




Data Protection Impact Assessment Screening Template


1. Project Details

Project Title	Body Worn Camera's
Project Reference	454 / 507
Project Lead	Sue Palmer-Hill

2. Privacy Impact Assessment Screening Questions – Full Scale PIA Required?

Question		Answer
Background	<p>1 Project Outline Does the Project have a documented 'project charter', project brief/scope or 'terms of reference'?</p> <p>From this information, provide a short description of the Project is required (as a basis for subsequent assessment).</p>	<p>Body Worn Camera (BWC) technology will be used within inpatient areas at Berrywood and St Mary's hospital. The initiative is specifically being implemented for security and safety purposes; not for clinical observation.</p> <p>Footage will be subject to ongoing evaluation to ascertain impact and will also be used to investigate incidences and for training purposes.</p>

		<p>The devices will be supplied, for the purposes of the initiative by Calla Ltd. Data recorded by the camera devices will be encrypted and uploaded to a cloud-based solution managed by Reveal Media.</p>  <p>02 Project Brief - 454 (v1).docx</p> <p>Following evaluation of a pilot, BWCs will be rolled out to inpatient mental health areas across the trust. The purpose of the processing outlined above will not change.</p>
2	<p>Supporting Evidence Provide details of any reference materials that would assist in the Assessment of this Project.</p>	 <p>RVL1060-DEMS Security Accreditation</p>  <p>cctv-code-of-practice.pdf</p>

Interested Parties	3	<p>Stakeholder Analysis</p> <p>Provide a broad list of any Departments or organisations who may have an interest in, a role to play in delivering, or be affected by the Project. This could include:</p> <ul style="list-style-type: none"> • the Department and individuals that are intended to benefit from the Project • other organisations involved in, or benefiting from, the Project • Departments and individuals that may be affected by it • organisations that provide technology and services to enable it 	<p>NHFT</p> <ul style="list-style-type: none"> • PMVA team • Inpatient MH Wards • Innovation and Research <p>LGSS Calla Ltd</p>
	4	<p>Information Governance Toolkit</p> <ul style="list-style-type: none"> • Please provide information on whether the stakeholders identified have completed an Information Governance Toolkit submission or Data Security & Protection Toolkit submission. 	<p>NHFT are compliant with the IG Toolkit and achieved a score of 90% for version 14.1. The Trust is also in the process of completing the Data Security and Protection Toolkit for 2018/19.</p> <p>No other stakeholders are required to complete the IG Toolkit or equivalent but need to provide security assurance.</p>
Infrastructure	5	<p>Technology</p> <ul style="list-style-type: none"> • Does the project apply new or additional information technologies that affect the way information is accessed, stored, secured, processed. disposed, archived, transferred or impacted in any other way? • Provide detail of the proposed technology and how information will be affected? • Provide the technical specification. 	 <p>RVL1060-DEMS Security Accreditor</p> <p>The project will apply the use of body worn cameras as part of NHFT violence reduction strategy</p>


	<p>The retention period of the footage is as follows:</p> <ul style="list-style-type: none">• Duplicated Footage, accidental activation and footage captured during staff training in camera use will be marked for automatic deletion within 24 hours• Footage captured showing an incident that was managed by non-physical staff interactions (verbal de-escalation) will be marked as evidential and kept for one month from recording date.• Footage captured where staff have physically restrained a service user will be marked as evidential and be stored for 6 months• Footage captured that, in the opinion of the PMVA Team
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		<p>or senior management team, may assist in the investigation of a serious incident investigation (SI as per CRM 002) will be marked as evidential and the incident to be investigated.</p> <p>This retention guidance will be available as part of the trust privacy notice.</p> <p>The cameras record both audio and video footage.</p> <p>Recording will take place in an area that patients would not normally expect.</p> <p>The devices also have the capability of gathering background 3rd party information that could be considered special category as defined by the General Data Protection Regulation 2016/679. This means footage must be appropriately managed when requested as part of a Subject Access Request.</p>
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		As this information will not have been gathered before, suitable privacy notices will be required. As will guidance on sharing information, as NHFT may be required to share this information without consent e.g. for criminal investigation purposes under the Data Protection Act 2018.
6	<p>System Security</p> <ul style="list-style-type: none"> • Does the Project provide security and access control mechanisms to prevent unauthorised access to any Person Identifiable Data recorded? • Who will manage the access controls? • Please provide a Standard Operating Procedure? • How will access be audited and identified issues escalated? • Will data be encrypted and if so to what standard? 	<p>A Standard Operating Procedure will be required after staff have received training in the use of the system.</p> <p>Data is encrypted to AES256 standard at rest by the Reveal Media system and by Microsoft Azure.</p> <p>The Cloud System being used is Microsoft Azure, the data centres for Azure are located in the UK and the EU. The cloud service has been approved by the G-Cloud UK government initiative and meets appropriate ISO standards.</p>
7	Data collection	Video recordings will be labelled when saved with a

	<p>Please provide information explaining how data will be collected and processed, including the following:</p> <ul style="list-style-type: none"> • What data items are being accessed? • How is the management of the data being altered? • What volume of data is affected? How many users? • What identifiers will be recorded? <p>Data processing</p> <ul style="list-style-type: none"> • If personal or sensitive personal data is being used please give details of how will you ensure that confidentiality is maintained. • Will information be pseudonymised during transit? • Does the project involve new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources? If yes, provide detail. • Will data be retained in line with DH recommended timescales? Please provide detail if not. • Please clarify how data will be destroyed at the end of its retention period. 	<p>date and time stamp. Anyone wishing to make a Subject Access Request will need to be aware that they need to know the date and time of the event.</p> <p>4 cameras will be allocated to each ward, with 2 being used at any one time. Docking stations will be based on the wards. Ward staff may wear cameras at all times.</p> <p>Fully identifiable information will be recorded.</p> <p>Cameras will only be used for specific situations and not kept on unnecessarily. This is determined in the relevant Standard Operating Procedure.</p> <p>Information will be encrypted during transit.</p>
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8	<p>Data Mapping</p> <p>If your project will, or may, affect changes to existing data flows, especially where those flows contain confidential, patient identifiable or business sensitive information, then the Trust needs to ensure there are adequate project management arrangements in place as part of your project to identify the transfers, risk assess the transfer methods and consider the sensitivity of the information being transferred.</p> <ul style="list-style-type: none"> • Please complete the data flow mapping spreadsheet and return with this document • Please note, if the project involves transfer of data outside of the EEA, or where third party companies have headquarters' abroad or the potential for information to be hosted abroad additional approval will be required. Will data be processed in this way? 	<p>If the relevant team completes a Data Mapping return, then a flow will need to be added as outgoing.</p>
9	<p>Information Asset Owner</p> <p>The completion of an asset log (also known as inventory) allows the Trust to identify and record all important information assets and allows for the identification of any associated risks and mitigating action to be taken to reduce the risk.</p> <ul style="list-style-type: none"> • Please complete the relevant Information asset owner spreadsheet and return with this documents. <p>Business continuity is a core component of corporate risk management and emergency planning. Its purpose is to counteract or minimise interruptions to an organisation's business activities from the effects of major failures or disruption to its Information Assets (e.g. data, data processing facilities and communications).</p> <ul style="list-style-type: none"> • Please provide evidence of your business continuity arrangements. 	<p>The Reveal media system will need to be added as an Information Asset to the relevant Asset Log.</p>

Third Parties	10	<p>Contracts</p> <ul style="list-style-type: none"> Does the project involve contracts with other organisations or third party companies or sub-contractors? Please provide a copy of all contracts which will be required to include Information Governance clauses. 	 Reveal - Pre-Release Product Loan Agt (UK) A data processing agreement has been signed.
	11	<p>Third party suppliers or sub-contractors</p> <p>All Third Party Suppliers must sign the Third Party Confidentiality agreement (Appendix 1 of the Third party Contracts Pack) as an organisation. All employees or Sub Contractors provided access to NHfT information or infrastructure must sign an individual confidentiality agreement.</p> <ul style="list-style-type: none"> Signed copies should be available to the Information Governance Team on request please indicate that this has been completed. 	No access to Trust premises is provided to Reveal Media, and no remote access will need to be provided.
	12	<p>IG Training</p> <p>All Third Party employees or Sub Contractors given access to NHfT information or infrastructure must complete and pass Information Governance Training prior to accessing the information or infrastructure.</p> <ul style="list-style-type: none"> Certificates must be provided to the Information Governance Team. 	All staff using the cameras or system will need to be compliant with annual IG training requirements.

Confidentiality	13	<p>Privacy Notice/Communications plan</p> <p><i>The DPA requires that information is process fairly and lawfully. Fairness generally requires you to be transparent – clear and open with individuals about how their information will be used, including</i></p> <ul style="list-style-type: none"> ✓ <i>being open and honest about your identity;</i> ✓ <i>tell people how you intend to use any personal data you collect about them (unless this is obvious);</i> ✓ <i>usually handle their personal data only in ways they would reasonably expect; and</i> ✓ <i>above all, not use their information in ways that unjustifiably have a negative effect on them.</i> <ul style="list-style-type: none"> • How is this project being communicated to service users and staff? • Please provide copies of any communication materials to IG for approval prior to distribution 	<p>Notification that the camera is being turned on should be stated unless there is a safety reason not to inform the patient.</p> <p>Privacy notice posters should be displayed in the relevant clinical areas.</p> <p>Privacy notices should include guidance with regards to Subject Access Requests.</p>
	14	<p>Consent</p> <ul style="list-style-type: none"> • Please detail the consent model being used. • Is the processing subject to any other legal / regulatory duties or exemptions? • Please provide detail how consent / dissent will be recorded • Please provide legal basis for processing under the terms of the General Data Protection Regulations, e.g. Article 6 and Article 9 conditions. 	<p>Consent is not being gathered and is not required.</p> <p>The lawful basis for processing special category data will be Article 9 (g) of the GDPR.</p> <p>9 (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific</p>

			<p>measures to safeguard the fundamental rights and the interests of the data subject;</p> <p>Compliance with principle 1 of the DPA in regards to transparency will also be met through the use of the privacy notice.</p> <p>In order to be compliant with the Protection of Freedoms Act 2012, NHFT must consider the necessity of the cameras; this has been achieved through use of the self-assessment tool provided by the Surveillance Camera Commissioner.</p> <div style="text-align: center;">  </div> <p>Self Assessment Tool for Body Worn Video</p>
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Information Governance Recommendation(s)

Please contact the Information Governance Team when the Privacy Impact Assessment template and associated documentation has been completed for review. The Information Governance Team will complete the recommendations section and liaise with the Project Team:

Recommendation(s):

- Any extension to the purpose of processing will need to be reviewed as part of this Data Protection Impact assessment.
- Confirmation that data is being stored in the UK and not the EEA.

This is a 'live' document and will be revisited and updated (if required) at planned intervals until project closedown.

Project Lead Signature: _____ Date: _____

Service Manager Signature: _____ Date: _____

IG Lead Signature: _____ Date: _____

Information Governance Action(s)

Added to IG Audit Action Plan: by _____ on _____