

## Decision Note – Staffordshire PSHE Co-Ordinator



**STAFFORDSHIRE COMMISSIONER**  
Police | Fire and Rescue | Crime

### REQUEST FOR DECISION BY THE STAFFORDSHIRE COMMISSIONER

	Policing:	Crime:	Fire & Rescue:
This decision relates to:		X	

### APPROVAL (for completion by Staffordshire Commissioner only)

Rationale for approval

**STAFFORDSHIRE COMMISSIONER**

Signature

A handwritten signature in black ink, appearing to be 'Ben'.

Date 22/10/2021

Date decision required by: end October 2021

If an urgent approval is required, please state reasons:

**For completion by Staffordshire Commissioner's Office only:-**

Decision Number: SCP/D/202122/004

Date Received: 26 October 2021

	Yes	No
Has the required decision been considered under the guidance of the Staffordshire Commissioner's Decision Making Policy?	✓	
Has the required decision been deemed to be a Key Decision as defined within the Staffordshire Commissioner's Decision Making Policy?	✓	
Who is empowered to make the required decision?		
Staffordshire Commissioner		

<b>Title</b>	<b>Staffordshire PSHE Co-Ordinator</b>
<b>Summary:</b>	
<p>Discussions have taken place with SCYVYS Staffordshire Council of Voluntary Youth Services to host the PSHE Co-ordinator post for Staffordshire.</p> <p>The post will mirror the work that is taking place in the City to ensure that we have a consistent approach to PSHE delivery across Staffordshire. The Co-ordinator will work with schools and alternative education establishments to develop age appropriate, quality assured, consistent universal and targeted PSHE offer with a particular priority of community safety (e.g. gangs and youth violence, child abuse and exploitation, child criminal exploitation, antisocial behaviour, internet safety personal safety and developing and maintaining healthy and positive relationships including Domestic Abuse).</p> <p>The approach will comprise universal and targeted elements; universal education for all school-age children (5-16 year olds) and for young people in further/higher education; targeted education for children and young people, delivered to those determined to be more vulnerable / having more risk factors; and targeted input into educational establishments, colleges and universities based on intelligence.</p> <p>PSHE provision across Staffordshire will be mapped and reviewed for gaps/improvements resulting in one online accessible space and support for educational establishments to access relevant, good quality training and resources and access to a network of contacts within the local area to advance PSHE education activity, including the Local Authority, Police, Ofsted, the Home Office, the Department for Education and local specialist service providers.</p> <p>The post will be supported by an Education Champion – Orme Academy part of the Shaw Trust have agreed to support the post and work going forward.</p> <p>A matrix management approach will be in place with SCO/SCYVYS/Orme Academy to support the post and oversee progress. An annual work plan will be agreed and shared with partners.</p>	
<b>Recommendation:</b>	

The Staffordshire Commissioner supports SCYVYS hosting the Staffordshire PSHE Co-ordinator post (full time post) for 3 years by providing the following funding:

Year 1: £48,500 – consists of £40,000 per annum salary and on costs, £5,000 budget, £3,500 one off set up costs and training.

Year 2 £46,000 – consists of £41,000 per annum salary and on costs, £5,000 budget

Year 3 £46,000 – consists of £41,000 per annum salary and on cost, £5,000 budget

#### Chief Executive

I hereby approve the recommendation for consideration.

Signature



Date 07/10/2021

## REPORT AND ADVICE TO THE STAFFORDSHIRE COMMISSIONER

### 1. Introduction and background

It is well reported and recognised that PSHE education helps pupils to develop the knowledge, skills and attributes they need to thrive as individuals, family members and members of society. These skills and attributes help pupils to stay healthy, safe and prepare them for life and work. When taught well, PSHE education helps pupils achieve their academic potential, and leave education equipped with skills they will need throughout their later life.

The National Curriculum states that “all schools should make provision for PSHE education drawing on good practice.” The relationships and health aspects of PSHE education are compulsory in all schools from September 2020.

The Ofsted guidance; ‘Safeguarding children and young people in education from knife crime’ (March 2019) suggests as one of its recommendations that leaders within educational establishments should consider how their PSHE education curriculum reflects local safeguarding issues and trends, including knife crime.

### 2. Issues for consideration

Following discussions with the Procurement Team, it has been agreed that a waiver will be completed and then a grant agreement would be the best way forward, Legal Services have reviewed the existing grant agreement used by the office and made amendments for this arrangement.

### 3. What other options have been considered?

Various attempts have been made to engage partners/ education establishments to host the post without success. To keep the post on an independent footing SCYVYS expressed an interest after careful

consideration. This is an appropriate approach, ensuring that an education champion is supportive of the work.

#### 4. Consultation and Engagement undertaken

Partners have been kept informed of the progress of this area of work via the Staffordshire Early Help and Place Based Approach Working Group, Reducing Reoffending Board and Serious Violence Delivery Group.

### Report Implications

#### Monitoring Officer comments:

Signature



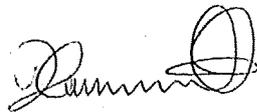
Date

07/10/2021

#### Section 151 Officer comments:

Funding is included within the Budget 2021/22 and MTFS.

Signature



Date

20/10/2021

	Yes	No
Has legal advice (outside of that provided by the Monitoring Officer) been sought on the content of this report?	√	

#### Legal Comments:

Tim Crane Solicitor has reviewed the grant agreement used by the Office and made amendments to suit the arrangement with SCYVYS.

#### 5. Equality Comments – please attach the completed EIA

enclosed

#### 6. Background/supporting paper

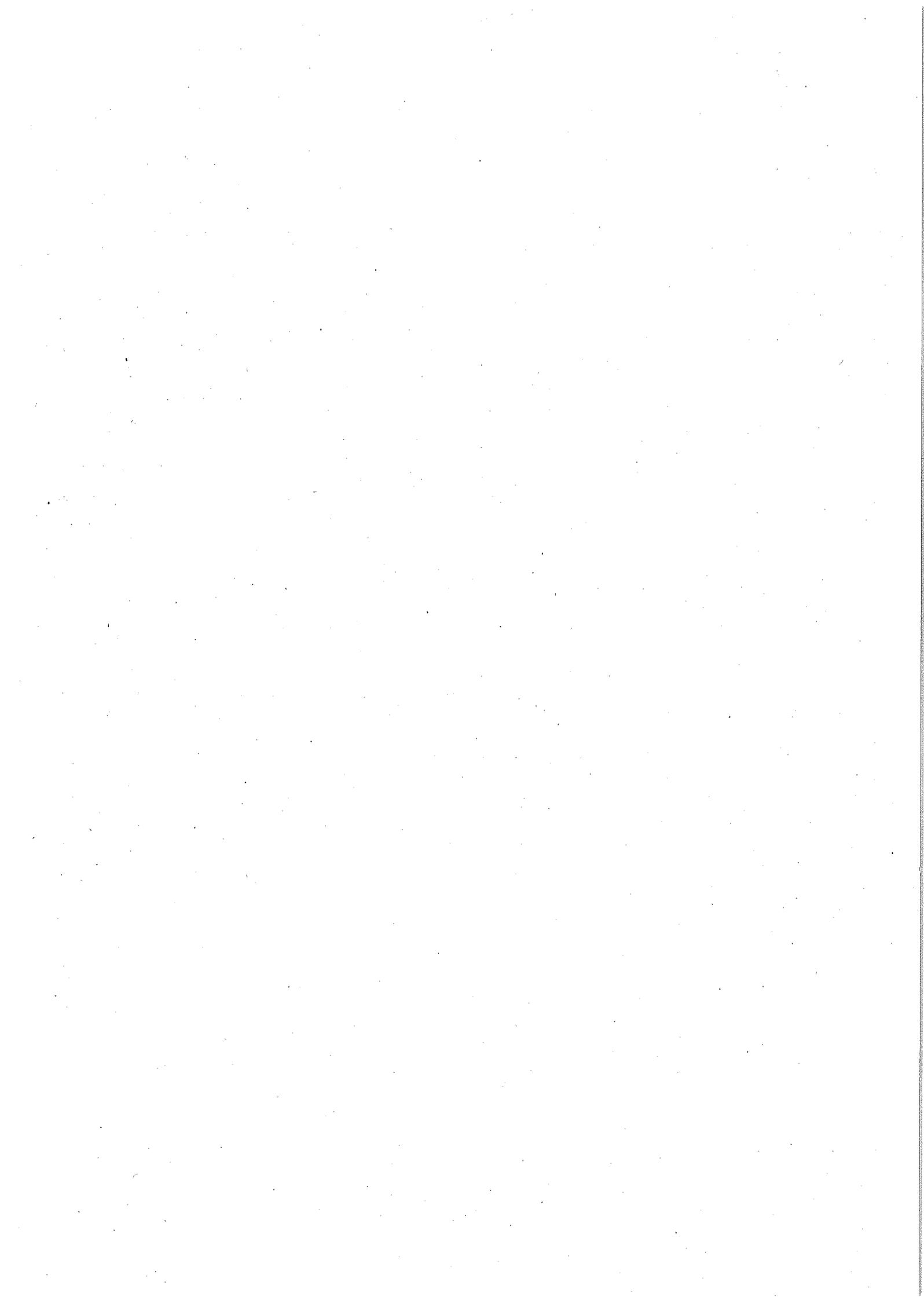
NA

#### 7. Public access to information

NA		
8. Data Protection Impact Assessment - please attach the completed DIA enclosed		
9. Is the publication of this form to be deferred?		
10. If the report is for publication, is redaction required?		
	Yes	No
Of the Decision Note?		<input checked="" type="checkbox"/>
Of the Appendix?		<input checked="" type="checkbox"/>

**ORIGINATING OFFICER DECLARATION:**

<b>Author</b>	Adele Eaton
<b>Signed</b>	
<b>Date</b>	05/10/2021





The purpose of this EIA is to ensure you consider any equality issues as part of your decision making when developing / reviewing your policy / procedure.

Please complete the sections below and send to the Staffordshire Commissioner's Office to be quality assured. New / revised policies cannot be published on the policy database until the EIA has passed the quality assurance process.

<b>Title of policy/procedure:</b>	Staffordshire PSHE Co-ordinator
<b>Department:</b>	Office of the Police, Fire and Crime Commissioner
<b>Date:</b>	22/9/21

### 1. Identify the aims and purpose of the policy

The PFCC will provide funding to SCVYS (Staffordshire Council of Voluntary Youth Services) to host the PSHE Co-ordinator post for Staffordshire.

The post will mirror the work that is taking place in the City to ensure that we have a consistent approach to PSHE delivery across Staffordshire. The Co-ordinator will work with schools and alternative education establishments to develop age appropriate, quality assured, consistent universal and targeted PSHE offer with a particular priority of community safety (e.g. gangs and youth violence, child abuse and exploitation, child criminal exploitation, antisocial behaviour, internet safety personal safety and developing and maintaining healthy and positive relationships including Domestic Abuse).

The approach will comprise universal and targeted elements; universal education for all school-age children (5-16 year olds) and for young people in further/higher education; targeted education for children and young people, delivered to those determined to be more vulnerable / having more risk factors; and targeted input into educational establishments, colleges and universities based on intelligence.

The support available for schools will be to enable PSHE delivery to young people

regardless of their social/ethnic background, learning and physical disabilities, religious beliefs and sexual orientation. SCVYS, through their membership network of 200+ organisations, has a wealth of experience of engaging the most vulnerable young people who may be disadvantaged by a number of factors identified in the EIA.

**2. Identify the individuals and organisations who are likely to have an interest in, or be affected by the policy.**

The approach will provide support and direction for staff delivering PSHE. In addition, will comprise universal and targeted elements; universal education for all school-age children (5-16 year olds) and for young people in further/higher education; targeted education for children and young people, delivered to those determined to be more vulnerable / having more risk factors; and targeted input into educational establishments, colleges and universities based on intelligence.

School staff will also have a greater awareness of the positive activities for young people that run regularly within or close to their school catchment area. These support the earliest help approach enabling access to and participation in community-based provision, and are evidenced through our online map <https://staffscvys.org.uk/activities/>

Another likely benefit to this arrangement is greater levels of opportunity for pupils to participate in programmes such as International partnerships (i.e Bremen Friendship Camp), UK Youth Parliament including its annual Make Your Mark consultation, and the WHAM Plan (low-level youth-led; peer-led mental health support training) which SCVYS facilitates and delivers locally.

The families of those young people who access the support programmes and the communities in which they live are likely to benefit as a result also.

A wide range of partnership organisations will be involved with this work providing holistic support to the young person including: the Local Authorities (Youth Offending Services, Early Help and Social Care Services), other voluntary and community sector services, Department for Work and Pensions/Jobcentre Plus, Fire and Rescue

Service, for example.

Local voluntary youth organisations will also be able to access the quality assured library of resources identified to support the PSHE curriculum, and can be adapted for use in personal and social development programmes delivered via informal education through out-of-school provision.

### **3. Data**

Summarise the findings of any monitoring data / information which you have considered regarding the impact of this policy on people from all or any of the protected groups. This could include national or local data.

#### **3.1 Age**

This is not a protected characteristic that applies. This policy should not have any particular impact on this group

#### **3.2 Disability**

This policy also sets out how work will be differentiated to ensure it is accessible to SEN students.

#### **3.3 Race**

Schools will be supported to take into consideration the views and wishes from the diverse culture in Staffordshire whilst ensuring the needs of the child comes first.

#### **3.4 Religion or Belief**

Within some religions there may be disagreement as to the appropriateness of learning about LGBT+ communities and discussing certain aspects of sex education. Schools will be supported and advice and guidance provided for the need for LGBT+ inclusion and representation and the need to keep young people safe is an essential component of PSHE & RSE provision and is mandated by the Equality Act 2010

#### **3.5 Sex**

We will support schools to make it clear that PSHE content can be actively challenging stereotypes around sex and gender. Students will also learn about consent and how to keep themselves and others safe. The policy outlines how staff

will be provided training on topics such as FGM and forced marriage

### **3.6 Sexual Orientation**

We will support schools with the PSHE content and how we represent LGBT+ people, families and relationships. This is embedded throughout provision which actively challenges homophobic and biphobic viewpoints

### **3.7 Transgender**

We will support schools with the PSHE content and how we represent LGBT+ people, families and relationships. This is embedded throughout provision which actively challenges homophobic and biphobic viewpoints

## **4. Research**

Summarise the findings of any research you have considered regarding this policy for all or any of the protected groups. This could include information you have obtained from other sources e.g. Home Office.

DfE consultation 2019 on PSHE identifies:

There is little evidence that specifically focuses on the effect of the subjects on groups with particular protected characteristics. We can anticipate potential impacts based on knowledge of the impact of other changes and expert opinion, as well as the implementation of the current policy in schools.

### **4.1 Age**

All schools have to meet the requirements of the Equality Act 2010. Therefore, we expect no new discriminatory impact or removal of discrimination in terms of access to the subjects. The new subjects should encourage respect between people in different age groups. Through inclusion of content on the conventions of courtesy and manners, bullying, permission-seeking and giving and through content on how in school and in wider society pupils can expect to be treated with respect by others, and that in turn they should show due respect to others, we expect there to be a positive impact.

### **4.2 Disability**

This protected characteristic covers a wide spectrum of pupils, including those with a variety of learning disabilities, physical disabilities and complex medical needs. The PSHE curriculum is compulsory in all schools, including special schools, alternative provision including pupil referral units and hospital schools. Therefore, young people with a disability will have equal access to the teaching of these subjects and there is no discriminatory impact in terms of access to the subjects.

In order to enable all pupils to access these subjects, schools will need to ensure high-quality differentiated teaching and tailoring of content to pupils with special

educational needs and disabilities, including taking account of any developmental differences relative to other pupils their age.

#### **4.3 Race**

There will be no differential impact on young people from different races or ethnicities beyond the impact discussed under the protected characteristic of religion and beliefs.

#### **4.4 Religion or Belief**

There is no discriminatory impact (a) on religious groups in terms of access to the subjects.

All schools will be required to have regard to the statutory guidance when teaching these subjects. Schools with a religious ethos may choose to reflect that in their policy.

#### **4.5 Sex**

The goal of the PSHE approach is to ensure that the support and advice to schools to deliver the curriculum are equally relevant to male and female pupils. Therefore, the approach does not lead to discrimination in terms of who is required to receive, and will therefore benefit from, the education.

#### **4.6 Sexual Orientation**

All schools have to meet the requirements of the Equality Act 2010. Therefore, we expect no new discriminatory impact or removal of discrimination in terms of access to the subjects.

#### **4.7 Transgender**

Young people with this protected characteristic, or in a family model which includes members with this characteristic, will have equal access to PSHE education therefore, there is no discriminatory impact or removal of discrimination in terms of access to the subjects.

### **5. Consultation**

Summarise the opinions of any consultation for all or any of the protected groups. Who was consulted and how e.g. survey, discussion, forum. If there was no consultation please justify why.

The focus of this piece of consultation work was to ascertain young people's voices regarding PSHE and RSE provisions, as well as issues surrounding their safety in the city of Stoke on Trent. Information was gathered from 9 of the secondary

academies, 2 youth clubs, 1 youth forum and has been included in the report. This equates to approximately 400 young people who live and/or are educated in Stoke on Trent. Consultation findings will be used to implement the approach across Staffordshire.

SCVYS, through their membership network of 200+ organisations, has a wealth of experience of engaging the most vulnerable young people who may be disadvantaged by a number of factors identified in the EIA.

**5.1 Age**

As above

**5.2 Disability**

As above

**5.3 Race**

As above

**5.4 Religion or Belief**

As above

**5.5 Sex**

As above

**5.6 Sexual Orientation**

As above

**5.7 Transgender**

As above

**6. Conclusions**

Taking into account the results of the monitoring, research and consultation, set out how the policy impacts or could impact on people from the following protected groups? (Include positive and/or negative impacts)

**6.1 Age**

The approach will provide support and direction for staff delivering PSHE. In addition, will comprise universal and targeted elements; universal education for all

school-age children (5-16 year olds) and for young people in further/higher education; targeted education for children and young people.

### **6.2 Disability**

The PSHE curriculum is compulsory in all schools, including special schools, alternative provision including pupil referral units and hospital schools. Therefore, young people with a disability will have equal access to the teaching of these subjects and there is no discriminatory impact in terms of access to the subjects.

### **6.3 Race**

Schools will be supported to take into consideration the views and wishes from the diverse culture in Staffordshire whilst ensuring the needs of the child comes first.

### **6.4 Religion or Belief**

Within some religions there may be disagreement as to the appropriateness of learning about LGBT+ communities and discussing certain aspects of sex education. Schools will be supported and advice and guidance provided for the need for LGBT+ inclusion and representation and the need to keep young people safe is an essential component of PSHE & RSE provision and is mandated by the Equality Act 2010

### **6.5 Sex**

We will support schools to make it clear that PSHE content can be actively challenging stereotypes around sex and gender. Students will also learn about consent and how to keep themselves and others safe. The policy outlines how staff will be provided training on topics such as FGM and forced marriage

### **6.6 Sexual Orientation**

As above

### **6.7 Transgender**

As above

## **7. Decisions**

If the policy will have a negative impact on members of one or more of the protected groups, explain how the policy will change or why it is to continue in the same way. If no changes are proposed, the policy needs to be objectively justified.

There will be no negative impact on any of the protected groups as a result of this work.

It is well reported and recognised that PSHE education helps pupils to develop the knowledge, skills and attributes they need to thrive as individuals, family members and members of society. These skills and attributes help pupils to stay healthy, safe and prepare them for life and work. When taught well, PSHE education helps pupils achieve their academic potential, and leave education equipped with skills they will need throughout their later life.

## **8. Monitoring arrangements**

If the policy is new what consideration has been given to piloting the policy?

If monitoring is not already in place what arrangements have been made to monitor the effects of the policy on equality and diversity?

SCVYS will be part of a matrix management arrangement with Commissioners and Education Champion with quarterly meetings monitoring progress. If there are any anomalies in the data or if certain groups appear to be under-represented work will be undertaken to try and remedy this.

**This equality impact assessment will be published on the SC website.**

EIA Form Dated  
01/08/2018



**STAFFORDSHIRE COMMISSIONER**  
Police | Fire and Rescue | Crime

OFFICIAL

# Data Protection Impact Assessment for Staffordshire PSHE Co-ordinator

---

*A Data Protection Impact Assessment (DPIA) is required under the General Data Protection Regulations (GDPR) when there is likely to result in a high risk to individuals. Publication improves transparency and can increase the public's understanding of how their information is used. (Articles 35 and 36 GDPR)*

The DPIA guidance should be read in conjunction with the completion of this DPIA.

Upon completion of the DPIA template the Project Manager and IAO will review, sign off and send a copy to the Data Protection Officer for advice. The DPIA will then be considered and signed off by the Senior Information Risk Officer (SIRO). The SIRO may at this point ask that additional work is carried out or may decline the proposal and not accept any risks identified.

If the DPIA identifies a high risk and measures cannot be undertaken to reduce the risk then there is a requirement for the Data Protection Officer to consult with the Information Commissioner's Office (ICO).

This DPIA should be filled out at the beginning of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into the project plan.

Should you have any queries in relation to the Data Protection Impact Assessment Process then please contact the Data Protection Officer.

**DOCUMENT CONTROL**

<b>System Owner</b>	<b>Business Lead</b>	<b>Information Asset Owner</b>	<b>Project Manager</b>
	Adele Eaton		Paula Hammond

<b>Author</b>	<b>Role</b>	<b>Department</b>
Adele Eaton	Programme Lead Prevention and Early Intervention	Commissioning and Partnerships

<b>Version</b>	<b>Version date</b>	<b>Requester of change</b>	<b>Summary of change(s)</b>
1	22/9/2021	New document	None
	05/10/2021	Data Protection Officer 	DPO Signature

## Screening Questionnaire

The following questions are intended to help you decide whether a DPIA is necessary. The DPIA guidance document will assist you during the project lifecycle. Answering 'yes' to any of the following screening questions is an indication that a DPIA is required.

You can expand on your answers as the project develops.

**If there is no personal data involved then go to Section 8 – Conclusions.**

*"Personal data" means any information relating to an identified or identifiable living individual - Section 3(2) of the Data Protection Act 2018.*

Does the intended processing of personal information involve any of the following?

	<b>Intended processing</b>	<b>Yes</b>	<b>No</b>
1.	Systematic and extensive profiling with significant effects?		X
2.	Large scale use of sensitive data?		X
3.	Public monitoring?		X
4.	New technologies (processing involving the use of new technologies, or the novel application of existing technologies (including AI)?		X
5.	Denial of service: decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data?		X
6.	Large-scale profiling: any profiling of individuals on a large scale?		X
7.	Biometrics: any processing of biometric data?		X
8.	Genetic data: any processing of genetic data?		X
9.	Data matching: combining, comparing or matching personal data obtained from multiple sources.		X
10.	Invisible processing: processing of personal data that has not been obtained direct form the data subject in circumstances where the data controller considers that compliance with Article 14 of the GDPR would prove impossible or involve disproportionate effort.		X
11.	Tracking: processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.		X
12.	Targeting of children or other vulnerable individuals: the use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if there is an intention to offer online services directly to children.		X
13.	Risk of physical harm: where the processing is of such a nature that a personal data breach could jeopardise the physical health or safety of individuals.		X
14.	Any other processing which is large scale involves profiling or monitoring, decides on access to services or opportunities or involves sensitive data or vulnerable individuals.		X

## Step 1 – Identify the need for a DPIA

Explain broadly what the 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.

## 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 another way of describing data flows. What types of processing identified as likely high risk are involved?

**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?

**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)?

**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?

### 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?

### 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?

**Step 5: Identify and assess risks**

<b>Describe the source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk score</b>
	Remote, possible or probable	Minimal, significant or severe	

**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 score	Measure approved
		Eliminated, reduced or accepted		Yes/no

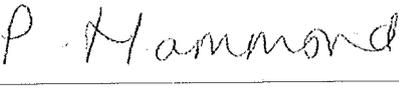
**Step 7: Sign off and record outcomes**

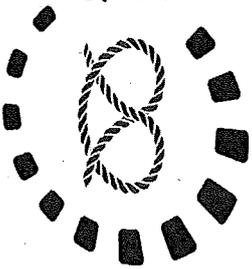
<b>Item</b>	<b>Name/date</b>	<b>Notes</b>
<b>Measures approved by:</b>		Integrate actions back into project plan, with date and responsibility for completion
<b>Residual risks approved by:</b>		If accepting any residual high risk, consult the ICO before going ahead
<b>DPO advice provided:</b>		HIA should advise on compliance, step 6 measures and whether processing can proceed
<b>Summary of DPO advice:</b>		
<b>DPO advice accepted or overruled by:</b>		If overruled, you must explain your reasons
<b>Comments:</b>		
<b>Consultation responses reviewed by:</b>		If your decision departs from individuals' views, you must explain your reasons
<b>Comments:</b>		
<b>This DPIA will be kept under review by:</b>		The DPO should also review ongoing compliance with DPIA

## Step 8 - Conclusions

**Please provide a summary of the conclusions that have been reached in relation to this projects overall compliance with the DPA. If screening did not require a DPIA please state the reason below and attach a copy of this form to project/contract documentation.**

*After consideration of the screening questionnaire it has been determined that a DPIA is not required.*

Sign-Off Authority	Role	Date	Signature
	Project Manager	22/9/21	
	Information Asset Owner	22/9/21	
	Data Protection Officer	05/10/21	
	Senior Information Risk Owner (SIRO)	07/10/21	



# STAFFORDSHIRE COMMISSIONER

Police | Fire and Rescue | Crime

OFFICIAL

## Appendix A – Calculation of Risk

### 9.1 Data Protection Principles

#### 1. Fair and Lawful

- Do you need to create or amend a privacy notice?
- If processing on the basis of consent, how will this be collected and recorded?

#### 2. Purpose Limitation

- Does the processing actually achieve your purpose?
- Will the data be used for another purpose?
- How will you prevent function creep?

#### 3. Data Minimisation

- Will you only process the data needed for your purpose?
- How will you ensure and maintain data quality?

#### 4. Accuracy

- How will you ensure data can be corrected or amended?
- Will you ensure data is accurate and up to date?

#### 5. Retention

- Do you have a review, retention and disposal policy?
- Can data be deleted/erased from all Staffordshire Police systems if required?
- Is the retention period necessary and proportionate?

#### 6. Security

- What technical and organisational measures are in place to protect data?
- How will you protect against unauthorised access, alteration or removal of data?
- What training and guidance will be given to staff?
- How would you identify and manage a breach?
- How will systems be tested?

#### 7. Data Subject Rights

- If an individual wishes to exercise their rights, including requesting access to data, or asking for data to be corrected, amended, restricted or deleted then you must have procedures in place to recognise such a request and refer it to the DPO.

Describe the source of risk and the nature of potential impact on individuals, include associated organisation/corporate risk and compliance risk	Likelihood of harm	Severity of harm	Initial Risk	Mitigation/ Solution	Result	Residual Risk
	1 - Highly unlikely 2 - Unlikely 3 - Possible 4 - Likely 5 - Highly likely	1 - Negligible 2 - Minor 3 - Significant 4 - Major 5 - Severe	Very High High Medium Low Very Low	Describe the mitigation and whether it will be implemented	Is the risk: - Eliminated - Reduced - Accepted	Very High High Medium Low Very Low



**Likelihood score**

Score	Probability	Timeframe	Description
	%		
1. Highly unlikely	0 to 5% chance	1 in 10 years or more	Not foreseen to occur
2. Unlikely	>5 to 10% chance	1 in 5 years	May occur in exceptional circumstances
3. Possible	>10 to 20% chance	1 in 1 year	Realistic chance of occurring
4. Likely	>20 to 50% chance	1 in 6 months	Will probably occur
5. Highly Likely	>50% chance	1 in 3 months or less	Expected to occur or occurs regularly

**Impact Score**

Score	Financial/other enablers	Operational	Public Confidence/Reputational
1. Negligible	0 to <0.1% of budget/cost savings and / or Negligible impact on modern policing key activity delivery	0 to 0.5% shift in key: <ul style="list-style-type: none"> <li>1. Early Intervention measures</li> <li>2. Supporting victims and witness measures</li> <li>3. Managing offenders measures and/or</li> </ul> Negligible impact on key operational activity delivery	0 to 0.5% shift in: <ul style="list-style-type: none"> <li>1. Levels of Satisfaction</li> <li>2. Feelings of safety</li> <li>3. Fair and respectful treatment and/or Low level localised media interest and/or</li> </ul> Minor impact on key public confidence activity delivery

<p>2. Minor</p>	<p>&gt;0.1 to 0.5% of budget/cost savings and/or Minor impact on modern policing key activity delivery</p>	<p>&gt;0.5 to 2.5% shift in key:                      1. Early Intervention measures                      2. Supporting victims and witness measures                      3. Managing offenders measures and/or                      Minor impact on key operational activity delivery</p>	<p>&gt;0.5 to 2.5% shift in:                      1. Levels of Satisfaction                      2. Feelings of safety                      3. Fair and respectful treatment and/or                      No external reputational impact and/or                      Negligible impact on key public confidence activity delivery</p>
<p>3. Significant</p>	<p>&gt;0.5 to 2% of budget/cost savings and/or Significant impact on modern policing key activity delivery</p>	<p>&gt;0.25 to 5% shift in key:                      1. Early Intervention measures                      2. Supporting victims and witness measures                      3. Managing offenders measures and/or                      Significant impact on key operational activity delivery</p>	<p>&gt;0.25 to 5% shift in:                      1. Levels of Satisfaction                      2. Feelings of safety                      3. Fair and respectful treatment and/or                      Some negative regional media coverage or public/political concern and/or                      Significant impact on key public confidence activity delivery</p>

4. Major	<p>&gt;2 to 4% of budget/cost savings and/or Major impact on modern policing key activity delivery</p>	<p>&gt;5 to 10% shift in key:</p> <ol style="list-style-type: none"> <li>1. Early Intervention measures</li> <li>2. Supporting victims and witness measures</li> <li>3. Managing offenders measures and/or</li> </ol> <p>Major impact on key operational activity delivery</p>	<p>&gt;5 to 10% shift in:</p> <ol style="list-style-type: none"> <li>1. Levels of Satisfaction</li> <li>2. Feelings of safety</li> <li>3. Fair and respectful treatment and/or</li> </ol> <p>1. Long term regional media coverage or public/political concern 2. Limited national media coverage or public/political concern and/or</p> <p>Major impact on key public confidence activity delivery</p>
5. Severe	<p>&gt;4% of budget/cost savings and/or Severe impact on modern policing key activity delivery</p>	<p>&gt;10% shift in key:</p> <ol style="list-style-type: none"> <li>1. Early Intervention measures</li> <li>2. Supporting victims and witness measures</li> <li>3. Managing offenders measures and/or</li> </ol> <p>Severe impact on key operational activity delivery</p>	<p>&gt;10% shift in:</p> <ol style="list-style-type: none"> <li>1. Levels of Satisfaction</li> <li>2. Feelings of safety</li> <li>3. Fair and respectful treatment and/or</li> </ol> <p>1. Loss of credibility in organisation 2. International media coverage 3. Public enquiry and/or</p> <p>Severe impact on key public confidence activity delivery</p>

