

Information Management Framework
Data Protection Impact Assessment
London Borough of Barnet

The DPIA is to be undertaken when you have completed a **DPIA Need Checklist** and been assessed by IMT as **requiring a DPIA**.

Your completed **DPIA Need Checklist** must be attached to this DPIA.

You may not have all the information right now, which is fine. This assessment will evolve through your planning, implementation and transfer to business as usual. Please mark a question N/A or nil if you feel it does apply to your project/process.

We encourage you to include/attach **process maps, data flow diagrams, or organisational relationship maps**, as these are a good way to explain a process. These can be hand drawn.

This process is for use of personal data, but be aware that non-personal data implications also need to be managed correctly, with adequate records retention, such as use of address gazetteer data or PSMA licensing, copyright material and IPR. Speak to the Information Management Team for advice.

Name of lead officer completing the assessment **Date**

| | |
|-----------|------------|
| Matt Leng | 05/05/2021 |
|-----------|------------|

Process or Project

1. Description of the planned activity

Service to meet the council's obligations under multiple legislation to identify, manage and reduce anti-social behaviour (ASB).

Patrols, investigations, and enforcement actions against perpetrators are carried out by council and contractor staff, along with victim support where necessary. The overall aim is to reduce illegal and negative behaviour and retain a clean and safe borough.

Barnet Council acts as the prosecuting authority in certain cases of anti-social behaviour.

The council employs contractors to deliver some of these activities, mainly patrols and any action immediately necessary to stop or mitigate ASB. Some of the contracted officers are accredited through the Community Safety Accreditation Scheme (CSAS) as Police Accredited Patrol Officers. This accreditation comes through the Police Reform Act 2002 and gives accredited patrol officers delegated policing powers to confiscate alcohol and tobacco products from minors, enforce Public Space Protection order (PSPO) and the power to acquire names and addresses for relevant offences.

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To enhance visibility, support engagement and enforcement it is proposed that external support is commissioned over the summer months in parks (May-September) from the specifically named contractor, Parkguard.

The approach will follow the Councils adopted ethos of 'Advise, Mediate and Enforce'.

ParkGuard will support the Council's high visibility reassurance and intervention operations in our parks and green spaces providing intelligence in relation to key vulnerable locations identified by the Council.

2. Is the processing novel or has anything similar been undertaken before? Will you be using any innovative technical or organisational solutions, like smart tech?

The process is consistent with other council activities and services used for intelligence gathering, investigation and enforcement.

Body worn video cameras and dashcams are used for some of the work.

3. Do you plan to carry out profiling on a large scale?

No, Assessments are made on a case by case basis.

4. Will you use systematic and extensive profiling or automated decisions to make significant decisions about people? Will you use profiling, automated decision making or special category data to make decisions about someone's access to a service, opportunity or benefit?

No

5. Will you use children's personal data for profiling or automated decisions making; for marketing purposes; or for offering online services directly to them?

No

6. Will you systematically monitor a public place on a large scale *eg CCTV*?

We do not systematically monitor a public place on a large scale, but we make use of CCTV options on a case by case basis (access to footage or targeted) and a RIPA will be sought if targeted environmental enforcement operations are deemed essential.

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Some of the contracted staff wear body worn cameras (BWC). Parkguard is one of the contractors to the Council who will be using body worn cameras on our behalf. This BWC is only activated when a situation meets criteria set by the council.

7. Do you plan to combine, compare or match data from multiple sources *eg fraud prevention*?

Yes. Some aspects of the work, in particular the multi-agency work, involves data sharing and matching from sources including the police. This is done by council officers based partly on data collected by the contractor, but the contractor does not do data matching.

8. Will you process personal data in a way that involves tracking individuals' online or offline location or behaviour *eg vehicle tracking or monitoring an individual's social media*?

We do not process personal data in a way that involves tracking individuals' online or offline location or behaviour *eg vehicle tracking or monitoring an individual's social media* as a matter of routine.

However, there may be occasions where CCTV tracking may be requested via the Police with reference to the Regulation of Investigatory Powers Act 2000.

Body Worn footage captured by the contractor may be provided by the Community Safety team as evidence of anti-social behaviour.

9. Anticipated start date and duration of processing (ongoing if no set end date)

May-Sep 2021 for the pilot project with the contractor.

Purpose & Benefits

10. What are the aims of the processing? What is the intended effect on individuals?

The overall aim is to reduce illegal and negative behaviour and retain a clean and safe borough.

Individuals committing anti-social behaviour will be identified and, if appropriate, receive enforcement action.

Residents will be supported to enjoy a clean and safe borough.

Parkguard officers will refer identified persons for relevant offences to the Community Safety Team (CST) for case management and/or prosecution. The actual processing of the enforcement will come through CST.

11. Why are you planning to undertake this processing? What legislation requires/affects your processing?

The Anti-social Behaviour, Crime and Policing Act 2014 places duties on the council to combat anti-social behaviour. We also have duties for investigating enviro-crime offences such as Littering Offences - Environmental Protection Act 1990 S.87/88 or Fly Tipping Offences - Environmental Protection Act 1990 S.33/33za

To enhance visibility, support engagement and enforcement it is proposed that external support is commissioned over the summer months in parks (May-September)

The approach will follow the Councils adopted ethos of 'Advise, Mediate and Enforce'.

The police reform act 2002 gives the delegated power to Council Officers, and in turn how we authorise them.

12. What are the benefits to the individual, society and the organisation(s) involved?

To ensure that Barnet remains a clean, safe, and healthy place for residents and stakeholders. To reduce the resource required to clean up after environmental crime eg fly tipping.

ASB Processing

Information gained from disclosure methods are used to further investigations into offences under respective legislative. The purpose of investigations and enforcement is to ensure that Barnet remains a safe place for residents, businesses and visitors.

Society benefits from reduced ASB.

Individuals committing ASB are encouraged to stop and may receive enforcement action for their ASB behaviour.

Parkguard project

The primary function is to provide a high visibility presence, gather intelligence and report suspected perpetrators of anti-social behaviour to the Council's Community Safety Team.

13. What geographical area will the processing cover? *(This would generally be Barnet only, but your work may involve pan-London or national projects)*

Barnet only – and a small selection of parks and green spaces.

Data gathered by the contractor will be used by the Community Safety Team for investigation and enforcement, which may involve data sharing where activities cross borough boundaries.

14. Do you plan to consult with any person, group or organisation? Consultation can include a survey, public meetings or committee papers, market research or even a review of previous customer complaints.

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No specific consultation regarding delivery of the service, but activities are driven by the council's objectives, which are fed by resident opinion and Priority 3 of the corporate strategy – to ensure Barnet is clean, safe and well run.

Individuals (data subjects)

15. What types of data subjects are involved? Tick all that apply.

- | | |
|--|---|
| <input type="checkbox"/> Customers or Service users | <input type="checkbox"/> Traders or people subject to inspection |
| <input type="checkbox"/> Service providers / Contractors | <input checked="" type="checkbox"/> People captured on CCTV (BWC) |
| <input checked="" type="checkbox"/> Residents | <input type="checkbox"/> Representative of another organisation |
| <input type="checkbox"/> Complainants | <input type="checkbox"/> Licence and permit holders |
| <input type="checkbox"/> Claimants | <input type="checkbox"/> Employees (previous or current) |
| <input type="checkbox"/> Recipient of benefits | <input type="checkbox"/> Councillors, MPs, elected officials |
| <input type="checkbox"/> Volunteers | <input type="checkbox"/> Professional adviser or consultant (eg doctor or lawyer) |
| <input checked="" type="checkbox"/> Any – the descriptive being any persons who are witnessed involved in ASB. | |

16. Are the data subjects considered vulnerable eg children or domestic abuse victims? What is the council's relationship with the data subject? Is there an imbalance of power, as with employees? How much control will data subjects have?

Data subjects have no choice of having their data processed and the council is in a position of power. Witnesses to ASB may be considered vulnerable, as will those under 18 who may be committing ASB.

17. Expected volume of data subjects *eg number of people or number of records*

Low. While this cannot be fully captured or anticipated the number of records that Barnet Community Safety Team opened from 01/01/2020- 31/12/2020 with investigation files was 1,083. The forthcoming year of 2021 totals are envisioned to be similar. The Parkguard project however will only focus on a specific number of public parks in the borough.

18. How is the individual being informed of the processing (*privacy notices*)? Do you plan to process personal data without providing a privacy notice *eg investigations or covert surveillance*?

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A privacy notice will be uploaded on the council website so that data subjects can find out about the legal basis for processing their information. Individuals will not specifically be notified of processing of their data where this might harm the prevention and detection of crime.

Where body worn cameras are used, there is signage on the device and officers must notify individuals when recording begins.

19. How do you plan to support the Rights of Data Subjects (*eg access to information*)?

A privacy notice will be uploaded on the council website so that data subjects can find out about the legal basis for processing their information. Normal council processes apply when a data subject makes a request although individuals may not be provided with access to data we hold about them where this might harm the prevention and detection of crime.

20. Will your processing prevent individuals from exercising a right, or using a service or contract?

No

Data

21. What type of information will be collected? Tick all that apply.

- | | |
|--|---|
| <input checked="" type="checkbox"/> Name | <input type="checkbox"/> Social services information |
| <input checked="" type="checkbox"/> Address | <input type="checkbox"/> Human Resources information |
| <input checked="" type="checkbox"/> Contact details | <input type="checkbox"/> Employment |
| <input checked="" type="checkbox"/> DOB | <input type="checkbox"/> Education information |
| <input checked="" type="checkbox"/> Equalities information | <input type="checkbox"/> Housing information |
| <input type="checkbox"/> Financial information | <input type="checkbox"/> Family / relationship information |
| <input type="checkbox"/> Property information | <input type="checkbox"/> Information from another local authority |
| <input checked="" type="checkbox"/> Criminal (allegation or prosecution) information | <input checked="" type="checkbox"/> Images in photographs, film or CCTV |
| <input type="checkbox"/> Health / Medical information | <input checked="" type="checkbox"/> Referral / Assessment information |
| <input type="checkbox"/> NHS number | <input type="checkbox"/> Referees |

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Support network

22. Are you processing?

Special category data

Criminal / allegation offence data

Please specify.

Equalities data is collected as this is part of identifying an alleged perpetrator for enforcement action.

Data collected as evidence that someone is committing an offence, and will be used for enforcement purposes which may lead to criminal action.

23. Will you be processing biometric data? Please specify.

no

24. Will you be using the above special category, biometric or criminal data on a large scale? Please specify.

no

25. Is there a risk of physical harm in the event of a security breach eg *fraud investigations or child exploitation*?

Not for the work being carried out by the contractor, although the wider work of the council on ASB and enviro crime has a risk of harm if witness data is lost for example.

26. How is the information being collected? Where are you getting it from?

Mainly from patrols and witnessed activities, including body worn footage, and by collecting information directly from the alleged perpetrators (the data subjects). The patrol officers enter data via secure devices onto a system hosted by the contractor. Footage is gathered through the body worn cameras owned by the contractor.

27. Are you processing personal data for a different purpose than it was originally collected?

no

28. Volume of data *eg number of records?*

Low. While this cannot be fully captured or anticipated the number of records that Barnet Community Safety Team opened from 01/01/2020- 31/12/2020 with investigation files was 1,083. The forthcoming year of 2021 totals are envisioned to be similar. The Parkguard project however will only focus on a specific number of public parks in the borough.

29. How often will you be using the data *eg every day or annually?*

Processed on the day collected

30. How is the information being stored, including backups, paper files in off-site storage, copies etc?

The patrol officers enter data via secure devices onto a system hosted by the contractor. This data from the contractor system is sent through secure email as daily reports to the Community Safety Team, for entry into ECINS. A separate depersonalised incident record for each day is provided to the council by secure email to the Greenspaces Team.

Footage is gathered through the body worn cameras owned by the contractor. Body worn camera recordings shall be held securely on the encrypted device during the shift. At the end of a shift the device is docked and footage uploaded to the contractor system, and the device is wiped. Footage from body worn cameras is sent by ParkGuard to the Barnet Community Safety Team by providing a link in a secure email to a secure site where footage can be viewed and downloaded. Downloaded data will be entered into ECINS, the council's casework system, by the relevant Community Safety Officer.

The council uses the ECINS system from Empowering-communities. This is hosted by Empowering-communities (Empowering Communities provides a secure, GDPR compliant, cloud-based hosting of the system). Information relating to cases are uploaded and stored on ECINS. ECINS is a Casework Software. Access requires a username, password and pin. – The paperwork is scanned to ECINS or uploaded. Originals or paper files when apparent are locked in a secure file at Bristol House, namely the Community Safety Office on Floor 5.

31. How will you ensure good data quality? *eg regular checks or updating processes*

ECINS flags when there may be a duplicate record, and CST officers do a manual check to match new data to existing cases, where relevant. Updating cases is done at an individual case level by council officers who have access to the particular case. This is updated when new case information comes in on an individual basis via case reference number as a log or action (i.e email or telephone call).

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32. What processes are/will be in place for editing or deleting information? We must be able to amend and fully delete personal data from systems.

The secure devices do not hold data on the device, as they are used to enter data directly into the contractor system.

Body worn camera recordings shall be held securely on the encrypted device during the shift. At the end of a shift the device is docked and footage uploaded to the contractor system, and the device is wiped.

When cases within ECINS are redundant or when a period has elapsed for casework progression these cases are archived for the established retention period. These are only viewable to individual investigating officer, team type or working partners based on the case security settings.

33. Are you using contractors/service providers to process the data?

Yes. Parkguard is employed to undertake patrols and gather data, which the contractor transfers to the council via their daily reporting to the Community Safety Team who will upload information to ECINS.

34. How is the information to be transported/transferred (*electronic and paper*)?

The patrol officers enter data via secure devices onto a system hosted by the contractor. This data from the contractor system is sent through secure email as daily reports to the Community Safety Team, for entry into ECINS. A separate depersonalised incident record for each day is provided to the council by secure email to the Greenspaces Team.

Data collected in the contractor system via secure devices is sent through secure email as daily reports to the Community Safety Team, for entry into ECINS. A separate depersonalised incident record for each day is provided to the council by secure email to the Greenspaces Team.

Footage from body worn cameras is Data sent by ParkGuard to the Barnet Community Safety Team by providing a link in a secure email to a secure site where footage can be viewed and downloaded. Downloaded data will be entered into ECINS, the council's casework system, by the relevant Community Safety Officer.

35. How will access to the data be managed and monitored *eg audit trails, logs*? Which officers/roles will have access to the asset?

Contractor patrol officers do not have access to existing data within ECINS. The contractor has access controls on their systems and equipment, and this has been checked through due diligence and covered in contract.

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CST officers are given individual access to cases as part of the council's wider ASB/community safety work. When the case is placed in the ECINS software the case officer can view the case. Additional Officers who wish to view the case must seek permission to view the case with a relevant interest. This audit trail is logged in case history in ECINS and retrievable, showing clearly when the case was last viewed and by whom.

With regard to body worn camera footage an audit trail is conducted via the asset number with the process being governed by the sub-contractor. Only case officers or authorised officers have ability to view such body worn camera footage, via a username and password. Data is encrypted to prevent unauthorised access and to prevent loss or transfer of data by third parties. Data is transferred securely to the council each day. This is a pilot project and the contractor will retain data for the duration of the contract, although this will be a duplicate of what is provided to the council.

Body worn footage will be deleted after 30 days, unless it is identified as needed for a case, when it will be retained for the case period of 10 years.

36. What security measures will be in place?

The local authority; use the secure ECINS System and secure email for sharing information. This prevents unauthorised officers accessing data subject's personal information.

Contractor will have secure access controls on their equipment and systems.

37. Are there are plans to store data outside the UK? Consider hosted sites, disaster recovery and IT support.

There are no plans to store data outside of the UK.

38. Will reports be generated from this information, or statutory returns? If so, will the information be personally identifiable or anonymous?

A separate depersonalised incident record for each day is provided to the council by secure email to the Greenspaces Team.

Any statutory returns will be anonymous in line with obligations.

39. What is the retention period for this information? Consult the council's Retention Schedule. If your processing is not listed, contact recordsmanagement@barnet.gov.uk

Data will be retained for a 10 year period in line with the London Borough of Barnet's Data Retention Policy.

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Body worn footage will be deleted after 30 days unless it is identified as needed for a case, when the 10- year period will apply.

40. What process is/will be in place to implement this retention period?

During the pilot period the CST Manager will do a manual check with the contractor to ensure retention periods are met and data deleted. Data in ECINS will be monitored on an annual basis and cases that have reached their retention period will be deleted. Individual Profiles are archived when the case is deemed no longer active. Information will be removed manually at the end of the retention period.

41. What is the process for managing/transferring/destroying personal data during start-up and close down?

Data management, transferring and destroying of personal data is done securely and agreed before the end of the pilot period.

42. If the organisation/service ceases, what will happen to the information?

The Parkguard Service is being piloted in Barnet between May and September 2021 and continuation of the project will be considered following the pilot. At end of contract, the contractor will securely delete any data they hold.

43. Can data be anonymised or pseudonymised? How will ensure you only use the minimum amount of data required to complete the aim?

Data cannot be anonymised or pseudonymised with information being collected on a case by case basis and unique name.

Anonymised reports will be made to project sponsors.

44. Who do you plan to share information with? Tick all that apply

- | | |
|---|--|
| <input type="checkbox"/> DWP | <input type="checkbox"/> Ofsted |
| <input checked="" type="checkbox"/> Council legal service | <input type="checkbox"/> Voluntary agencies / Third sector |
| <input checked="" type="checkbox"/> Legal representatives | <input checked="" type="checkbox"/> Housing providers |
| <input checked="" type="checkbox"/> Police | <input type="checkbox"/> Expert witnesses |
| <input type="checkbox"/> Insurance companies | <input checked="" type="checkbox"/> Professional regulatory bodies |
| <input checked="" type="checkbox"/> Other local authorities | <input type="checkbox"/> Trade unions |
| <input type="checkbox"/> Home Office | <input type="checkbox"/> Credit reference agencies |

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- | | |
|---|--|
| <input type="checkbox"/> Health agencies | <input type="checkbox"/> UK Border Agency |
| <input checked="" type="checkbox"/> Judicial agencies eg Courts | <input checked="" type="checkbox"/> Prison / Probation services |
| <input checked="" type="checkbox"/> Other council services (specify below) Streetscene Services | <input type="checkbox"/> HMRC |
| <input type="checkbox"/> Specialist organisations (specify below) | <input checked="" type="checkbox"/> Government departments (specify below) In exceptional cases; required by statute. E.G Environment Agency |

45. What information is shared?

Information shared will be were required under legal obligation. This may be inclusive of;

- Name
- Address & contact details
- D.O.B (Necessary to Issue a Fixed Penalty Notice)
- Equalities Information
- Criminal (allegation or prosecution) information
- Images in photographs, film or CCTV/BWC footage
- Referral / Assessment information

Contractor officers will not share data themselves, except if there is a need to call for emergency police/fire/ambulance assistance.

Data sharing will be undertaken by CST officers as part of normal processes.

Risks

46. Are there any known information risks, issues or public concerns? Has there been press interest or court cases relating to this type of processing?

There are no known information risks or public concerns.

47. Any known activities and risks that will have a direct effect on this piece of work?

No known activities or risks are known to have a direct effect on this work.

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Risk Table

| Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. | Likelihood of harm | Severity of harm | Overall risk | Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved |
|---|------------------------------|--------------------------------|---------------------|--|--|-----------------------|------------------|
| | Remote, possible or probable | Minimal, significant or severe | Low, medium or high | | Eliminated reduced accepted | Low medium high | Yes/no |
| <p>Accidental destruction by computer system error</p> <p>Operational, people, financial, reputation, security, regulatory</p> <p>Operational: loss of access to data, potential loss of data, cost of investigation/correction</p> <p>People: delays in processing/payments, excess work to correct</p> <p>Financial: recovery costs, fines for late delivery</p> <p>Reputation: loss of trust in council for reliability</p> <p>Security: loss of data/resilience</p> <p>Regulatory: potential breach of GDPR if systems not in place to recover; potential breach of time-dependent compliance on other law</p> | 2 | 4 | 8 | <p>Business Continuity: Replication, resilient storage systems, backup systems</p> <p>Contractual: SLAs, acceptable use policy</p> <p>Security: RBAC to data</p> | No further controls are practicable; this has been minimised as far as practicable | | |

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|--|---|---|---|--|--|--|--|
| <p>Accidental disclosure by agents of the council or those with whom we share data</p> <p>Operational, people, financial, reputation, security, regulatory</p> <p>Operational: loss of time in investigation/correction/publicity management</p> <p>People: damage to data subjects, potential risks of data abuse, excess work to correct</p> <p>Financial: fines for data exposure, damages for data exposure</p> <p>Reputation: loss of trust in council for security</p> <p>Security: disclosure of data</p> <p>Regulatory: potential breach of GDPR, investigation and action by regulator</p> | 3 | 3 | 9 | <p>Role-based access control: only authorised persons are allowed access</p> <p>Location-based access control: access can only take place from some locations and trusted devices in many cases</p> <p>Staff training and policy: training on data handling mandated for all staff and included in all data sharing agreements/contracts with those with whom we share data, with emphasis on controls of paper information which is most frequent issue</p> <p>Security reporting process: no-blame process to ensure where errors occur these are mitigated"</p> | No further controls are practicable; this has been minimised as far as practicable | | |
| <p>Deliberate disclosure by agents of the council or those with whom we share data</p> <p>Operational, people, financial, reputation, security, regulatory</p> <p>Operational: loss of time in investigation/correction/legal action/publicity management</p> <p>People: damage to data subjects, potential risks of data abuse, excess work to correct</p> | 2 | 3 | 6 | <p>Role-based access control: only authorised persons are allowed access</p> <p>Location-based access control: access can only take place from some locations and trusted devices in many cases</p> <p>Staff training and policy: training on data handling mandated for all staff and included in all data sharing agreements/contracts with those with whom we share data with disciplinary enforcement</p> | No further controls are practicable; this has been minimised as far as practicable | | |

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|---|---|---|---|---|---|--|--|
| <p>Financial: fines for data exposure, damages for data exposure Reputation: loss of trust in council for security Security: disclosure of data Regulatory: potential breach of GDPR , investigation and action by regulator"</p> | | | | <p>Contract controls: mandatory privacy in all contracts with potential penalties Security controls: malware controls, firewalls, protective monitoring</p> | | | |
| <p>Deliberate disclosure by external agents</p> <p>Operational, people, financial, reputation, security, regulatory</p> <p>Operational: loss of time in investigation/correction/legal action/publicity management People: damage to data subjects, potential risks of data abuse, excess work to correct Financial: fines for data exposure, damages for data exposure Reputation: loss of trust in council for security Security: disclosure of data Regulatory: potential breach of GDPR , investigation and action by regulator</p> | 2 | 3 | 6 | <p>Role-based access control: only authorised persons are allowed access Location-based access control: access can only take place from some locations and trusted devices in many cases Security controls: malware controls, firewalls, protective monitoring, system testing"</p> | <p>No further controls are practicable; this has been minimised as far as practicable</p> | | |

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Approval

| | | |
|---|----------------|----------------|
| DPO advice provided by: | Victoria Blyth | Date: 05/05/21 |
| <p>DPO advice:</p> <p>The use of the contractor is part of the wider community safety work of the council. There are some compliance issues with the wider work that need to be rectified. This DPIA covers only the work of the contractor, the duties that the council has that we're choosing to contract a service for, and what happens to the data processed by the contractor when it comes into the wider council work.</p> <p>The following must be complete before the work begins.</p> <ul style="list-style-type: none"> • Identify ownership between Parks and CST – CST will own the DPIA and the legal duties so if Parks owns the contract then both services must keep copies of the DP documentation, and there must be arrangements for the services to collaborate to ensure that the contract is running compliantly, that benefits are being realised, and that any required changes are completed in a timely manner. • Draft a privacy notice that reflects the work in this DPIA • Agree a contract with the contractor, which includes suitable data protection clauses and a completed DP Schedule approved by RIMT and/or HBPL. This must include the description of the activities to be undertaken and agreement of the data controller/processor relationship. • Establish written procedures and suitable training for staff on when and how to use body worn cameras, including instruction on how to identify to data subjects that recording is taking place, and where to direct data subjects if they wish to request access to footage. <p>Actions that are needed that can be done after contract start are:</p> <ul style="list-style-type: none"> • Establish procedures to ensure secure deletion in line with agreed retention periods (this must be in place within 30 days of contract start for the body worn footage). • Establish procedures for what happens to data held by contractor when contract ends. • Completion of the ROPA <p>As this contractor's work is part of wider council community safety work, it is strongly recommended that a combined DPIA for ASB and environmental crime work is completed, which includes the work undertaken by the contractors Parkguard and Kingdom.</p> <p>An ISA isn't needed for this contact to start, but the data processed by the contractor is later shared by the Community Safety Team and an ISA must be in place for this. A pan-London project is looking at ISAs for ASB and environmental crime so this work is in hand.</p> | | |

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|--|--|---|--|--|------------------------------|--|---|---|--|--|
| Documents the service is required to complete/update: <table style="width: 100%; margin-top: 5px;"> <tr> <td><input checked="" type="checkbox"/> Privacy Notice</td> <td><input checked="" type="checkbox"/> ROPA</td> </tr> <tr> <td><input type="checkbox"/> ISA</td> <td><input checked="" type="checkbox"/> Contract / DPA</td> </tr> <tr> <td><input checked="" type="checkbox"/> Process documents</td> <td><input type="checkbox"/> Internet pages/links</td> </tr> <tr> <td><input type="checkbox"/> Other (specify below)</td> <td><input type="checkbox"/> Procedure for data subject requests</td> </tr> </table> | | | <input checked="" type="checkbox"/> Privacy Notice | <input checked="" type="checkbox"/> ROPA | <input type="checkbox"/> ISA | <input checked="" type="checkbox"/> Contract / DPA | <input checked="" type="checkbox"/> Process documents | <input type="checkbox"/> Internet pages/links | <input type="checkbox"/> Other (specify below) | <input type="checkbox"/> Procedure for data subject requests |
| <input checked="" type="checkbox"/> Privacy Notice | <input checked="" type="checkbox"/> ROPA | | | | | | | | | |
| <input type="checkbox"/> ISA | <input checked="" type="checkbox"/> Contract / DPA | | | | | | | | | |
| <input checked="" type="checkbox"/> Process documents | <input type="checkbox"/> Internet pages/links | | | | | | | | | |
| <input type="checkbox"/> Other (specify below) | <input type="checkbox"/> Procedure for data subject requests | | | | | | | | | |
| ICO advice sought | Date requested: | Date received: | | | | | | | | |
| ICO advice: <div style="text-align: center; opacity: 0.3; font-size: 2em; transform: rotate(-45deg); position: absolute; top: 50%; left: 50%;"> Copyright London Borough of Barnet 2019 </div> | | | | | | | | | | |
| SIRO advice sought from: | | Date: | | | | | | | | |
| SIRO views (Reasoning if differs from DPO advice): <div style="text-align: center; opacity: 0.3; font-size: 2em; transform: rotate(-45deg); position: absolute; top: 50%; left: 50%;"> Copyright London Borough of Barnet 2019 </div> | | | | | | | | | | |
| Consultation responses reviewed by: | | If your decision departs from individuals' views, you must explain your reasons | | | | | | | | |
| Comments: <div style="text-align: center; opacity: 0.3; font-size: 2em; transform: rotate(-45deg); position: absolute; top: 50%; left: 50%;"> Copyright London Borough of Barnet 2019 </div> | | | | | | | | | | |
| This DPIA will kept under review by: Cassie Bridger | Date review to take place: 01/06/22 | Date Agreed: 05/06/21 | | | | | | | | |

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