

Community Enforcement

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M Mounty

Date: 15 October 2018
Our Reference: 3512734

Dear Sir/Madam

Information Request - 3512734 - Non Encrypted Body Worn Cameras"

I am responding to your request for information, which has been considered under the Freedom of Information Act 2000 (FoIA) and logged as case 3512734.

Your request is as follows:

I recently observed enforcement officers working for Kingdom Services Group Limited using PR5 Body Worn Cameras (not encrypted). To that end, could you answer the following questions?

- 1. Could you confirm that the Enforcement Officers employed by Kingdom Services Group Limited, who are working on behalf of your council as authorised officers are no longer using Pinnacle PR5 Body Worn Cameras, which are not encrypted to protect the Personal Identifiable Information obtained from members of the public during the issuance of a Fixed Penalty Notice?*
- 2. Could you confirm the number of Fixed Penalty Notices issued by Kingdom Services Group Limited using a PR5 Body Worn Cameras since 25th May 2018?*
- 3. Could you break the answer from question 2 down into paid, cancelled, written off and unpaid FPNs?*
- 4. Although, all devices which are being used to record personal identifiable information should be encrypted as per GDPR 2016. If Kingdom Services Group are refusing to upgrade their body-worn cameras to the encrypted model, could you send me a copy of the Data Protection Impact Assessment (DPIA) which clearly shows the risks of having an un-encrypted body worn camera and the measures in place to protect the personal identifiable information of the general public who come*

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into contact with the council's authorised officers working on behalf of Kingdom Services Group Limited?

5. Did you know that the files on a PR5 camera can be accessed from any computer?

6. Did you know that Kingdom officers take these cameras home at the end of each shift; therefore data can be removed and manipulated?

7. Did you know Kingdom have had three separate data breaches in the past 3 months with regards to the loss of PR5 cameras?

8. Did you know that you (the council) are joint controllers under GDPR 2016 and the council would also incur a large fine if a breach is proven?

9. This is the link to a data breach involving Kingdom at Anglesey Council and the council was deemed to be the data controller by ICO even though Kingdom lost the notebook.

<https://www.dailypost.co.uk/news/north-wales-news/kingdom-notebooks-stolen-council-offices-14618190>

If my questions above are not answered fully or the fact Kingdom's officers have issued Fixed Penalty Notices since 25th May 2018 using PR5 cameras is denied. I will submit all of my evidence to the press, Information Commissioners Office and Ombudsman.

Firstly, I have noted that many of the questions you are asking are not for held information; you are asking for comments and opinion. This is outside the scope of the Freedom of Information Act. Secondly, following a search of records, I have established that the remainder of the information you are requesting is not held by Cheshire East Council. It is not recorded information.

Please quote the reference number 3512734 in any future communications.

Please note that an anonymised copy of this response may be published in the Council's Disclosure Log, which is available online at the following address:

https://www.cheshireeast.gov.uk/council_and_democracy/council_information/open-data-and-transparency/freedom_of_information/freedom_of_information.aspx.

If you are not satisfied with the outcome of your request or if you are not happy with the way your request has been handled, you can request an internal review. Internal review requests should be submitted within 20 working days of our response by emailing xxx@xxxxxxxxxxxxx.xxx.xx or in writing to Compliance & Customer Relations Team, Cheshire East Council, 1st Floor, Westfields, c/o Municipal Buildings, Earle Street, Crewe, CW1 2BJ.

If you are not content with the outcome of the internal review, you then have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Tel: 0303 123 1113; Fax: 01625 524510 or <https://ico.org.uk> The Information Commissioner will not normally investigate your case until the Council's internal review process has been completed.

Yours faithfully

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Helen Sweeney
Senior Compliance & Customer Relations Officer
Cheshire East Council

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