



Assessment Details

Name Art Installation

Approver Rena Gertz

Respondent Nicola Osborne, Nic Sandiland (External), Miriam Walsh

Stage Completed

Date Completed 10/06/2024 13:26

Result Approved

Assessment Questions

1 Description of Activity

1.1 Which College business unit is the DPIA for?

Please indicate which business unit you are conducting the DPIA for.

Response

College of Arts, Humanities & Social Sciences

Justification

None

1.2 Which School is the DPIA for?

Response

Edinburgh College of Art

Justification

None

1.5 Activity Name

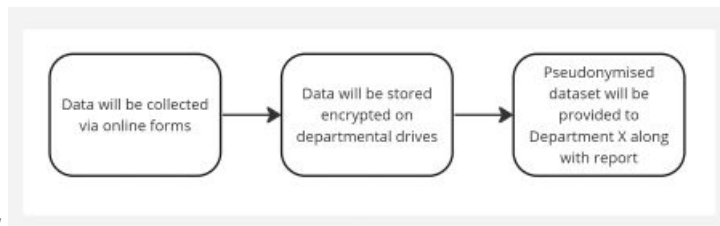
Response

An Obscure Camera

1.6 Activity Outline

Explain broadly the scope of the activity, particularly what the activity aims to achieve (e.g. the benefits to the University, or to data subjects etc.) and what type of data processing it involves.

To do so, you should describe the collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows – where you are getting the data from, where it will be stored and where it could be transferred to. You should also say how many individuals are likely to be affected by the project.



e.g.

Response

The project involves a live camera pointed at the street outside of Inspace Gallery, part of the Institute for Design Informatics, based at the University of Edinburgh. Inspace is located at 1 Crichton St, Newington, Edinburgh EH8 9AB and the camera will be placed in the window of Inspace facing Potterrow. **Video from this camera will be streamed live to be projected on a wall inside of the building. There will be no recording of the live stream stored on disc. Documentation data only will be stored securely on University of Edinburgh SharePoint.**

The installation overlays an opaque video layer over the top of the live feed so that the image is almost entirely masked and invisible to anyone in the space. The opaque layer is perforated by a number of 'portholes' which allow the underlying image of the street scene to show through at various points on the projection.

Participants within the installation (at this point in time the researcher and invited students/researchers from IDI community), can move around the space affecting where these 'portholes' appear on the projection: eg, if one participant walks to the left, their corresponding porthole will also move to the left. In this way, participants can choose to reveal any part of the projection they find interesting. They can also choose to 'follow' anything or anyone depicted in the video. The aim of the research is to explore the choices made by surveillance technology by asking the participant to reflect on what they choose to follow and what it feels like to do so.

Photographic and/or video documentation of this prototype and work in progress will be captured. Whenever documentation is taking place we will display notices within the Inspace gallery to inform any visitors to the space (attending/participating in the work in progress) that their image may be captured. We will seek explicit permission for use of images if/where appropriate. For those whose participation is through them being streamed in from the cameras facing the street there will also be signage notifying members of the public that images are being taken. Additionally any documentation will be done, as much as possible, in a way that obscures any personal identifiable characteristics of individuals within the field of capture.

Data Collection and Storage:

Photographic and/or video documentation will be collected by University of Edinburgh Production Team only and visual data will be stored on the Institute for Design Informatics SharePoint Drive only. Documentation may subsequently be published as part of the artist and/or Inspace/Institute for Design Informatics' portfolios and communication channels. This will only take place following review and editing of the content to ensure all individuals are either anonymised, pseudonymised and/or restricted to those who have given explicit permission for images to be used (e.g. staff and students from the Institute participating in the development of the work).

Data Pseudonymisation:

In the case that any documentation captured includes personal identifiable characteristics of individuals, photographs and footage will be appropriately anonymised and/or pseudonymised using appropriate post production tools (e.g. blurring of faces).

1.7 Why is the processing necessary?

Why is it necessary to process the data you have described in the Activity Outline?

This and the next question are most important as they form the justification for your activity being proportional. You will need to argue the benefits of your plans, why it is important and why the planned activities are necessary to achieve these benefits.

Important: If the DPIA is for the purchase of software, an app or similar and there is already other similar software or an app, you **must** justify why it's not fit for your purpose.

Response

The processing of personal image data is a fundamental aspect of the installation. It is about viewer interaction with a live video feed and cannot be achieved with the same artistic or practice based research objectives in any other way. However, this processing of data is not obscured in any way as it is our intent to engage those participating/viewing the work in reflective consideration of surveillance and personal data. The activity itself is designed to encourage members of the public to take a more critical perspective on the use and processing of their data in public contexts, potentially providing significant benefits to their ongoing understanding and engagement with other forms of public data capture. We are being transparent in interpretation materials and communication around the project to ensure this purpose and intent is clear to anyone whose data may be collected and processing in its realisation.

1.8 How will the activity help you achieve your objective(s)?

Describe how what you plan to do will help you achieve your purpose - describe how you ensure that the personal data is proportionate to the objective. Is there a less intrusive way of achieving your aim?

Response

As noted above (question 1.6), the research aims to explore the choices made by automated surveillance technology by asking the participant to reflect on what they choose to follow and what it *feels* like to do so. As further noted in question 1.7 we are being transparent and highly intentional in our use of data and processing to achieve this objective of opening up a dialogue and increased public criticality around surveillance and the capture of data in public spaces.

In terms of proportionality we believe that our use and processing of data is appropriate to the objectives. Additionally we would note that:

1. There is no difference between the live feed in the proposed work and any other public-view webcams – except that in this activity we will be making efforts to ensure all participants are aware of what is taking place and being encouraged to critically engage with the process and implications of data capture
2. The installation emulates already existing public viewing technologies but, unlike these ubiquitous systems, does not take data or analyse what it sees: this is left to the participants to reflect on.

At the heart of this work is a sense of liveness and liveliness, as well as embodiment, this work also builds on historical examples of research and creative practice exploring the notion of following, public space, the everyday and the camera's gaze. We do not, therefore, believe there is a less intrusive way to achieve our objectives.

1.9 List of Stakeholders - Activity or Proposal Stakeholders

This should cover all individuals or groups involved in the activity, the so-called activity or proposal stakeholders. Examples are School/College/Department planning to use the activity; project officers; IS, if involved; or external organisations such as software providers. At this stage you want to have as broad a list of groups as possible - these are the people with the knowledge you need who will help you answer the questions in this DPIA.

Note: This list does NOT include data subjects affected by the proposal/activity.

Response

Main researcher/lead artist - **Dr Nic Sandiland** (independent artist and co-founder of creative production company: Flexer&Sandiland)

Inspace/Institute for Design Informatics – **Miriam Walsh** (Research projects producer and Inspace gallery manager); **Nicola Osborne** (Manager of the Institute for Design Informatics (IDI)); **Evan Morgan** (Research Software Engineer, IDI); **Roxanne Wong** (IDI Research Support Assistant)

Further engagement with key stakeholders from across the IDI research community (including academics and others) and invited participants from wider publics – as this is a work in progress, some of these stakeholders may feed ideas and provocations into the developing work in areas related to the DPIA.

1.10 List of data subjects affected by the activity

For example: staff members, students, members of the public

Response

- Members of the public in the vicinity of the Inspace gallery and/or those visiting the gallery itself.
- Members of the University of Edinburgh staff and student body, as the Inspace gallery is located on the central university campus.
- Any additional visitors to the site during this work in progress installation and artists residency are likely to be attending following specific invitation or engagement with the project.

1.11 Other examples

Conduct a search for similar activities undertaken by either another part of the University or an outside organisation. This may save you time by learning from a DPIA done for a similar activity, or you might learn how that activity identified and mitigated risks, thus helping you with your own DPIA.

Response

We don't believe a similar project has taken place within the university or more widely in quite this form, although the taking of video and public images is commonplace throughout the university and wider area. Public participatory artworks are also commonplace both within and beyond the University.

This residency builds upon prior work by the artist (Nic Sandiland) which has been displayed in public before at Brighton Dome in 2023, and this experience has fed into the further development of the work and the responses in this DPIA.

In terms of other creative works that have adopted a similar methodology we would note, by way of background and context:

Live feeds have been used in the past by other artists including Bruce Nauman (Live Tape Loop Corridor 1970) and Raphael Lozano Hemmer (Underscan, 2005)

The proposed activity references and draws upon wider creative investigations, past and present, into the concept of 'following', 'public space', 'the everyday' and 'the camera's gaze' including but not limited to some below examples:

Vito Acconci's "Following Piece" 1969 - <https://www.metmuseum.org/art/collection/search/283737>

Work deriving from Walter Benjamin's commentary on the "Flaneur" and its psychogeographical aspects

Choreographer Anne Teresa De Keersmaeker, whose piece Slow Walk (2017) is of particular interest. Even though it's focus is less on following, it highlights the act of pedestrian walking in public space. Another inspiration for this work is that of structuralist filmmaker John Smith and his quite wonderful Girl Chewing Gum (1976) which looks at the role of the director and the everyday.

Additionally, there is currently a large-scale public "portal" installation in Dublin and New York which uses and reflects back in-public cameras (<https://www.portals.org/history>).

2 Compliance with Privacy Laws

2.1 Compliance Check

Data Protection legislation is relevant to any DPIA, and this section forms the data protection compliance check which should always be carried out. The Data Protection Officer will be able to advise you on the relevance of other privacy laws.

(Please note that no attachment is required here - we are unable to delete the functionality for just one section.)

2.2 What type of personal data are you processing?

For guidance on what personal data is, consult the [definitions](#).

Response

Justification

None

2.6 List the personal data you are going to process?

For guidance on what personal data is, consult the [definitions](#).

Response

Personal data is limited to the use of a live feed video of people in public spaces. These images will not always be identifiable to the viewer (dependent on angle/quality etc). Images will not be retained but are used in a live artistic installation/experience context.

2.7 Which of the legal bases in Article 6 (1) will provide a lawful basis for the processing?

Which of the legal bases in Article 6 (1) will provide a lawful basis for the processing? Consult the document [Guidance – how to determine the legal basis for processing personal data](#)

If you choose more than one legal basis, you will need to explain which legal basis applies to which part of your processing activity.

Response

Justification

The legal basis for the processing of data as part of this installation is legitimate interest as noted in (question 1.7) highlighting the potential societal benefits. This work will encourage members of the public to take a more critical perspective on the use and processing of their data in public contexts, potentially providing significant benefits to their ongoing understanding and engagement with other forms of public data capture.

Signs are also being displayed in public view notifying that the area is being live streamed and where possible and appropriate explicit consent will be obtained.

2.8 Have you completed a Legitimate Interest Assessment (LIA)?

If you have not yet completed a Legitimate Interest Assessment, click 'no' here and one will be automatically assigned to you.

Response

Justification

None

2.9 Are you processing a special category of personal data?

Click all those that apply or, if you are not processing a special category, click 'No'.

Response

Justification

None

2.11 How are individuals being made aware of how their personal data will be used?

Check if what you intend to do is already covered in one of the University privacy notices, a list of which can be found [here](#). If not, you will need to either ask for it to be included in the relevant privacy notice(s) or create a bespoke privacy notice. Templates for bespoke notices can be found [here](#).

Response

Signs are being displayed in public view notifying that the area is being live streamed. We will also link to this DPIA via information on our website, so that we are transparent and communicative about this aspect of the work. In person signage will be displayed on the entrance and exist of Inspace also highlighting the live stream and signposting the DPIA

2.12 Does the activity involve the use of existing personal data for new purposes?

Response

Justification

None

2.13 Can you confirm that data collection procedures are adequate, relevant and not excessive, i.e. that you are not collecting more information than necessary?

Response

Yes

Justification

It is only the livesteam feed in its raw format that is necessary for the operation of the artwork and it is only the documentation of the residency and installation that poses a risk of data capture that contains personal identifiable data being stored.

2.14 How will the personal data be checked for accuracy?

Response

Captured data will be checked for personal identifiable data. Any documentation images/footage containing personal identifiable data will go through a process of anonymisation/pseudonymisation before publishing or explicit permission will be sought where appropriate and possible. No additional information is being used outside of live footage so there are no relevant checks for accuracy/up-to-dateness required or possible.

2.15 How long will the personal data be retained for?

Response

Images and footage pre-anonymisation/pseudonymisation will be deleted. Any images and footage for the purposes of documentation, which may contain personal data IF explicit consent has been obtained, will be retained for a period of ten years. These will usually be in an edited and minimal form and will not include the raw live footage.

2.16 What technical and organisational security measures will be in place to prevent any unauthorised or unlawful processing of the personal data?

Response

Camera feeds will be supported through closed/private wifi systems with secure password protection and, if required, encryption. Access to the camera and raw footage of the camera's live feeds will only be accessible to the resident artist and the small group of IDI and Inspace staff supporting him to undertake his work (Walsh, Morgan, Osborne, Wong). Documentation data capture and editing will be limited to members of the project team who are part of the University of Edinburgh. If any additional editing support is required, we will ensure only edited and anonymized/psuedonimised footage is supplied and that staffing is fully briefed and engaged with this DPIA. All footage and images containing personal data will be stored securely on University of Edinburgh SharePoint only.

Documentation – which should only include personally identifiable images or footage for which we have explicit consent – will be shared more widely as an archive of the work.

2.17 Has the personal data been evaluated to determine whether its processing could cause unwarranted damage or distress to data subjects?

Response

Yes

Justification

We have discussed this proposal with the University Data Protection Officer and this work has been deemed very low risk

2.18 Will you use automated means to make decisions about or profile individuals?

Are you going to use Artificial Intelligence to make decisions about people without any human intervention that will have a significant effect on them? An example of this is credit rating companies that use algorithms to determine an applicant's credit score. If yes, please explain below.

Response

No

Justification

None

2.19 Do you use a data processor?

Response

No

Justification

None

2.23 Will you be transferring personal data to a country outside of the European Union or the European Economic Area (EEA)?

[Countries in the EU](#)
[Countries in the EEA](#)

Response

No

Justification

None

2.35 If the data will be anonymised, is it likely that a 'motivated intruder' will be interested in attempting re-identification by linking the data with other information available to them?

For guidance on 'motivated intruders', please see [here](#).

Response

No

Justification

The data being collected which has may include some personal identifiable data is limited in usefulness to an intruder and therefore this presents an extremely low risk

2.36 If a subject access request (SAR) is received for personal data included in the activity, how easy is it to comply? Is the data easily accessible elsewhere?

Consider whether if the University receives a subject access request you easily find and extract the relevant personal data, or if the 'golden copy' is held elsewhere. Guidance on how to answer SARs can be found [here](#).

Response

Not Applicable

2.37 Are you able to comply with requests for erasure or restriction of processing? Can you apply an exemption?

For help with deciding whether an exemption applies, consult chapter 11 of the Data Protection Handbook, which can be found [here](#).

Response

We can comply

Justification

For subjects of the live stream this data is not recorded. Therefore, this applies only to documentation of the work as we will not hold any other data. Removal is possible to a limited extent, for all unpublished data stored in SharePoint that has not yet been anonymised/pseudonymised. However, if a subject is able to look at psuedonymised footage and recognise themselves (e.g. by colour of coat) we could also remove them from this documentation material.

2.38 Are provisions in place in case a data protection breach occurs as part of the activity?

Ensure that you are familiar with the University data protection breach reporting procedure, available on the website [here](#).

Response

There is only minimal possibility of data breach here, and very limited risk associated with a data breach. We are familiar with University process in the event of a data breach, and also of ICO regulations in this area and are prepared to make all the appropriate notifications should they be required.

2.39 From the Data Protection compliance check in this section we have concluded:

Have you satisfied all the requirements asked for above? If you answer no, then please give a reasoning why and why you believe the DPIA should still be approved.

Response

We have concluded that if the activity goes ahead as detailed here, processing is data protection compliant.

Justification

Our approach for this project is compliant because:

- We have determined that we are collecting the minimum data required for the purpose of delivering the intended outcome
- We are being transparent and communicative (including the display of public notices and publishing of the DPIA) about the data we are collecting for the duration of the project and why
- We are limiting the data we store to documentation data only
- Documentation data will be reviewed and evaluated for the presence of personal identifiable data for the livestream and explicit consent will be obtained from visitors where appropriate and possible
- Documentation data will be anonymised/pseudonymised to protect personal data/identity unless explicit consent has been appropriately obtained
- We will store data securely and limit access
- We have outlined an appropriate data retention period and will minimise the scope of data being stored over this period

3 Screening

3.1 Screening

The answers to the following questions will determine whether you need to continue to the next stage. If you have answered all screening questions with 'no', then you can stop here - you will not need to carry out a full DPIA.

3.2 Will there be new or additional information technologies that have the potential for privacy intrusion?

This could involve external suppliers of software having access to personal data.

Response

No

Justification

CCTV camera placed outside of the building pointing at public space. These will be overt rather than covert, and a notice will be visible in their location with signposting to this DPIA

3.3 Will the activity involve the collection of new identifiable or potentially identifiable information about individuals?

Response

Yes

Justification

New identifiable/potentially identifiable information will be collected only in the form of documentation of the artwork and all efforts to minimise the capture of identifiable data of persons within the livestream will be made. No livestream footage will be recorded or stored as part of the installation. Collection of identifiable data of visitors to the installation will be carried out but only of those who have provided explicit consent.

3.4 Will the activity compel individuals to provide information about themselves, i.e. where they will have little awareness or choice?

Response

No

Justification

None

3.5 Identification methods - Will there be new or substantially changed identity authentication requirements that may be intrusive or onerous, such as new log in requirements?

Response

No

Justification

None

3.6 Will any other organisations outside the University have access to the personal data?

Response

Yes

Justification

The Artists (Nic Sandiland and Yael Flexer operating collectively as "Flexer & Sandiland") are the only people outside of University Team members who will have access to collected data. This access will however be limited to data that has already been anonymised/pseudonymised with the exception of footage or images with personal data where explicit consent has been obtained. In the case that additional editing support is required, we will ensure only edited and anonymized/psuedonimised footage is supplied and that the editor is fully briefed and engaged with this DPIA.

3.7 Will there be new or significant changes to the handling of special categories of personal data or data that would be considered sensitive by the data subjects?

Response

No

Justification

None

3.8 Are you using information about individuals for a purpose it is not currently used for or in a new way?

Response

No

Justification

None

3.10 Will there be new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources?

Response

No

Justification

None

3.11 Will there be new or changed ways of data collection that may be considered intrusive?

Examples are:

- CCTV cameras in a coffee lounge
- fingerprint authentication to enter the library
- non-anonymous surveys into teaching quality

Response

No

Justification

A new and temporary CCTV camera will be placed in the window of Inspace pointing at public space along Potterrow and capturing real-time images of passers-by. There is no expectation in the UK for privacy to apply to those walking in a public street and therefore this is unlikely to be deemed intrusive. However, to further minimize risk here, no data from this camera will be recorded or stored (it is fed into the artwork in real time only). It is only through the capture of photo and video documentation of the artwork installation that there is a small risk of capture of personal data from this camera, and therefore every effort is being made in documentation processes to minimise intrusiveness.

Documentation of this work is similar to the standard approach (photographs, video of the work in progress and audiences engaging with it) to the documentation of artworks, exhibitions and public presentations in public venues like Inspace. This is always done with full transparency and clear communication via signage and verbal announcements.

3.12 Will there be changes to data quality assurance or processes and standards?

Response

No

Justification

None

3.13 Are there any concerns about new or changed data security arrangements?

Response

No

Justification

None

3.14 Are there concerns about new or changed access or disclosure arrangements?

Response

No

Justification

None

3.15 Will there be new or changed data retention arrangements?

Response

No

Justification

None

3.16 Will there be changes to the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?

Response

No

Justification

None

3.17 Requirement to complete full DPIA

Your responses in this section indicate that you are required to continue on to the full DPIA

4 Risk identification

4.1 Risk identification and assessment

Below, you will find a list of 14 common risks.

If any of these risks apply, choose them by answering 'yes' and providing a short description of the risk and how you would mitigate the risk.

If the risk applies – select 'Yes'. As a result you will be required to:

1. Provide a brief explanation / consequence of the risk occurring
2. Provide a brief explanation of the mitigating factors that will be undertaken to either eliminate or lower the risk
3. In considering the defined mitigation measures, determine the likelihood of the risk occurring to be Low, Medium or High **after** mitigation.
4. In considering the defined mitigation measures, determine the impact on the data subjects and on the University to be Low, Medium or High **after** mitigation.

If the risk does not apply, select 'No'

Note: If **after mitigation** you still have **high risks**, the processing activity will have to be notified to the Information Commissioner!

When you have considered these 14 possible risks, there is space to describe **up to 3 additional risks** not listed in the potential risks.

4.2 Possibility that personal data is shared inappropriately.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

Yes

Justification

Accidental inappropriate sharing by member of the project team: Personal data is being captured via the documentation of the artwork installation and only the artist and University of Edinburgh team members will have access to this data, have co-written this DPIA, and therefore understand and agree on the approach to data collection therefore eliminating this risk.

Personal data could be shared by a third party once published online: Any documentation footage or photos containing personal data for which explicit consent was obtained will be published online. This always presents a risk of further inappropriate sharing.

4.3 What can you do to eliminate or at least reduce the risk?

Explain all mitigation measures you will put in place.

Response

Mitigations to reduce risks:

- only the artist and University of Edinburgh team members will have access to this personal data and have co-written and agreed upon what is outlined in this DPIA
- We will include and agree upon image and video credits at the point of publishing so that any permission requests can be made to and be approved/rejected by project team members
- action to request removal of known inappropriate sharing will be taken by the project manager or the appropriate project team member.

4.4 Is the overall residual risk after the mitigation measures low, medium or high? Provide an explanation for your choice.

Response

Low

Justification

Please see answers to questions 4.2 and 4.3 above

Risks



Inherent Risk Score
2.0 - Low Impact / Low Probability



Residual Risk Score
2.0 - Low Impact / Low Probability

Stage

Identified

4.5 Personal data may be used for a new and different purpose without the knowledge of the data subjects, perhaps due to a change in the context in which the data is used.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

Yes

Justification

Passersby may not see signage or notices since this is a temporary installation: Footage of passersby on the street outside of Inspace, that may include personal data, will be transmitted into the building in the form of a live feed, and incorporated into the artwork and installation, thus changing context. Subjects who have not seen or read signage publicly displayed on Inspace maybe be unaware making this a risk.

4.6 What can you do to eliminate or at least reduce the risk?

Explain all mitigation measures you will put in place.

Response

Mitigations to reduce risks:

- The live feed is not recorded or stored therefore the unknowing participation is minimised as much as possible
- Any documentation including personal data will be anonymised/pseudonymised and the raw footage deleted
- Externally facing and clear signage will be placed in a couple of locations to increase visibility and awareness

4.7 Is the overall residual risk after the mitigation measures low, medium or high? Provide an explanation for your choice.

Response

Low

Justification

Please see answers to questions 4.5 and 4.6 above

Risks



Inherent Risk Score
2.0 - Low Impact / Low Probability



Residual Risk Score
2.0 - Low Impact / Low Probability

Stage

Identified

4.8 New surveillance methods such as CCTV, email monitoring etc. may be an unjustified intrusion on people's privacy.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

Yes

Justification

A new temporary camera runs this risk of some negative feedback on justification: This is a new temporary CCTV camera and therefore this does present some risk here, however this is an extremely low risk as there is no expectation of privacy on a public street in the UK

4.9 What can you do to eliminate or at least reduce the risk?

Explain all mitigation measures you will put in place.

Response

To Mitigate any perceived intrusion, we will:

- Ensure no data from this camera will be recorded or stored
- Operate the camera only when active development, testing and presentations are happening
- Limit the capture of personal data to documentation of the artwork only
- Be transparent and communicative about the intention of CCTV capture as part of the work Display public facing signage clearly identifying the camera in the window of Inspace
- Make the DPIA publicly available

4.10 Is the overall residual risk after the mitigation measures low, medium or high? Provide an explanation for your choice.

Response

Low

Justification

Please see answers to questions 4.8 and 4.9 above

Risks



Inherent Risk Score
2.0 - Low Impact / Low Probability



Residual Risk Score
2.0 - Low Impact / Low Probability

Stage

Identified

4.11 Actions taken against individuals as a result of collecting information about them might be to their detriment or cause damage/distress.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

The personal data being collected is so limited that we do not believe this presents a risk.

4.14 People cannot use a service anonymously because identifiers might be collected and linked, if anonymity is what people were led to expect.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

This does not apply as only those who have provided explicit consent for data collection while visiting the installation will be recorded. For those that have not provided consent no video footage or photo capture will be taken

4.17 Vulnerable people may be particularly concerned about the risks of identification or the disclosure of information if anonymity is what people were led to expect.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

The camera capture is street facing and so this is public space where there is no expectation of anonymity. Within the installation it is only those who have provided explicit consent that will be the subjects of documentation capture, consent will be asked prior to the visit and will be optional and there will be opportunities to visit the installation where no documentation work is taking place.

4.20 Collecting information, matching and linking identifiers or whole datasets might mean that data are no longer anonymous if anonymity is what people were led to expect.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

This is not a risk associated with planned project activity

4.23 Excess information collection or information not properly managed can lead to creation of duplicate records.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

Concerted efforts have been made by the project team minimise the data being collected and stored across the project timeframe and this will be managed by Inspace Gallery Manager using dedicated SharePoint folders in designated appropriate locations that are in line with the Insititute's file storage system

4.26 If a retention period is not established information might be used for longer than necessary.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

This does not apply as:

- We have established an appropriate retention period for this projects data (10 years)
- All project folders are dated accordingly so that identification is easily managed
- When the retention period has expired content due for deletion can be easily located and deleted

4.29 The use of biometric information or potentially intrusive tracking technologies may cause increased concern and cause people to avoid engaging with the University.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

No biometric information of intrusive tracking technologies are being used in this work

4.32 Public distrust about how information is used can damage the University's reputation and lead to loss of business.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

We do not believe this represents a significant risk here. We are being transparent and communicative about what we are doing and why we are doing it. Alongside this we will publish the DPIA openly with the intention of this being part of the dialogue with audiences, and for this sharing to also contribute to building public trust in how information is used by the Institute for Design Informatics and the University

4.35 Data loss causing damage or distress to individuals or damage the University's business

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

The data being collected in this case is very limited therefore making this not a risk

4.38 Despite proper security, is there an increased possibility of external unlawful access to the data such as hacking?

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

The data being collected in this project does not present a hacking risk given its size and limited scope

4.41 Using an external data processor or sharing with another data controller increases the risk of unlawful access to personal data.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

No external data processor will be used for this project

4.44 Are you transferring personal data to a non-EEA country ?

Since the European Court of Justice decision in July 2020, a special risk assessment is required for transfer of personal data in particular to the US but also to other non-EEA countries. Please assess how likely it is that despite the use of a safeguard such as the Standard Contractual Clauses or a contract in the interest of the data subject the data is likely to be accessed, for example under the Patriot Act in the US.

If the answer to this question is 'yes', then this question will be approved by your Head of School or College respectively Director of Support Area or their delegates.

Response

No

Justification

None

4.47 Any other risk you have identified - describe below.

If this risk applies, click 'yes' and give a brief explanation of why the risk applies.

If the risk does not apply, click 'no'

Response

No

Justification

None

6 Review

6.1 Set a date for the scheduled review - such as in 6 months or a year

The purpose of a review is to ensure that the mitigation measures introduced as part of the DPIA are working effectively. It is expected that such a review, particularly in the case of major DPIAs, will be carried out as part of the wider review into the effectiveness of the activity deliverables. For smaller DPIAs, the review may be carried out as a standalone process. Either way, upon completion of the DPIA you should record how this review will be carried out, by whom, and when.

Response

01/10/2024

6.2 Who will carry out the review?

Name the person or team that will carry out the review at the specified date.

Response

The Project Team

Miriam Walsh

Nicola Osborne

Dr Nic Sandiland

Evan Morgan

Yael Flexor

Potentially also supported by DI staff: Roxanne Wong, Mark Kobine

7 Submit

7.1 Submit

Please now click the blue 'Submit' button in the bottom right corner.