



LEICESTERSHIRE
FIRE and RESCUE SERVICE



FAIR PROCESSING AND PRIVACY NOTICE

360 Virtual Reality Camera

Who we are and our contact details

Leicestershire Fire and Rescue Service (LFRS) [us/we/our] are a Public Authority and the Data Controller for determining the purpose and means of processing your personal data. Personal data means any information about a living individual who could be identified. You can contact us:

Address:

The Data Protection Officer,
Information Governance Department,
Leicestershire Fire and Rescue Service Headquarters,
12, Geoff Monk Way,
Birstall,
Leicester

LE4 3BU

Email: **dpo@leics-fire.gov.uk**

Telephone: 0116 210 5555

Or via our **Social Media Channels – See our Website Homepage for links:** [Data Protection, Your Privacy & Website Cookies \(leics-fire.gov.uk\)](#)

Why we collect your personal data

This Fair Processing and Privacy Notice relates to the personal data that Leicestershire Fire and Rescue Service (LFRS) processes about you in relation to 360 Virtual Reality Camera's (VRC's) used in the Service areas of Fire Investigation, Road Safety, Fire Protection and Training and Development. Processing means the collection, recording, storage, use, sharing, archiving and deletion of your personal data.

Images captured using VRC's are treated as personal data by LFRS as we consider them to be a form of video recording known as a 'moving image'.

The categories of individuals

Employees

Temporary employees including Intern and Agency

Apprentices

Partner Authorities/Organisations

Suppliers / Service Providers

Community

The personal data we collect

All VRC's and data collection are overseen by our Departmental Group Managers within Fire Protection, Operational Risk, Safer Communities and Safeguarding, and Training and Development who are the Information Asset Owners. Data security is managed by the Service ICT Department. Data protection is monitored by our Data Protection Officer (DPO), they are responsible for carrying out compliance audits and ensuring we practice Fair, Lawful and Transparent personal data processing.

We collect video images, audio and still images using visible (overt) non-permanent hand held or tripod mounted cameras. Recording is active when the device is turned on. Recording stops when the device is turned off. There may be a small lag after the device is turned off where it continues to record, it will then deactivate automatically.

We will apply cordons to control access when filming is taking place however any person who is within the range of a VRC may be captured and their video images, audio or still images stored on the devices. That includes those who have a purpose or right to be within the vicinity and those who do not.

The VRC operator will make people in the vicinity aware they are recording.

Our lawful reasons for processing your personal data

LFRS has due regard to:

- UK General Data Protection Regulations (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998 – Article 8
- Freedom of Information Act 2000

Our personal data processing will be proportionate, legitimate, and necessary to the situation. This includes where filming takes place in non-commercial and residential properties affected by Article 8 of the Human Rights Act 1998.

The lawful basis for processing are set out in the UK GDPR. At least one of these must apply whenever the Service is processing your personal data. For our use of VRC we are applying:

UK GDPR Article 6 1(f)

Legitimate Interests: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

We are not relying on your consent (permission) to collect and process your personal information as participation in any recording where a person is identifiable is by your choice and you have an option to be edited out of any final production copy of VR videos, and therefore our legitimate interest is

applied with a balance to your individual rights and freedoms as a personal data subject. We accept that there may be some collateral intrusion as people in the background are filmed, if this occurs we will limit that intrusion, where we can protect identity and any person who believes they have been filmed is entitled to contact us and exercise their individual right of erasure.

We will not process your Special Category Personal Data (Sensitive personal data) using VRC's.

How we use the personal data we collect about you

The primary purpose of capturing moving and still images and audio, is to:

- Capture moving images (video) from real life scenes in order to produce Virtual Reality training material for use by our staff.

We may also use the captured information to:

- Assist with the debrief process of operational incidents.
- Assist with the training of Fire and Rescue Service staff from other Services.
- Assist with the training of our multi-agency partners and other organisations.
- Assist with the education of communities in accordance with our purpose of Safer People Safer Places.
- Enable evidence to be captured and utilised where appropriate as part of any asset strategy adopted by LFRS such as future upgrades of VRC's.

Who we share this information with and why

Only the people who need to see your personal data, will be allowed access to it as well as ICT staff managing the security and storage.

We may share your personal data with third parties (who are not employed by us) when we need to and in accordance with the purposes published in this Notice, this includes public viewing for Community information and

training events. We will not share your personal data with persons outside of LFRS for any other purpose without first obtaining your consent or with legitimate interest unless we are legally required to do so.

Some of the videos are made widely available on the Immersive Community Education (ICE) Hub which is a platform for sharing virtual reality experiences and 360 film for the benefit of road and community safety. Access to the videos requires membership of the platform.

We will not sell the video's for commercial use.

How we store your personal data and how long we keep it

Local storage of data in the VRC's is limited to the memory size of the onboard storage media. All previously captured images will be removed from the device drive following a data download to secure laptop computers and data servers located at our Service Headquarters, or on a rolling cycle as the on-board memory becomes full when it will be overwritten. Specialist software installed on our secured laptop computers is required to view the video, audio and still images.

VRC video images are kept for as long as we need them to meet our purpose of processing, they are then permanently deleted, usually this is until they are no longer required for training purposes or replaced with a refreshed version of the VR training video. We may retain the images for a longer period if we have legal basis or other legitimate reason to do so.

Storage devices are secured with access limited to those who have fair and lawful purpose to do so, this is closely regulated by us.

Your individual rights

In general, you have the right to request that LFRS:

- Provides you with details of your personal data held, gives access to you and where appropriate provides you with a copy of your personal information

- Corrects any errors in your personal data we find during our business processes, or are informed of and restrict processing of your personal data until completed
- Considers your objection to the processing of your personal data and depending upon the service and legal basis, stops all or some of that processing. "Processing" means the collecting, storing, amending, disclosing, sharing, archiving and destruction of your data
- Erases your personal information, depending on the service and legal basis deletes all or some of your personal data
- Withdraw your consent for us to further process your personal data, if consent is used by us as the legal basis for the service
- Informs you any of automated decision making, including profiling for the service (Note: Please be advised we do not currently use automated decision making)

Where possible we will try to meet your request, but we may need to retain or process information to comply with a legal duty or our policies and procedures.

Data Protection information, requests and concerns

If you would like to exercise your individual rights or discuss anything in this Privacy Notice, please contact our Data Protection Officer (DPO) – See top of page 1.

If you have concerns about the use of your personal data we encourage you first to contact our DPO as concerns can often be resolved very quickly. If you remain concerned then the Information Commissioners Office is an independent body set up to uphold information rights in the UK. They can be contacted through their website: www.ico.org.uk or their helpline on 0303 123 1113, or in writing to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF

For more information about your rights: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protectionregulation-gdpr/individualrights/>

To complain to the Information Commissioner's Office:
<https://ico.org.uk/concerns/>

Review

Revised October 2023.

Next review October 2024.