

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