

Response to Request for Information

Reference FOI 002699
Date 28 August 2018

Kingdom Services Group

Request:

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?
[Kingdom confirm that PR5 are currently being used on site, footage on the cameras are downloaded onto our secure server at the end of shift by the data controller. The data controller ensures that at the end of shift that all PR5 cameras contain no footage.](#)
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?
[A total of 1461 FPNs have been issued since the 25 May 2018 using PR5 cameras.](#)
3. Could you break the answer from question 2 down into paid, cancelled, written off and unpaid FPNs?
[774 paid, 29 cancelled, 54 written off, 604 unpaid](#)
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 into contact with the council's authorised officers working on behalf of Kingdom Services Group Limited?
[We are seeking further clarification in regards to body worn cameras needed to be encrypted, as for the Data Privacy Impact Assessment's we approach in line with the respective responsibilities for both the data controllers and processors.](#)

5. Did you know that the files on a PR5 camera can be accessed from any computer?
No
6. Did you know that Kingdom officers take these cameras home at the end of each shift, therefore data can be removed and manipulated?
Kingdom equipment is stored away at the end of shift no equipment is taken home.
7. Did you know Kingdom have had three separate data breaches in the past 3 months with regards to the loss of PR5 cameras?
Whilst a question can be a valid request for information under the Act any answers to questions will only relate to information that the Council holds in recorded form. In this instance your question does not describe any distinguishing characteristics of information and is therefore not a valid request under Section 8(1)(c) of the Act. If you wish to reframe your question to describe the recorded information you require we will be happy to consider your revised request.
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?
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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://emea01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.dailypost.co.uk%2Fnews%2Fnorth-wales-news%2Fkingdom-notebooks-stolen-council-offices-14618190&data=02%7C01%7Cfoi%40wolverhampton.gov.uk%7C57c0ff399203437a087908d60c28e6a3%7C07ebc6c370744387a625b9d918ba4a97%7C0%7C0%7C636709767146465662&sdata=Rg1tBf5Ca2A4ILN6IM3EKvSAkl%2BmRwQYvSVfB%2FD9CrI%3D&reserved=0>

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Kingdom Services Group Limited work on behalf of the council providing Environmental Enforcement. Could you confirm the following please:

1. Could you confirm the job title of each officer working on behalf of Kingdom Services group, who are authorised by the council to issue Fixed Penalty Notices.
[Environmental Enforcement Officer](#)
2. Could you confirm the hours worked and quantity of fixed penalty notices issued by each Kingdom officer, who is authorised by the council to issue Fixed Penalty Notices. Could you break this information down into calendar months for 2018 (Jan, Feb, Mar, Apr, May, Jun, Jul, Aug)? Please use the following as an example or you can supply the details in your own format if its easier.

January Team Leader 160 hours 88 FPNs

January Enforcement officer 170 hours 60 FPNs
January Enforcement officer 182 hours 72 FPNs

[Following reasonable enquiries, it has been established that the Council does not hold the above requested information.](#)

[Consequently, we are unable to provide any information relating to the above, and are informing you as required by Section 1\(1\) \(a\) of the Freedom of Information Act 2000 \("The Act"\), that states:](#)

["Any person making a request for information to a public authority is entitled to be informed in writing by the public authority whether it holds information of the description specified in the request".](#)

[To advise and assist you under Section 16 of the FOIA, you need to re-direct your enquiry to the relevant company. For reference we have provided their information below:](#)

[Please contact Kingdom Services Group Limited directly for the information requested, hours worked are not recorded on site.](#)