded (visual and audio) whilst suspected of or in the process of committing an offence. • There is potential for other persons to be recorded if they are the victim of an offence or in the background when an incident is occurring. • BWC recordings will constitute personal data and its creation, retention and use has been considered under the provisions of the Data Protection Act 1998. Recordings can be requested through subject access requests by following the Council's Access for Personal Information procedure. • The recording of offences and incidents may result in a higher number of members of the public being prosecuted or receiving warnings.
G	Mitigation of BWC impact on Privacy	<p>All Traffic Management Operatives have received training in the use of BWC including:-</p> <ul style="list-style-type: none"> • practical use of equipment • on-street operational guidance i.e. when to commence and cease recording • legal implications of using such equipment.

		<p>BWC will only be activated for recording when Traffic Management Operatives;</p> <ul style="list-style-type: none"> • has an engagement with a member of the public which, in the opinion of the Operative is confrontational and where they believe that they may be subject to physical or verbal abuse • encounter a situation in which they are approached by a member of the public in a manner perceived as aggressive or threatening • observe an offence occurring <p>BWC will be used in an overt manner and each Operative will wear clear identification to indicate that it is a device capable of visual and audio recording. Prior to commencement of any recording Operative will, unless in an emergency situation, give a clear verbal instruction that recording is taking place.</p>
H	Scope of the consultation	<p>Consultation was undertaken in relation to the principle of using Body Worn Cameras and the BWC Policy which sets out:-</p> <ul style="list-style-type: none"> • the purpose of the BWC • who will be using BWC • how BWC will be used • how recordings will be retained • clear guidance on the correct and lawful operational use of BWC • Legislation and Statutory guidance
I	Consultation with Island Roads Staff	<p>Affected Island Roads Operatives have all been consulted and have supported the use of BWC.</p> <p>All Operatives have received training and, having discussed practical scenarios, have contributed suggestions to help to develop the BWC policy and BWC operational guidelines.</p>
J	Consultation with Hampshire & Isle of Wight Constabulary	<p>A consultation was carried out between Island Roads & The Hampshire & Isle of Wight Constabulary. The Police will provide guidance and support when dealing with an incident involving the Traffic Management Operatives.</p>

K	Changes to the policy and logistical operation of BWC - following the officer training and consultation	Initially, BWC recordings were to be uploaded from the devices to a designated PC within the Traffic Management office. Island Roads reviewed the process of uploading BWC recordings from the devices and the storage options thereafter. A more effective method was identified It was considered that the BWC process will be managed by the Island Roads Control Room staff to ensure legislation compliance, continuity and security of the recorded images and the recording equipment.
L	Senior Information Risk Owner (SIRO) aware of any relevant issues?	<p>SIRO noted the following:-</p> <ul style="list-style-type: none"> • Purpose and benefits of BWC • Impact of BWC on privacy • Mitigation factors <ul style="list-style-type: none"> • Risk of capturing images of bystanders in addition to perpetrators • Steps taken to minimise risk re: data upload, storage and retention • Post consultation changes to policy and logistical operation of BWC <p>The above issues together with the policy and operational guidelines have also been considered and agreed by:-</p> <p>Ian Saunders - Traffic Management Officer Keith Gourlay – Construction Manager</p>
M	Date for review	The Privacy Impact Assessment will be reviewed by the Traffic Management relevant Head of Service annually.

16 June 2016

