

SUBJECT ACCESS REQUEST (SAR) GUIDANCE CHECKLIST

CHECKLIST FOR DATA CONTROLLER

Considerations for the Data Controller when processing a Subject Access Request:

| CONSIDERATION | REASON | DETAILS |
|---|--|--|
| Verify identity of the Data Subject | Avoid disclosing personal data to the wrong person | <ul style="list-style-type: none"> - Recent photograph - Clothing description - Voice sample |
| Obtain contact details of Data Subject | Understand nature of the request and manage expectations | <ul style="list-style-type: none"> - Purpose of request - Explain disclosure policies - Timescales |
| Locate all BWV data | Data Subject's personal information may appear in more than one BWV recording | <ul style="list-style-type: none"> - Time and date - Location - BWV's user's name & ID - Type of event |
| Impact on policing | Disclosure of data could prejudice security | <ul style="list-style-type: none"> - Prevention & detection of crime - Investigation & prosecution of crime - Public or National security |
| Impact on partner agencies | Agreement on data disclosure for partner agency personnel | <ul style="list-style-type: none"> - Blue light services - Civil enforcement - Health & Community care |
| Impact on third parties | Internal policy for disclosing third party data either with or without consent | <ul style="list-style-type: none"> - Subject's family members - Subject's friends & associates - Any personnel in their workplace |
| Location where recording took place | Increased Likelihood of third party personal data in some circumstances | <ul style="list-style-type: none"> - Hospitals - Schools - Residential Care - Place of worship |
| | Decreased expectation of privacy in some circumstances | <ul style="list-style-type: none"> - Shopping centres - Transport hubs - The High Street |
| Potential circulation of data | Likelihood that redacted video will be further circulated by the Data Subject | <ul style="list-style-type: none"> - Mainstream media - Social media platforms - Open source video platforms |

VISUAL DATA REDACTION CONSIDERATIONS

Visual data that does **not** need to be disclosed to the Data Subject

| TYPE | EXAMPLE |
|---|---|
| Data Subject's indirect identifying features either adjoining or overlapping third party data | <ul style="list-style-type: none"> - Person walking behind Data Subject - Child held close to Data Subject |
| BWV User's indirect identifying features | <ul style="list-style-type: none"> - Jewellery - Scars and tattoos - Badge number |
| Other Blue Light personnel | <ul style="list-style-type: none"> - Firefighter attending an incident - Medica working in a hospital |
| Other partner agencies personnel | <ul style="list-style-type: none"> - Social working attending an incident - Highways officer managing traffic |
| Third party associated with the event | <ul style="list-style-type: none"> - Witness - Victim |
| Third party not associated with the event | <ul style="list-style-type: none"> - Person walking around the incident - Driver in slowing vehicle |
| Third party known to the Data Subject | <ul style="list-style-type: none"> - Member of the family - Neighbour |
| Location information | <ul style="list-style-type: none"> - House and street names - Local landmarks |
| Vehicle identification | <ul style="list-style-type: none"> - Number plates - Company branding |
| General information | <ul style="list-style-type: none"> - Contextual data - Time and date in BWV recording |

VISUAL DATA REDACTION TECHNIQUES

Technical methods that can be applied to redact video data

| TECHNIQUE | ACCEPTABLE APPLICATION | NOTES |
|-------------------------------------|---|---|
| Mask Shape | Fixed shapes such as oblongs, circles and ovals that can be scaled and rotated | Free form shapes or polygons are complex and time consuming for little benefit |
| Mask overlap | Mask can be larger than feature or object so it does not require alteration under small movements | Balance required to ensure no or limited redaction of Data Subject |
| Mask fill (solid) | Use of an opaque colour to completely obscure data | Most secure and consistent method to obscure data |
| Mask fill (blurring & pixilation) | Ensure level is consistent and effective throughout the clip | Greater caution necessary to ensure effective redaction though helps to retain a degree of context to the event |
| Single mask (general) | Best to cover the entire body rather than just the head | It may be possible to indirectly identify third party through unique clothing, jewellery or tattoos |
| Single mask (close to Data Subject) | Some minimal redaction for the Data Subject is allowed to avoid disclosure of other personal data | A common example is people not involved with the incident walking behind the Data Subject |