

**OFFICE OF THE POLICE AND CRIME COMMISSIONER
FOR HUMBERSIDE
DECISION RECORD**

Decision Record Number: **02/2024**

Title: **Operation Journey - Department for Transport Roads Policing Review Programme**

Executive Summary:

As a result of the East of England and East Midland's Road Safety Summit on 15 September 2023, Humberside PCC was invited by the Department for Transport (DfT) and Association of Police and Crime Commissioners (APCC) to submit a road safety funding bid. The bid was successful and will fund the purchase of dashcams for key road users, body cams for Community Speed Watch co-ordinators, and cycle cams for key cycle user. The overall aim is to make improvements to the current offer around Operation Snap and our local Community Speed Watch scheme.

Humberside OPCC will also be working closely with Lincolnshire OPCC, who are conducting a similar dash cam trial, albeit with a different approach to evaluate options for what works. Humberside OPCC will receive £65,000 towards the project, which will run from January-July 2024, to coincide with the Operation Journey - DfT Roads Policing Review Programme. The DfT will be providing evaluation of the project through a third-party provider.

Decision of the PCC:

1. Accept the Operation Journey funding for £65,000 from the Department for Transport.
2. Purchase of dash cams from Nextbase at an agreed price.
3. Develop an approach to ensure dash cams are distributed to the suitable road users who live within the Humberside Police area.
4. Purchase of body cams for Community Speed Watch and cycle cams at an agreed price (provider to be determined).
5. Work with R-evolution to determine the best approach to distributing and monitoring usage of cycle cams.
6. Report back to the Department for Transport as per the agreed schedule.

Background Report: Open

Police and Crime Commissioner for Humberside

I confirm I have considered whether I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with my code of conduct.

Any such interests are recorded below.

The above decision has my approval.

Signature



Date 24/01/2024

POLICE AND CRIME COMMISSIONER

FOR HUMBERSIDE

SUBMISSION FOR: DECISION

OPEN

Title: Operation Journey - Department for Transport Roads Policing Review Programme

Date: 17 January 2024

1. Executive Summary

As a result of the East of England and East Midland's Road Safety Summit on 15 September 2023, Humberside PCC was invited by the Department for Transport (DfT) and Association of Police and Crime Commissioners (APCC) to submit a road safety funding bid. The bid was successful and will fund the purchase of dashcams for key road users, body cams for Community Speed Watch co-ordinators, and cycle cams for key cycle user. The overall aim is to make improvements to the current offer around Operation Snap and our local Community Speed Watch scheme.

Humberside OPCC will also be working closely with Lincolnshire OPCC, who are conducting a similar dash cam trial, albeit with a different approach to evaluate options for what works.

Humberside OPCC will receive £65,000 towards the project, which will run from January-July 2024, to coincide with the Operation Journey - DfT Roads Policing Review Programme. The DfT will be providing evaluation of the project through a third-party provider.

2. Recommendation(s)

Agree to:

1. Accept the Operation Journey funding for £65,000 from the Department for Transport.
2. Purchase of dash cams from Nextbase Limited at an agreed price.
3. Develop an approach to ensure dash cams are distributed to the suitable road users who live within the Humberside Police area.
4. Purchase of body cams for Community Speed Watch and cycle cams at an agreed price (provider to be determined).
5. Work with R-evolution to determine the best approach to distributing and monitoring usage of cycle cams.
6. Report back to the Department for Transport as per the agreed schedule.

3. Background

Operation Snap:

The aim is to expand our Operation Snap approach.

a) Dash cams:

We will offer our key road users the possibility of providing free-of-charge to them a plug and play dashcam. There will be an application process to ensure we focus on the most dangerous roads in our policing area, with a focus also on those that cross over our boundaries, especially with Lincolnshire as they are also piloting a similar approach. The focus will be on key road users who regularly use the road network and are willing to download dashcam footage on a regular basis where they identify inappropriate driving behaviour by other road users. This approach will be developed first as part of our programme of implementation.

b) Cycle cams:

We will offer vulnerable cyclists the possibility of providing free-of-charge to them a cycle camera. There will similarly be an application process to ensure we focus on the most dangerous roads for cyclists in our policing area. We have large numbers of vulnerable road users who contact our office seeking assistance. Cycling groups can be highly vocal, and with good reason when footage provided by them to Operation Snap is viewed. The focus will be on vulnerable cyclists, and we are holding discussions with R-evolution around how we can potentially develop a scheme with those who regularly use the road network and are willing to download cycle cam footage on a regular basis where they identify inappropriate behaviour by other road users.

The objective of both proposals (a) and (b) is to increase the amount of video footage sent to Operation Snap showing inappropriate driving and cycling behaviour and raise convictions.

c) Community Speed Watch:

The aim is to build on our existing successful Community Speed Watch (CSW) approach, taking it to the next level in terms of safety and encouragement of responsible road use in our villages.

There will be body cams for our volunteer groups in each village (up to 50 villages), which is something they constantly ask for. The focus will be on increasing participation through making the volunteers feel and be safer.

The body cams would be distributed by our CSW Co-ordinator, who will provide the necessary training when rolling out the cameras in the coming months via local co-ordinators. The body cams would be stored with existing CSW equipment via local co-ordinators and they would be expected to delete footage if unused (timelines and policy will be provided through training). The focus will be on informing and encouraging responsible road use.

In respect of camera purchase, for the dash cams, we requested three quotes from key suppliers that meet the required standards to enable Operation Snap to analyse. Only one responded with an interest in working with us, covering not just the purchase, but also support for warranties for individuals, SD cards, and promotion of the scheme through themselves and suppliers. For the cycle and CSW body cams, we will identify suitable suppliers when we get to a point of developing them further in the coming weeks and months.

There will be some element of evaluation – we will be providing two-weekly data in the period of implementation and working with the DfT evaluation team (who will be using a third-party provider) to ensure understanding and sharing of good practice nationally.

The PCC will also provide an element of funding and benefit in kind towards this proposal, through the provision of promotional materials, training, publicity and other means.

4. Options

- 1) Purchase dash cams, body cams, and cycle cams for Operation Journey utilising the funding provided by the Department for Transport, and work with them to ensure implementation and evaluation in the agreed timescales.
- 2) Continue with our existing Operation Snap and Community Speed Watch approaches, without a pilot scheme.

5. Financial Implications

Funding will be provided through the Department for Transport up to £65,000. Any additional requirement will need to come from existing resources and the PCC would potentially need to agree to an element of funding. The funding must be spent between late January 2024 and the end of July 2024.

The number of camera submissions will be closely monitored in order to ensure that the processing team in Humberside Police are able to meet any surge in demand from dash cam footage. This could entail a discussion around short-term resource needs, but will be considered in the event it is required.

The PCC will also provide an element of in-kind contribution to this proposal, through promotional materials, training, publicity and other means.

6. Legal Implications

The liability for cameras has been considered and ownership and warranty of dashcams, cycle cams, and bodycams would pass to the users (or Parish Council in the case of CSW), with installation by them through a plug and play approach. Other legal issues surrounding Operation Journey are covered by the DfT and if any issues arise during the course of the project, they will be flagged at regular update meetings held between the organisations involved.

7. Driver for Change/Contribution to Delivery of the Police and Crime Plan

The aim is to ensure further development of Operation Snap and Community Speed Watch through use of technology and involvement of the public. It fits locally with the Police and Crime Plan commitments to support volunteering, establish communication routes with communities, and ensure safer roads for everyone.

It also supports the DfT in their Operation Journey – Roads Policing Review Programme and helping to determine and influence national policy. There will be some element of evaluation – we would provide two-weekly data in the period of implementation and work with the DfT evaluation team to ensure understanding and good practice.

8. Equalities Implications

There are no specific implications. The use of My Community Alert for the application process will allow us to view applicants and ensure we cover the areas where there is greatest demand and benefit to local people. Working with others including R-evolution will allow us to also ensure the most vulnerable road users will be informed and involved.

9. Consultation

Consultation has been undertaken with the DfT, Lincolnshire OPCC, R-evolution and subject matter experts at Humberside Police – CSW and Operation Snap in particular. We have also informed Safer Roads Humber of the project. As part of the implementation, we will be consulting through the application process to ensure we focus on the relevant road users. During implementation, we will also be consulting as part of the project requirement.

10. Media information

Communications Officers from both OPCC Humberside and OPCC Lincolnshire have been involved in the process from the commencement of discussions with the Department for Transport. In addition, Nextbase has also offered to undertake media work as part of the implementation.

11. Background documents

Awaiting funding documents from Department for Transport (DfT).

12. Publication

Open

13. DPIA

The issues identified as part of this proposal have been discussed with the OPCC DPO. The application process for dash cams has been agreed with the DPO to ensure the correct flow is followed. A full DPIA has been prepared (attached at Appendix 1).

Data protection issues are also covered through the Operation Snap process.

In respect of ensuring correct use of cameras and deletion of footage for CSW, we will make clear that the parish councils and co-ordinators will manage the equipment and the CSW co-ordinator will develop a suitable RRD (Review Retain Delete).

DPIA – Operation Journey



Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The project Operation Journey aims to prevent and detect offending on our roads by issuing dashcams to drivers and encouraging them to share footage of road use with Operation Snap – the national initiative for dash cam uploads.

It will involve the processing of the personal data of the person being issued the cam, plus the personal data Vehicle Registration Marks and potentially images of other road users.

Despite the limited involvement of the OPCC's data processing in the wider context, a DPIA has been completed due to the complexity of the processing, and the fact that other roads users' personal data will be captured by the people who sign up to the programme.

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

Before looking at the processing by the OPCC it is beneficial to first consider the overall data flows of the project.

The OPCC's involvement as a data controller is at the following points of the journey:

- To issue dashcams to members of the public
- To contact those members of the public to review their experience of the scheme (or to pass to a third party to do so)

The OPCC will only record and process sufficient data for these specific objectives. It will not record or process and criminal offence data – that will be between the data subject and the Op Snap programme.

The data processing outside of these touch points will be done by the data subjects and Operation Snap.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The data processed by the OPCC will be restricted to:

Name

Address

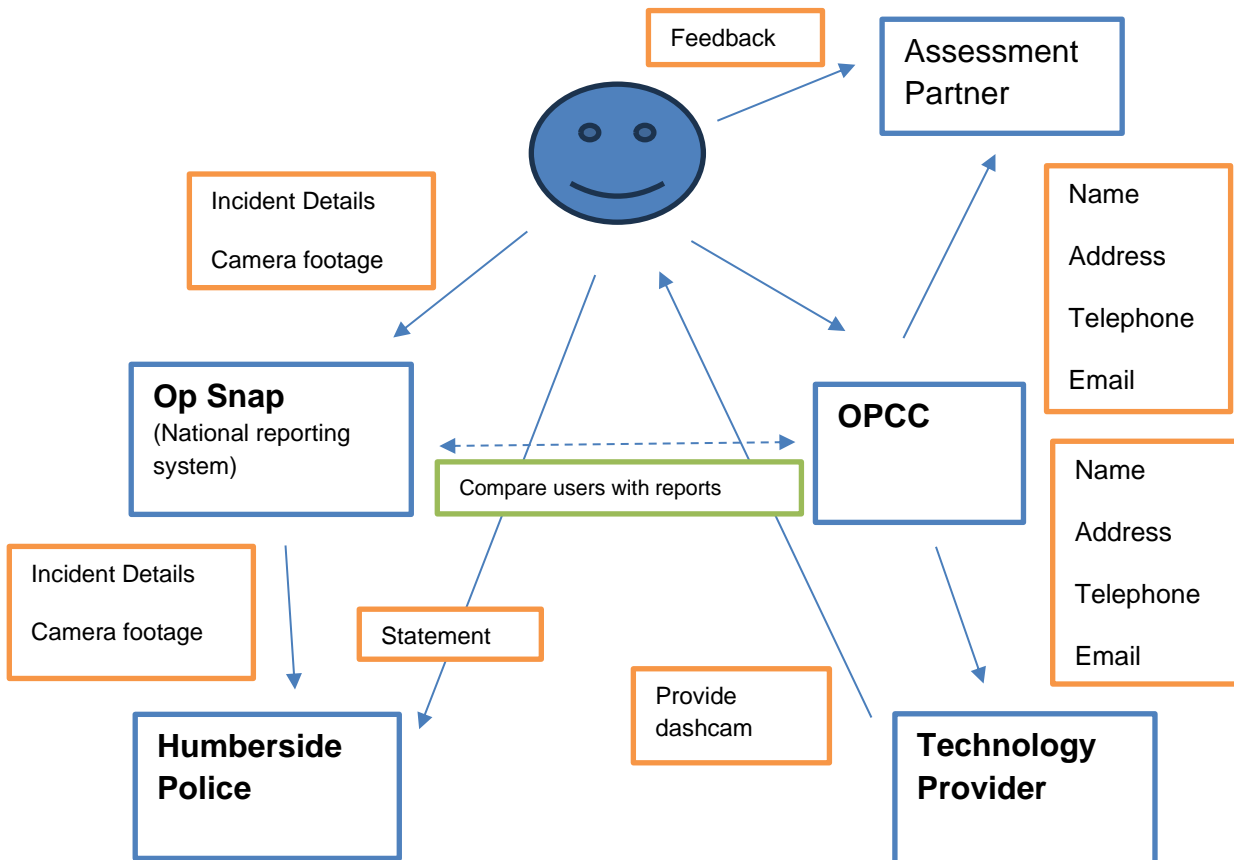
Phone Number

Email Address

Data will be retained by the OPCC for the duration of the programme (anticipated 2 years) and then reviewed for disposal.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The individuals whose data is processed by the OPCC will be members of the public. They will provide only basic contact details and these details will mainly be used to make contact with them.



Their personal data will be shared with the Dash cam supplier and a Privacy Notice will be issued to the individuals that makes this sharing clear.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The ultimate aim is to prevent and detect road crime. This is in the public interest. The purposes of the OPCC's data processing is to connect interested parties with the scheme's administrators so they can obtain their dash cam.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The OPCC should consider a communication strategy to ensure that the public are aware of the programme and why it is being put in place. Consultation should take place with other delivery partners to ensure consistency of messaging and that data protection has been considered by design and default as the OPCC could carry some reputational risk if there are any data issues of breaches amongst the other partners.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The lawful basis for processing is Public Task. The OPCC has a responsibility to link the public with the police in the interests of public confidence and crime prevention and will be funding the dash cams.

Another way of achieving the same outcome without the OPCC processing personal data would be by asking the Police to lead on the project, providing them with the funding (or the devices) and using its powers for the police to report back on progress.

Step 5: Identify and assess 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
<p>Data subjects are unaware of the further processing of their personal data by the police or Op Crash</p> <p>Other road users object to their data being collected by the data subjects</p>	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
	Probable	Minimal	Medium
	Probable	Significant to Severe	Medium

Step 6: Identify measures to reduce risk

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
<p>Data subjects are unaware of the further processing of their personal data by the police or Op Crash</p> <p>Other road users object to their data being collected by the data subjects</p>	<p>Ensure privacy notice from OPCC covers all onward processing or ensure further data controllers issue Privacy Notices or consider whether another partner would be better placed to capture this initial data</p>	Eliminated reduced accepted	Low medium high	Yes/no
	<p>This will not be directly controlled by the OPCC but this office risks reputational harm as a result. Due diligence to take place with other data processors to ensure a suitable regime is in place.</p>	Reduced/ reduced/ Eliminated	Low	Yes
		Accepted	Medium	Yes

Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	Paul Wainwright, Head of Assurance and Statutory Duties, OPCC Humberside	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Paul Wainwright, Head of Assurance and Statutory Duties, OPCC Humberside	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Mike Richmond 15/1/24	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice:</p> <p>As a matter of due diligence, it is recommended that the OPCC ensures that the police/operation Snap/Journey issues a separate privacy notice within 30 days of receiving their details from us to detail their data processing activity.</p> <p>Furthermore, the OPCC will wish to satisfy itself that processing by other data controllers meets the requirements of the Data Protection Act, including processing under Part 3 (Law Enforcement).</p> <p>The application form must either contain sufficient detail to serve as a privacy notice or be supplemented by a suitable privacy notice. The decision-making process for why the OPCC is capturing initial data to share with police and other partners (rather than them doing so) should be documented.</p> <p>Application forms must be subject to a retention period and a process put in place to destroy personal data at the end of the operation.</p>		
DPO advice accepted or overruled by:	Paul Wainwright, Head of Assurance and Statutory Duties, OPCC Humberside	If overruled, you must explain your reasons
Comments: Accepted.		
Consultation responses reviewed by:	Paul Wainwright, Head of Assurance and Statutory Duties, OPCC Humberside	If your decision departs from individuals' views, you must explain your reasons
Comments: No comments.		
This DPIA will kept under review by:	Paul Wainwright, Head of Assurance and Statutory Duties, OPCC Humberside	The DPO should also review ongoing compliance with DPIA