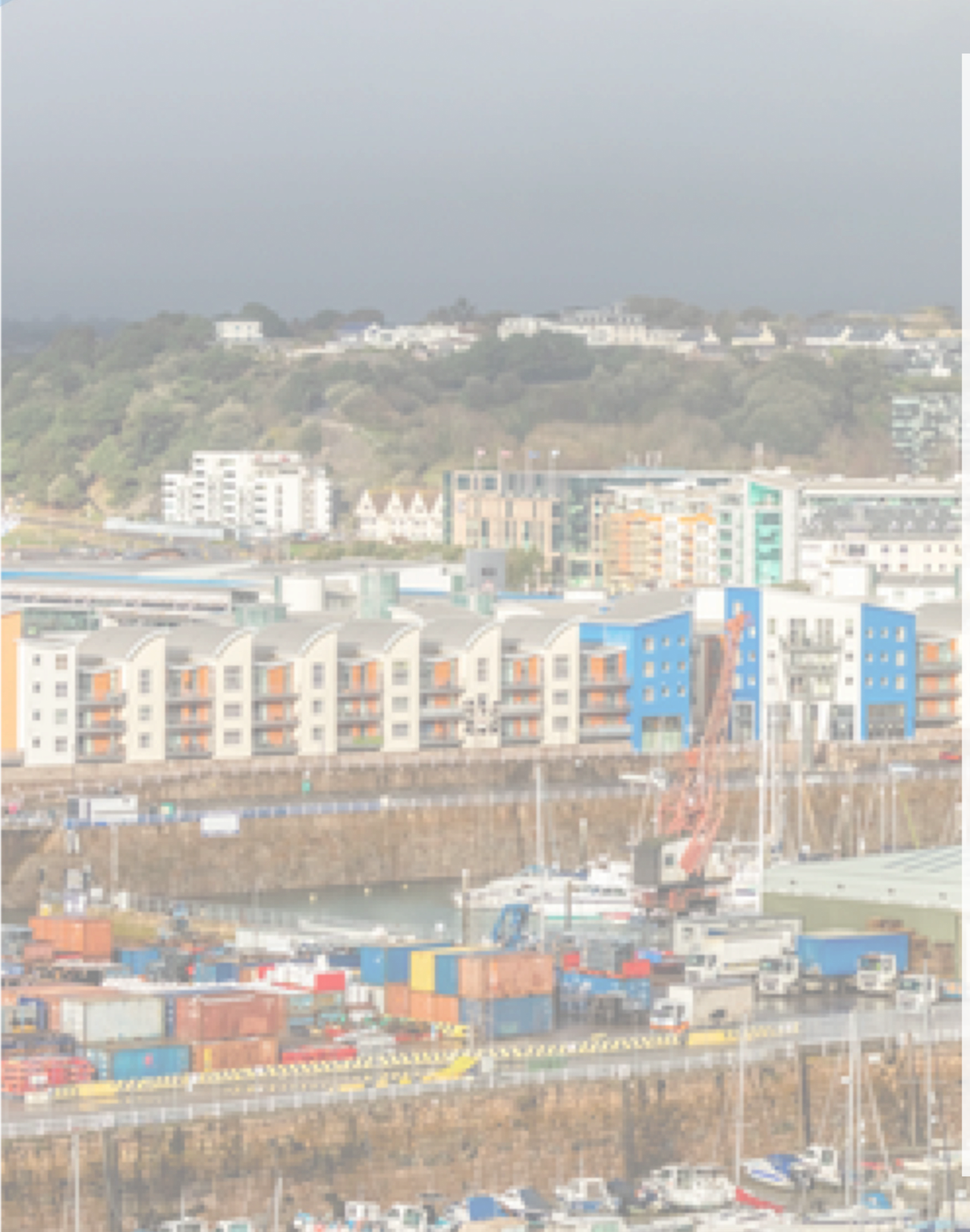


Facit

Case study:

Ports of Jersey

Strengthening Data Protection Across Jersey's Transport Infrastructure

Overview

Ports of Jersey, the government-owned organisation managing Jersey Airport, harbours, marinas and coastguard services, adopted Facit's Identity Cloak to modernise its video redaction capability. With legacy tools unable to handle the dynamic, crowded environments of busy transport hubs, the governance team needed a solution that was both legally compliant and operationally practical — and Identity Cloak's AI-powered dynamic tracking, zoom functionality, and seamless integration with existing systems delivered exactly that.

Objectives

- Replace inadequate legacy tools with AI-powered dynamic redaction.
- Handle complex SARs efficiently without increasing manual workload.
- Maintain privacy safeguards without relying on facial recognition technology.
- Strengthen data governance proactively ahead of rising request volumes.

Introduction:
Protecting Data at the Heart of Island Life

For an island community, transport infrastructure is far more than a convenience. In Jersey, it is a lifeline.

Ports of Jersey is the incorporated, government-owned organisation responsible for operating Jersey Airport and the island's harbours, marinas and coastguard services. Its remit stretches across passenger travel, freight logistics, maritime safety and the management of some of the island's busiest and most complex public spaces.

Every day, Ports of Jersey enables the movement of people, goods and services that keep the island functioning. Jersey Airport alone handles between 1.3 and 1.5 million passengers annually, while ferry services remain an essential part of both the visitor economy and the island's supply chain. 384,000 passengers travelled by sea during 2025 and almost all goods entering Jersey (estimated 98.6 per cent) arrive through the island's ports infrastructure.

The organisation's operational footprint is extensive. It includes Jersey Airport, St Helier Harbour, outlying harbours, marinas and coastguard operations, all of which require continuous monitoring and management.

Passenger terminals, freight handling zones, vehicle marshalling areas, quaysides and public concourses are all covered by CCTV systems designed to support safety, security and efficient operations.

At the same time, Ports of Jersey recognises that passenger experience is a key performance indicator. Visitors, residents, airline crews, ferry passengers, logistics operators and local businesses all interact with the organisation. Maintaining trust is therefore essential.
That trust increasingly depends not only on physical security, but also on responsible data governance.

Like many organisations operating extensive CCTV networks, Ports of Jersey faced a growing challenge: how to respond efficiently, lawfully and proportionately to requests for video footage while protecting the privacy rights of everyone captured within it.

The answer came through the adoption of Identity Cloak video redaction software from Facit.

The Challenge:

Governance: Balancing Access Rights with Privacy Obligations

Responsibility for Data Protection

Responsibility for data protection and governance at Ports of Jersey sits with a small but highly experienced team.
Nia Richardson serves as Data Protection Officer, Company Secretary and Corporate Governance Manager, while Szilvia Hausel supports governance, compliance and operational data protection activities across the organisation.

Together, they oversee compliance with Jersey's data protection regulations, staff training, incident response procedures and governance standards. Their role is both strategic and highly practical.

Training extends beyond standard e-learning modules. Scenario-based exercises help staff to recognise data protection risks, escalate incidents appropriately and manage sensitive information responsibly in real-world operational settings.

This practical mindset also applies to CCTV governance.

Rise in SARs

Ports of Jersey has historically experienced relatively few subject access requests relating to video footage. Most requests arose from minor incidents, such as passengers slipping or falling within terminals or harbour areas. Occasionally, solicitors requested footage linked to insurance claims or disputes. Residents also sometimes requested access to footage involving themselves.

More recently, however, the governance team began identifying a wider trend. Public understanding of data rights has increased significantly in recent years. Individuals are more aware of what organisations can and cannot do with personal data and increasingly are exercising their rights of access.

That change is beginning to affect transport operators across Europe and the British Isles.

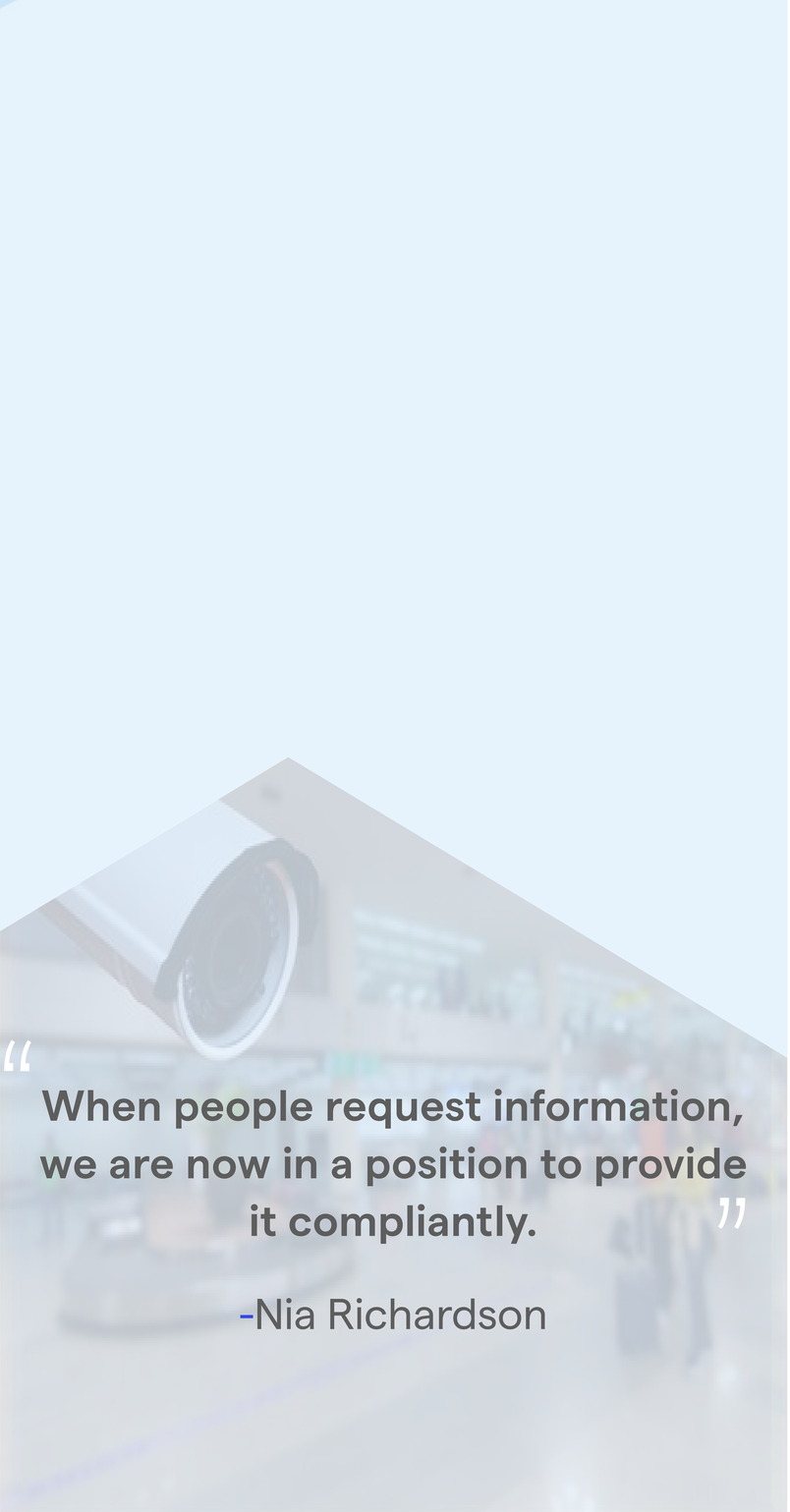
Varied nature of Requests

Ports of Jersey has seen a noticeable increase in requests linked to refused boarding incidents, often involving disputes around passport validity, travel documentation or post-Brexit residency rules between the UK and EU member states. Passengers who believe they were incorrectly denied boarding may request CCTV footage as part of complaints, insurance matters or legal advice processes.

In parallel, law enforcement agencies remain frequent requesters of video footage for operational and evidential purposes.

Ports of Jersey may also receive requests from commercial partners, including airlines, ferry operators, freight carriers and retail concessionaires. However, the governance team maintains strict controls around disclosure. Footage is only shared when requests meet clearly defined legal, operational and proportionality thresholds.

This is where the complexity begins.



> "When people request information, we are now in a position to provide it compliantly."
>
> -Nia Richardson

Legacy Redaction Tools Were No Longer Fit for Purpose

Under data protection law, organisations cannot simply release raw CCTV footage if it contains identifiable images of unrelated third parties. Before footage can be disclosed in response to a Subject Access Request or other lawful request, other individuals captured in the recording must be anonymised or redacted unless a lawful exemption applies.

In practice, video redaction can be extremely difficult in busy transport environments. Airport terminals, harbour check-in areas and ferry embarkation points are dynamic, crowded spaces. Passengers move unpredictably. Children run through frame. Groups merge and separate. Individuals walk behind one another and frequently enter and exit camera views.

Ports of Jersey's existing video management systems technically included redaction functionality, but the tools were limited. The available method relied on static black boxes manually placed over individuals within footage. Those boxes did not intelligently follow people as they moved through the frame.

As a result, the process was cumbersome, time-consuming and ineffective.

If an individual moved outside the manually positioned area, they were no longer properly obscured. Operators had to reposition masking boxes repeatedly, frame by frame, which increased administrative burden and introduced greater risk of human error.

In practical terms, the lack of a reliable redaction solution created situations where some requests became impossible to fulfil.

A denied boarding request in a crowded terminal could involve dozens of unrelated passengers appearing within the same footage sequence. Children moving unpredictably through frame made accurate redaction even harder.

The issue was not unwillingness to comply. The legacy redaction tool was simply not designed for modern governance expectations. Ports of Jersey needed a solution that would strengthen compliance while remaining practical for a lean governance team managing multiple responsibilities across a critical national infrastructure environment.

The Solution:

Facit's Identity Cloak

Automated Redaction capability

After reviewing available options, Ports of Jersey selected Facit's Identity Cloak. The decision was driven primarily by the software's automated dynamic redaction capability.

Unlike traditional manual blurring tools, Identity Cloak uses AI-powered tracking of individuals continuously through video footage. Rather than relying on operators to manually reposition redaction boxes frame by frame, the software dynamically tracks movement throughout the scene. Automated tracking significantly reduces manual workload while improving consistency and reliability. Importantly, the software does not use facial recognition technology. That distinction mattered greatly to Ports of Jersey. The AI functionality identifies shapes and movement patterns for tracking purposes, but it does not attempt to identify specific individuals. Facial recognition would not align with Ports of Jersey's data capture policies or governance principles.

Identity Cloak's tracking technology enabled the organisation to improve operational efficiency without expanding into more intrusive forms of biometric surveillance.

Custom Redaction Features

Another deciding factor was Identity Cloak's zoom and crop functionality.

Many CCTV cameras across airport and harbour environments monitor wide operational areas. Subjects may appear relatively small or distant within frame. The ability to zoom into footage while maintaining effective redaction controls proved especially valuable for Ports of Jersey's operational environment.

Ease of Deployment

Just as important was ease of Implementing a new system. Identity Cloak integrated cleanly with Ports of Jersey's existing video management systems, which avoided the need for disruptive infrastructure replacement or complex redesign. For a resource-conscious organisation where staff routinely manage multiple responsibilities, uncomplicated integration was a major advantage.

Only four authorised users currently operate Identity Cloak directly, alongside support from the IT department. Despite the relatively low volume of SARs at present, early feedback from users has been consistently positive.
The system has proven intuitive, straightforward to learn and significantly more efficient than previous approaches

Governance Beyond Technology: Human Oversight Still Matters

Although automation has transformed the redaction process, Ports of Jersey remains clear that technology alone is never enough. Final human review remains an essential component of compliant disclosure practice.

The team oversee review procedures to ensure all released footage conforms to legal and governance requirements. Final checks and fine-tuning are conducted before any footage is disclosed externally, which reflects a broader governance philosophy within the organisation.

The governance team also conducts regular Data Protection Impact Assessments (DPIAs). For CCTV systems, DPIAs are particularly important because surveillance footage can capture large volumes of personal data across public environments. DPIAs help organisations assess necessity, proportionality, retention policies, access controls and disclosure risks before problems arise.

For Ports of Jersey, this process ensures that operational security measures remain aligned with privacy rights and public expectations. That balance is increasingly important in transport environments where surveillance is essential for safety, but public trust depends on transparency and restraint.

Results:

Future-Ready Compliance and Greater Operational Confidence

Although implementation remains relatively recent, the benefits of Identity Cloak are already becoming clear. Most importantly, Ports of Jersey now has confidence that it can respond compliantly to increasingly complex video access requests. Requests that would previously have been operationally prohibitive — particularly those involving busy public spaces — are now manageable.

The software has also improved efficiency for staff. For a lean team wearing multiple hats across governance, data protection and operations, reducing manual processing time is critical. The organisation is also better prepared for future demand. Across both public and private sectors, SARs continue to rise as individuals become more familiar with their legal entitlements.

Ports of Jersey recognised that waiting until request volumes became unmanageable would have been reactive rather than strategic. Instead, the organisation chose to strengthen its governance capabilities early, before operational pressure intensified further. Ports of Jersey's proactive approach reflects the wider culture within the organisation: balancing operational resilience, legal compliance and public trust across infrastructure that Jersey depends on every day.

> "We really like Identity Cloak. Identity Cloak is not only very simple, but very effective."
>
> Nia Richardson , Data Protection Officer

Conclusion:

Building Trust Through Practical Governance

For Ports of Jersey, adopting Identity Cloak formed part of a broader effort to modernise governance capabilities within one of the island's most important public service organisations. Managing airports, harbours, marinas and coastguard operations means managing vast flows of people, goods and information. Surveillance systems are indispensable for safety and operational continuity, but they also create significant responsibilities around privacy and lawful disclosure.

Ports of Jersey recognised that its redaction capabilities were no longer sufficient for the realities of modern data governance. By implementing Identity Cloak, the organisation strengthened a critical part of its compliance toolkit. The combination of AI-powered dynamic redaction, practical usability, zoom functionality and seamless integration has enabled the governance team to handle requests more effectively while maintaining strong privacy safeguards. Most importantly, Identity Cloak supports a principle at the centre of modern public-sector governance:
Organisations must be able to protect both security and individual rights at the same time.
For Ports of Jersey, that balance is now significantly easier to achieve.

About Facit

Cutting-edge compliance and video analytics software

Solve problems, create opportunities and enhance business operations

23	170+	2
Countries where Facit solutions are developed	Current customers	Technology patents granted

Commitment to quality. Simplicity. Excellence. Innovation

Commitment to quality
We offer consistently high-performing products thanks to years of in-depth team experience and innovative testing.

Simplicity
We offer simple solutions to complex problems, saving you time and resources.

Excellence
We help our clients future-proof their organisations with compliant document and video redaction solutions.

Innovation
We work with the brightest minds from around the world to deliver innovative solutions for our compliance and video analytics clients.

Facit

Facit

8 Rankin House,
Murdoch Court, Knowlhill,
Milton Keynes, MK5 8GB, UK

+44 (0)3700 610 498

info@facit.ai

www.facit.ai

Connect with us