

Norfolk Fire and Rescue Service

Bowthorpe Training, Development & Assessment Centre DPIA

THE NEED FOR DPIA

The Aim is to capture evidence of a candidate achieving pre-set criteria during an assessment.

We have identified the need for a DPIA because we would like to record students at work during their training and assessment.

At the moment assessors make notes which require them to be in the same room.

THE NATURE OF THE PROCESSING

The information will be gathered during an assessment in a lecture room or on the drill yard at NFRS Training centre.

A camera and microphone will record the assessments.

The individual being assessed will be recorded as well as up to 10 role players (who are sourced internally) and a facilitator will be recorded.

The information will be recorded on a mobile camera.

The information will be stored on the Bowthorpe server. Any data input or deletion will be registered and a log will be kept.

Incident Command and Development Assessors will have access to this information.

In addition an External Verifier from the awarding organisation will be shown footage under supervision for accreditation purposes.

The processing identified is not high risk.

THE SCOPE OF THE PROCESSING

The data is video images with audio recording. The cameras will be portable cameras with a tripod where necessary.

There is no processing of special category or criminal offence data.

The amount of data collected will be approx. 2 x 30 minute assessment sessions per student.

The data will be kept for 2 years.

Over the course of a year there will be approximately 100 students directly affected.

The data capture is only intended to be of students, actors and facilitators.

The training school is located on an industrial estate and is not open to the public.

The area which will be covered by the recording is a 400 square meter drill yard and, separately, a 30 square meter lecture room.

The layout of the external area is such that it is not expected any third parties will be captured accidentally. The yard area is surrounded by fencing and bushes and does not contain any paths through which the public might pass.

The yard is contained beyond the car park and reception areas accessible to visitors.

The lecture room is beyond the publicly accessible areas of the building and the door will usually be closed to prevent accidental capture of anyone outside the room.

THE CONTEXT OF THE PROCESSING

The nature of the relationship with the individuals is that they are students and employees within NFRS who are attending training at the training, assessment and development center for NFRS.

The assessment scenarios involve volunteer actor participants. These roles are usually filled by NFRS employees. The participants will be made aware that recording is to take place.

The student will be able to view the recording.

There is an expectation from the student that we use their data for external verification of their awards.

Students can ask for the cameras to be turned off during their session and for the facilitators to take written notes of their assessments.

The processing does not include children or other vulnerable groups.

There are no prior concerns over this type of processing.

There is no other camera technology in this area.

There are no issues of public concern.

THE PURPOSES OF THE PROCESSING

We want to be able to record the sessions and use them as evidence of a student's performance during assessment.

The intended effect and benefits on individuals is to create an environment where an assessor is not directly present so that students can relax and perform more realistically in an assessment.

It will benefit the centre by creating data which will also satisfy an external verification of assessment decisions.

CONSULTATION WITH RELEVANT STAKEHOLDERS

We will seek individuals' views at the beginning of their training and before the assessment process.

We will consult with IT as to the secure storage of the data.

We will also consult with a data expert on a DPIA and mobile camera policy.

COMPLIANCE AND PROPORTIONALITY MEASURES

The lawful basis for processing is the Fire and Rescue Services Act 2004.

The Act describes clearly that a Fire and Rescue Authority must "make provision for the purpose of –"

- Promoting fire safety
- Fire-fighting
- Rescuing people from road traffic accidents
- Responding to other emergencies as directed by the Secretary of State

We therefore have a clear legal duty to provide a range of responses in our community.

Section 7(2)(b) of the Act says:

"In making provision under subsection (1) a fire and rescue authority must in particular...secure the provision of training for personnel..."

This is a clear legal duty to ensure we have appropriately qualified and trained personnel across a wide range of skills

In order to complete the training and examination process we have external verifiers who need to see the students' performance and the subsequent assessment decisions.

These decisions are currently paper-based and involve the presence of the assessor. This is understood to be inhibiting to students.

In addition, the actual recording is valuable in any situation where a student wants to challenge the decision in the event of not passing assessment.

While there are other ways to record the assessment process, there isn't another way to achieve the exact same outcome. The processing will achieve this purpose

Function creep will be prevented by this being positioned in our quality assurance system. It will be very clear which assessments are to be recorded and which do not require it.

It will also be clearly communicated to all trainers and assessors that cameras are only to be used for these purposes and must not be used for anything inconsistent with that purpose.

Data quality and amount will be minimized.

The information given to individuals will consist of written and verbal explanation of how their data is collected and used prior to their courses.

Portable notices will be used to indicate when recording is in progress and, where practicable, verbal warnings will be given.

RISKS

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
No perceived impact on external third parties as it is anticipated that they will not be in the areas being filmed.	Remote	Minimal	Low
Person is being recorded however the option to not be recorded is always available.	Possible	Minimal	Low

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Someone objects to being recorded	Student can request not to be recorded	Eliminated	Low	Yes

SIGN OFF AND RECORD OUTCOMES

Item	Name/date	Notes
Measures approved by:	Reg 40 Personal Data 22/4/19	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Reg 40 Personal Data 22/4/19	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Reg 40 Personal Data 23/04/2019	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:	Accepted by Reg 40 Personal Data	If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:	Reg 40 Personal Data 15 th July 2019	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	Incident Command Manager, Training and Development Manager	The DPO should also review ongoing compliance with DPIA