

## Decision Note – Pan Staffordshire Domestic Abuse Victim and Perpetrator services



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

### REQUEST FOR DECISION BY THE STAFFORDSHIRE COMMISSIONER

	Policing:	Crime:	Fire & Rescue:
<b>This decision relates to:</b>  <b>The re-commissioning of pan Staffordshire Domestic Abuse Victim and Perpetrator services</b>	X	X	

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

**Rationale for approval**

**STAFFORDSHIRE COMMISSIONER**

**Signature**

DocuSigned by:

*Ben Adams*

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**Date** 16 August 2023

Date decision required by:

If an urgent approval is required, please state reasons:

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

Decision Number: SCP/D/202324/007

Date Received: 16 August 2023

	Yes	No
Has the required decision been considered under the guidance of the Staffordshire Commissioner's Decision Making Policy?	x	
Has the required decision been deemed to be a Key Decision as defined within the Staffordshire Commissioner's Decision Making Policy?	x	
Who is empowered to make the required decision?		
<b>Staffordshire Police, Fire and Crime Commissioner</b>		

Title	Re-commissioning of pan Staffordshire Domestic Abuse Victim and Perpetrator Services
<p><b>Summary:</b></p> <p>Domestic Abuse (DA) is recognised as an issue both nationally and locally due to both its prevalence and also the significant impact it has on individuals, families and communities.</p> <p>In 2018, the Staffordshire Commissioner's Office agreed with Staffordshire County Council and Stoke-on-Trent City Council to jointly commission pan Staffordshire Domestic Abuse Victim and Perpetrator services (Decision Form OPCC/201819/02) and which operated from 1 October 2018 to 30 September 2021 and which were subsequently extended to operate for a further two year period to 30 September 2023.</p> <p>With the further commitment of Staffordshire Commissioner's Office, Staffordshire County and Stoke-on-Trent City Councils to jointly re-commission DA Victim and Perpetrator services to operate from 1 October 2023 for a three year period, followed by a potential to extend for a further two, one year periods, work to procure new services began in earnest in 2021.</p>	

A refreshed Domestic Abuse Needs Assessment (DANA) in 2021, supplementing that undertaken in 2016 was completed, and subsequently in 2022, both a stakeholder and two market engagement events were undertaken.

A comprehensive service specification writing team comprising members of the Staffordshire Commissioners Office, Staffordshire County Council, Stoke-on-Trent City Council, Staffordshire Police and Safeguarding defined the requirements and a formal tender exercise began with the publishing of the Tender on 1<sup>st</sup> February 2023.

A procurement exercise then followed, led by Staffordshire Police Procurement Unit and following an extensive process, a decision was reached to award two contracts, being

- Lot A: DA Victim services to Victim Support, and
- Lot B: DA Perpetrator services to Victim Support.

New contracts will commence on 1 October 2023.

### **Recommendation:**

Recommendation is to support the award of the Domestic Abuse Contracts to the successful bidder for each lot;

- Lot A Victim Services – Victim Support
- Lot B Perpetrator Services – Victim Support

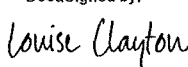
Approval required in support of the contracts to be awarded by the Police, Fire and Crime Commissioner.

### **Chief Executive**

I hereby approve the recommendation for consideration.

Signature

Date

DocuSigned by:  
  
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15 August 2023

## REPORT AND ADVICE TO THE STAFFORDSHIRE COMMISSIONER

### 1. Introduction and background

Tackling and ending Domestic Abuse (DA) is a long-term national and international priority, enforced in the United Kingdom (UK) by developments in law and legislation such as the Domestic Abuse Act (2021) and the on-going UK Government 'Tackling Violence Against Women and Girls' (2021) strategy.

Any person aged 16 or over can potentially become a victim of Domestic Abuse (DA): people can become victims regardless of gender, ethnicity, sexuality, disability, where they live, or their socio-economic status or background.

**Domestic abuse includes:** "any incident or pattern of incidents between those aged 16 or over who are personally connected and the behavior is abusive. The abuse can encompass, physical or sexual abuse, violent or threatening behavior, controlling or coercive behavior, economic, psychological, and emotional or other abuse" (Domestic Abuse Act 2021).

#### National Context

The Crime Survey of England and Wales (CSEW) suggests that the majority of DA remains largely hidden and is consistently underreported to the police and other agencies.

In reviewing the CSEW, the Home Office Domestic Abuse Statutory Guidance (July 2022) estimates that for the year ending March 2020, 2.3m adults aged 16 to 74 years had experienced DA during the previous year. The guidance further reports that between 2019 and 2020, approximately 1 in 15 children under the age of 17 years live in households where a parent is a victim of DA and that nationally, police recorded over 1.5m DA related incidents and crimes in England and Wales in the year ending March 2021, an increase of 6% from the previous year.

Whilst men and women can be affected by DA, females are disproportionately the victims. The latest CSEW data for the year ending March 2020 estimates that 1.6m females and 757,000 males aged 16 to 74 experienced DA the previous year. According to this data, around one in four women aged 16 to 74 had been a victim of DA in their lifetime compared with around one in seven men.

The Official of National Statistics (ONS) Data (March 2020) for the period March 2018 – March 2020 showed that 276 women were victims of domestic homicide and in 97% of cases, the suspect was male. Over the same period 86 men were killed in domestic homicides. In 62% of these cases the suspected perpetrator was male and in 38%, the suspect was female.

Socio-economic costs of DA are estimated to be in the region of £66bn for victims identified in England and Wales within the year 2016-2017 with physical and emotional harms estimated to account for the overwhelming majority of the overall costs.

#### Current Services in place to 30 September 2023

In 2016-2018, the Staffordshire Commissioner led the commissioning of pan Staffordshire Domestic Abuse (DA) services, jointly funded and supported by Staffordshire County and Stoke-on-Trent City Councils. Services are available for adults and children, victims, families, businesses, communities

and stakeholders and support is available for perpetrators recognising and wanting to change their abusive behaviour.

Operating under the brand 'New Era', confidential help is available free of charge for anyone residing in Staffordshire and Stoke-on-Trent.

Current commissioned services began in October 2018 with contracts originally awarded for a three year period and subsequently extended in 2021 for a further two years, operating until 30 September 2023.

The current provider of the Victim service is Victim Support, with the provider of the Perpetrator service being the National Probation Service (NPS). (Of note is that with a focus on statutory service provision from September 2023, the NPS took the decision that they would not tender for new services from October 2023).

Since 2018, almost 30,000 referrals have been made to the New Era Victim helpline, with almost 19,000 adults and 3,300 children provided with dedicated support and help to move on to live safe, fulfilling lives (1/10/2018 – 31/3/23).

During the same period, almost 2,000 referrals have been made to the New Era Perpetrator support service with 682 adults and 168 children provided with help to change their behaviour (figures 1/10/2018 – 31/3/23).

### **Staffordshire-wide DA recommissioning from 1 October 2023**

Strategic dialogue with Staffordshire County and Stoke-on-Trent City Councils confirmed willingness and intention to continue the successful co-commissioning arrangements for those affected by DA. To support this partnership arrangement, a new tri-partite agreement is under development and will provide the foundation to co-fund pan Staffordshire DA Victim and Perpetrator services for a further three year period, with opportunity to extend for a two additional one year periods, with contracts commencing on 1 October 2023.

### **Understanding Need**

To support the recommissioning of DA services, a refresh of the DANA for Staffordshire and Stoke-on-Trent was completed in 2021, (DANA 2021) which recognised:

- The number of DA cases visible to services is rising and unlikely to fall;
- In Staffordshire & Stoke-on-Trent in 2019-20, it was estimated there were 45,080 victims of domestic abuse; 66% of which (29,950) were women, and 33% (14,920) were male;
- In 2020-2021 Staffordshire Police recorded a total of 28,196 domestic-related crimes and incidents; of which 16,742 were recorded as crime, and 11,454 were recorded as non-crime incidents (2% increase on 2019-2020);
- DA overall remains largely under-reported, with an estimated 65% of all cases not coming into contact with any support services or the criminal justice system;
- It appears that the visibility of DA in Staffordshire and Stoke-on-Trent is similar to national levels;
- DA exists in every part of Staffordshire and Stoke-on-Trent - the highest prevalence is Stoke-on-Trent, Newcastle, Cannock and Tamworth;
- Anyone can be a victim of DA; however, young women in lower-income urban areas are significantly over-represented in both police recorded DA and service user cohorts;

- Children are believed to be present at just over a third (35%) of all Police-recorded domestic crimes and incidents overall, which includes around 2-out-5 (42%) present in domestic crimes;
- At least 5,200 victims received support from commissioned and non-commissioned specialist DA services in 2019-20; at least a third of all known local DA cases;
- Whilst difficult to compare, the cohort receiving support in 2019-20 is a little over double the approximate 2,400 cases identified in 2015-16;
- DA service providers reported a 36% increase in calls for support in the 12 months to July 2021, compared to the previous 12 months. Referrals were reported as higher risk and greater complexity;
- There have been increases in male victims accessing support; in 2016 approximately 4% of the provider cohort were male, compared to 15% presently;
- Three in four victims accessing services have children living with them, and half of these have more than one child living in the home);
- Victims are positive about support services in Staffordshire and Stoke-on-Trent. Around half are leaving support services in a managed way, around a fifth do not engage, and approximately 1-in-10 disengage (in an unplanned way) feeling that they no longer require support;
- While Stalking accounts for a small proportion of all DA-related offences (4%) overall, almost 3 in 4 recorded stalking offences (73%) are the result of DA;
- Anyone can be a victim of HBA; however, police data suggests that victims are most likely to be younger women of Asian ethnicity. Where HBA does occur, it is twice as likely as DA to have been a more serious violent crime with injury;
- While men are less likely than women to be victims of DA Stalking or DA Sexual Offences, they are also highly unlikely to report these or seek help when they occur;
- Overall, victims who are men and victims who live in rural areas (particularly older adults) are less likely to report DA;
- The reporting of DA amongst LGBTQ+ victims is low; it should be considered that LGBTQ+ victims are also less likely to report DA;
- There is high demand for mental health support amongst DA particularly trauma support;
- Around a quarter of victims (25%) still have contact with the perpetrator after they have completed their programme of support;
- Around 1-in-25 victims of DA live in Safe Accommodation at the time they receive support. However, it is estimated that closer to 2-in-5 are living in some form of non-permanent/short-term accommodation (incl. sofa-surfing, staying with friends or family);
- The levels of FM incidents and FGM incidents in Staffordshire and Stoke-on-Trent are low in number;
- The majority of the 10,300 recorded local DA perpetrators are men (75%) and the minority women (25%);

The DANA also gave due consideration to the local authority Statutory Duty under the DA Act 2021 to commission Safe Accommodation services, with an aligned Safe Accommodation Needs Assessment (SANA 2021) was produced to support this separate, local authority led activity.

By way of context and provided for information, the more recently produced DA Performance Framework supporting the DA Commissioning and Development Board (June 2023) identified that DA crimes reported to Staffordshire Police have increased by 8% compared to the previous 12 months, and 24% when compared to the pre-COVID baseline, with local upturn in line with a national increasing trend.

Findings from the DANA 2021 were combined with information from comprehensive stakeholder and market engagement activity. All involved contributions and feedback from other Commissioners, subject experts, service providers, key partners and also victim and perpetrator service users.

This information, together with the knowledge, learnings and experience of the last four years' service provision enabled the development of a new DA Service Specification by a multi-agency working group comprising the SCO, Staffordshire County and Stoke-on-Trent City Councils, Staffordshire Police and Safeguarding.

### **Scope of new services**

Service provision for those affected by DA will be based on the strong foundations established in 2018 and will continue to be provided for both Lot A Victim and Lot B Perpetrator services:

- Tier 1 – Prevention (including education, awareness raising and training for professionals and businesses);
- Tier 2 – Early Intervention;
- Tiers 3 & 4 – Targeted and Acute Support;
- Integrated Support Service (ISS) within the Victim service, bridging both services;
- Comprehensive number of Independent Domestic Violence Advisors (IDVA) posts within the Victim service, including specialist IDVA's for Males, LGBTQ+, BAME, Older Victims, Disability IDVA, Court Based IDVA and a Safe Accommodation IDVA – noting that services follow the person, regardless of tenure.

New developments from 2023 will include:

- A formal Children's Neutral Front Door, with all children routed through a neutral portal, ensuring those with learnt behaviour are appropriately supported within either the victim or perpetrator service based on risk assessment, and children are not stigmatised from learnt behaviour;
- Prevention activity specifically led by the Victim Service;
- A new standard risk, voluntary Early Intervention perpetrator programme comprising 3 sessions for those individuals recognising their own very early signs of inappropriate behaviour;
- A formal Service Level Agreement between community based services and safe accommodation services, to ensure joined up support for those in safe accommodation settings.

### **Financial**

In collaboration, the SCO, Staffordshire County Council and Stoke-on-Trent City Council have agreed to let the two DA contracts on an initial term of three years, with an option to extend for further two, one year periods, with financial arrangements defined under a tri-partite agreement held between the three commissioning organisations.

The total annual contract value is £3,375,221 and is split:

- Victim Service £2,875,221 pa
- Perpetrator Service £500,000 pa

Contributions to the overall contract values from Commissioning partners is as follows:

- Staffordshire Commissioner's Office £1,859,195.76
- Staffordshire County Council £895,000 pa
- Stoke-on-Trent City Council £621,025.24

#### Contract Award

The DA Tender opportunity was issued on 1 February 2023 with a deadline for responses at 28th March 2023.

A multi-agency panel of evaluators comprising the SCO, Staffordshire County Council, Stoke-on-Trent City Council and Safeguarding considered the bid submissions received, one for the Victim service and two for the Perpetrator service.

Assessment of bids was undertaken through a written Quality submission, an Interview process and a Value for Money submission.

Following comprehensive evaluation and assessment, the winning tenders were secured from:

- Lot A Victim Services – Victim Support
- Lot B Perpetrator Services – Victim Support

## 2. Issues for consideration

Due to the proposed value of the contract an above threshold tender was undertaken to contract for the services under 2 lots, this ensured compliance with the Public Contract Regulations 2015 and the Authorities Contract standing orders.

Following publication of the statutory Prior Indicative Notice (PIN), a stakeholder engagement event (September 2022), and also two market engagement events took place (September and November 2022). Publication was also undertaken via the internet on LinkedIn.

All details relating to the market engagement were published via the message facility of the E-Tendering Portal which would be available to prospective suppliers regardless of whether the entity attended and engagement event or not.

### Tender Stage

Following publication of the ITT on 1 February 2023, potential bidder were able to view all procurement documentation with the closing date for bid submissions for both tender opportunities set at 28 March 2023.

One (1) submission was received for Lot A and two (2) submissions for Lot B.

A Selection Questionnaire (SQ) phase was undertaken as part of the light touch regime which all bidders passed.

Each bidder submitted two years of audited annual accounts, which were reviewed by the Chief Accountant. In accordance with the terms of the Invitation to Tender (ITT), a financial report was undertaken for each Tenderer using a qualified independent third party to determine the Tenderer's Commercial Delphi Score.

All bidders met the requirements.

## Evaluation

### Outcome of evaluation

#### **Lot A – Victim Services**

The overall result for LOT A resulted in Victim Support being the winning bidder, with a total evaluated score of 97%.

Bidder	Value for Money Weighted	Presentation Weighted	Total
	%	%	%
Victim Support	85	12	97.00

#### **Lot B – Perpetrator Services**

The overall result for LOT B resulted in Victim Support being the winning bidder with a total evaluated score of 95.50%.

Bidder	Value for Money Weighted	Presentation Weighted	Total
	%	%	%
Victim Support	85.00	10.5	95.50

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

The DANA 2021 recognised the demands being faced from DA both nationally and locally. The three commissioning partner agencies, the SCO, Staffordshire County and Stoke-on-Trent City Councils have considered this, together with the performance of the current commissioned services against other models of service operating outside of the geography.

The approach taken by Staffordshire-wide DA Commissioners is considered by many other geographies as an excellent example of partnership working, delivering consistent, flexible and dynamic services for all those affected by DA whilst at the same time evidencing positive outcomes and value for money. Investment in prevention and early intervention activity and perpetrator rehabilitation alongside dedicated community support, aligned as appropriate with safe accommodation support is encouraging victims and their families to come forward and seek support, aligning well with the direction and delivery of local and national strategies and plans.

On this basis, the decision to continue to develop the strong foundations built over the last few years, with due regard to future opportunities and legislative changes was unanimous.

#### 4. Consultation and Engagement undertaken

As part of the DA re-commissioning process, DA Commissioners undertook a wealth of consultation and engagement with a range of stakeholders.

- This has included Victim and Perpetrator Service User feedback, through consultation forming part of the DANA 2021;
- Incumbent Provider Engagement Events held on 23 September 2022;
- Stakeholder Market Engagement Event on 23 September 2022;
- Market Engagement Events on 30 September and 3 November 2022;
- Engagement with nationally recognised leads, Safe Lives and Respect;
- Dialogue at a range of governance meetings, including the Domestic Abuse Commissioning and Development Board and associated Delivery Groups, the Victims and Witnesses Commissioning and Development Board, the Community Safety Strategic Board, County and City strategic governance forums and with individual departments and functions within each of the commissioning local authority partners.

#### Report Implications

#### 5. Monitoring Officer comments:

A robust commissioning exercise has been undertaken.

Signature

DocuSigned by:

*Louise Clayton*

Date

17 August 2023

#### 6. Section 151 Officer comments:

I echo the comments of the Monitoring Officer. The funding has been made available for this contract and is contained within existing budgets and earmarked reserves.

Signature

DocuSigned by:

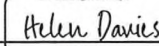
*David Greensmith*

Date

17 August 2023

	Yes	No
Has legal advice (outside of that provided by the Monitoring Officer) been sought on the content of this report?		
<b>7. Legal Comments:</b>  Legal support was received throughout the tender process with all published documents checked for compliance. The legal support was received from Joint Legal Services and an external law firm appointed to support.		
<b>8. Equality Comments – please attach the completed EIA</b>  Attached		
<b>9. Background/supporting paper</b>		
<b>Please answer the following questions</b>	<b>Yes</b>	<b>No</b>
<b>10. Public access to information?</b>		
<b>11. Does this decision involve the processing of personal data? (If yes please attach a completed Data Impact Assessment)</b>	X	
<b>12. Is the publication of this form to be deferred? (If yes approx. how long?)</b> Until after the publication of the contract award. This will be after 1 <sup>st</sup> July 2023. Commercial Services to confirm when complete.	X	
<b>13. Does this form contain commercial or operationally sensitive information which is to be redacted? (If yes, please provide details with the submission of this note)</b> Final decision report will need to be reviewed for commercially sensitive information which would need to be redacted prior to publishing.	X	

**14. ORIGINATING OFFICER DECLARATION:**

<b>Author</b>	Helen Davies
<b>Signed</b>	DocuSigned by: 
<b>Date</b>	A99D956D22DC412... 15 August 2023



## Equality Impact Assessment



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

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>	Procurement of pan Staffordshire Domestic Abuse services
<b>Department:</b>	Commissioning and Partnerships
<b>Date:</b>	6/12/22

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

To re-commission pan Staffordshire services for all those affected by domestic abuse, maintaining a consistent, coherent and co-ordinated approach through tiers of support, from prevention and early intervention through to targeted and acute support.

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

- The Staffordshire Commissioner's Office, Police, Fire and Rescue and Crime (Lead Commissioner);
- Staffordshire County Council (Co-Commissioner);
- Stoke-on-Trent City Council (Co-Commissioner);
- Local Stakeholders;
- National DA organisations;
- Local Domestic Abuse (DA) service provider/s;

Not Protectively Marked

- Victims and Perpetrators of Domestic Abuse;
- Those affected by Domestic Abuse.

### 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. Data

#### Local Context

- In the period 1/4/19 – 31/3/20, Staffordshire Police recorded a total of 28,196 domestic related crimes and incidents. By applying the Crime Survey of England and Wales estimated DA prevalence to the latest (2019) mid-year population estimate (Office of National Statistics) for Staffordshire and Stoke-on-Trent, it is possible to estimate that in 2019-20, there were 45,080 victims of DA locally, 66% of which were women and 33% were male. Under-reporting of DA locally and indeed nationally is recognised as significant.
- Local data which shows 71% of victims of DA are female and 29% are male is broadly similar to national data.
- 28% of recorded DA victims in Staffordshire and Stoke-on-Trent are aged between 18 and 29 years, and to a lesser extent, 23% are aged 30-39 years.
- Male victims tend to be less polarized towards a single age group with those aged 18-29 years (6% of all DA), those aged 30-39 years (6%) and those aged 40-49 years (5%) all similarly likely to be affected by DA.
- Whilst referrals into DA services were fairly consistent across the geography prior to the pandemic (2019-2020), they increased drastically after April 2020 (first full month under lockdown restrictions) and in July 2021, compared to July 2020, referrals for support for victims of DA increased by over 36%.
- More latterly in the year to October 2022, referrals now see a 20% increase compared to the year to March 2020 with current levels perceived to be the new norm.
- Children are believed to be present at just over a third (35%) of all police recorded domestic crimes.
- Data evidences that anyone can be a victim of DA regardless of any personal or protected characteristics; however, young women in lower-income urban areas are significantly over-represented in police recorded DA and service user cohorts.
- Data also evidences that anyone can be a victim of Honour Based Abuse (HBA) regardless of any personal or protected characteristics; however whilst there are male victims of HBA and victims of White European ethnicities, police data suggests victims are most likely to be younger women of Asian ethnicity.

- Male and female victims tend to have different experiences of DA and there is a difference in levels of reporting of DA crime depending on gender. While men are less likely than women to be victims of DA Stalking or DA Sexual Offences, they are also highly unlikely to report these when they occur.
- Overall victims we are men and victims who live in rural areas (particularly older adults) are less likely to report DA.
- It is not possible to quantify how much DA is known and how much is hidden amongst LGBTQ+ victims. This knowledge gap implies that the reporting of DA amongst LGBTQ+ victims is low and that it should be considered that these victims are also less likely to report DA.
- Locally the gender split of perpetrators is the inverse of victims, where the majority of the 10,300 recorded perpetrators are men (75%), and the minority women (25%).
- Women are disproportionately repeat victims of DA and men are disproportionately repeat perpetrators.
- 25% of all DA perpetrators are male aged 18-29 years and to a fractionally lesser extent 24% are aged 30-39 years. Female perpetrators are polarized towards these age groups with 8% of all perpetrators females aged 18-29 years and 7% females aged 30-39 years.
- Ethnicity of perpetrators remains reflective of the Staffordshire and Stoke-on-Trent population overall, with around 7% of DA perpetrators of BAME ethnicity with 93% white.

### **3.2 Disability**

This policy will not discriminate against disability. The service is available to all, regardless of ability.

### **3.3 Race**

This policy will not discriminate against race. The service is available to all, regardless of race.

### **3.4 Religion or Belief**

This policy will not discriminate against religions or beliefs. The service is available to all, regardless of religion or belief.

### **3.5 Sex**

This policy will not discriminate against sex. The service is available to all, regardless of sex.

### **3.6 Sexual Orientation**

This policy will not discriminate against sexual orientation. The service is available all, regardless of sexual orientation.

### **3.7 Transgender**

This policy will not discriminate against transgender. The service is available to all.

## **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.

### **4.1 Age**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
- Govt. Tackling DA Plan March 2022;
- Office of the DA Commissioner for England and Wales Considerations April 2021;
- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

### **4.2 Disability**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
- Govt Tackling DA Plan March 2022;
- Office of the DA Commissioner for England and Wales Considerations April 2021;
- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

#### **4.3 Race**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
- Govt Tackling DA Plan March 2022;
- Office of the DA Commissioner for England and Wales Considerations April 2021;
- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

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

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
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- National Statement of Expectations for DA 27 July 2022;

- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

#### **4.5 Sex**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
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- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

#### **4.6 Sexual Orientation**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;
- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
- Govt Tackling DA Plan March 2022;
- Office of the DA Commissioner for England and Wales Considerations April 2021;
- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

#### **4.7 Transgender**

- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Safe Accommodation Needs Assessment 2021;
- Staffordshire and Stoke-on-Trent Domestic Abuse Needs Assessment 2016;

- DA Act 2021;
- Govt. Tackling Violence Against Women and Girls Strategy July 2021;
- HO Violence against women and Girls Services Commissioning Toolkit March 2022;
- Govt Tackling DA Plan March 2022;
- Office of the DA Commissioner for England and Wales Considerations April 2021;
- National Statement of Expectations for DA 27 July 2022;
- Strategic Direction for SA and DA services 2018-2023 NHS;
- Victims Funding Strategy May 2022;
- DA Commissioner Patchwork of Provision Policy Report 2022.

## 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.

### 5.1 Age

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### 5.2 Disability

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### 5.3 Race

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### 5.4 Religion or Belief

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement

with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### **5.5 Sex**

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### **5.6 Sexual Orientation**

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

### **5.7 Transgender**

Inclusive consultation was undertaken as part of the Domestic Abuse Needs Assessment 2021 for Staffordshire and Stoke-on-Trent. This included engagement with service users, stakeholders and the market place. The service is recognised as being available to all in need of support.

## **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 policy is all inclusive.

### **6.2 Disability**

The policy is all inclusive.

### **6.3 Race**

The policy is all inclusive.

### **6.4 Religion or Belief**

The policy is all inclusive.

<b>6.5 Sex</b>
The policy is all inclusive.
<b>6.6 Sexual Orientation</b>
The policy is all inclusive.
<b>6.7 Transgender</b>
The policy is all inclusive.

<p><b>7. Decisions</b></p> <p>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.</p> <p>If no changes are proposed, the policy needs to be objectively justified.</p>
<p>The policy is all inclusive and services are available to all affected by domestic abuse.</p>
<p><b>8. Monitoring arrangements</b></p> <p>If the policy is new what consideration has been given to piloting the policy?</p> <p>If monitoring is not already in place what arrangements have been made to monitor the effects of the policy on equality and diversity?</p>
<p>Monitoring in place, mirroring arrangements for the previous 4 years, with quarterly and annual reviews with service providers.</p>

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

EIA Form Dated  
01/08/2018



STAFFORDSHIRE  
**POLICE**

# Data Protection Impact Assessment

## Summary Assessment

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" Staffordshire Victim Support – Victims Services"

*A Data Protection Impact Assessment (DPIA) is a mandatory requirement under the Data Protection Act (2018). Publication improves transparency and can increase the public's understanding of how their information is used.*

The Stage 1 and Stage 2 DPIA considerations have been discussed between the DPO team and the IAO , Contract lead and SCO DPO.

Version	Version date	Requester of change	Summary of change(s)
1.0	01.11.23	SCO	Initial DPIA P

**OFFICIAL-SENSITIVE**  
(Update when complete)

**DOCUMENT REFERENCES**

Ref	Document Name	Version Number

**DDPO Assessment**

**\*\*\*DDPO Use Only\*\*\***

A. DPIA part 2 is not mandatory.	X	Covered in summary DPIA
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**Publication Scheme**

Can this DPIA be uploaded to the Publication Scheme, if not give reasons why i.e. sensitive material included that could disrupt policing operations	<input type="checkbox"/>	
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**Data Protection Impact Assessment (DPIA)**

Please provide as much detail as possible, avoiding technical language and acronyms, explaining the proposal in a way that someone with no prior knowledge could easily understand.

**Section 1 – Discussion**

Discussion Stakeholders	Donna Harvey DPO
	Daniel Cooke DDPO
	David Morris SCO DPO
	Helen Davies SCO
Date	During ISA review

**Section 2 - Purpose, Scope and Context**

In this section you must explain what the processing is, who it will involve, and the intended impact. You must also demonstrate why the processing is necessary and proportionate, providing evidence to support your assessment.

- The processing must be **necessary** for the specific objective of the proposal.
- It must also be **proportionate**, meaning that the advantages resulting from the processing should not be outweighed by the disadvantages to individuals.

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### Specific aim and purpose

The PFCC has led a collaboration with the LA to secure support for victims of crime under a commissioned contract.

The service will provide support services to those who report crime to Staffordshire Police from Victim Support as the commissioned provider.

The police will share referrals the categories and processes for data that will be shared is identified in the ISA.

What categories of personal data will be processed?

- Crime incident reference number and date reported
- Neighbourhood policing area Crime type (offence group and Home Office code)
- Outline details of the offence (Modus Operandi) including Aggravating factors
- Victim contact details including full name, address and post code, telephone number/s and email address (where available)
- (where victim is a Staffordshire Police Employee whilst on duty their force email address will be shared as their designated point of contact)
- Victim date of birth, gender and self-defined ethnicity

Information Exchange will be provided from Staffordshire Police as a business extract report from force Record Management System once crime has been validated.

Data Range and prevalence of data identified;

- Children or vulnerable individuals

The risk assessment has been reviewed and the DPA principles discussed – Risk is negligible / low and mitigation in relation to the management of data is included in the ISA/ DPA.

Specifically the following areas have been discussed and are detailed in the ISA/ DPA.

Collection, Storage, Access, Processing, RRD and Sharing.

The initial screening shows no areas of high risk.

### 2.3 Will special category data be used in the proposal? (Select all that apply)

- |   |   |
|---|---|
| <input type="checkbox"/> Race                     | <input type="checkbox"/> Trade union membership |
| <input checked="" type="checkbox"/> Ethnic origin | <input type="checkbox"/> Genetic Data           |
| <input type="checkbox"/> Political opinions       | <input type="checkbox"/> Biometric Data         |
| <input type="checkbox"/> Sex life                 | <input type="checkbox"/> Sexual orientation     |
| <input type="checkbox"/> Religion                 | <input type="checkbox"/> Health                 |
| <input type="checkbox"/> Philosophical beliefs    | <input type="checkbox"/> None                   |

Shared to ensure access to related specialist victims support pathways in relation to protected characteristics.

OFFICIAL-SENSITIVE

(Update when complete)

**OFFICIAL-SENSITIVE**  
(Update when complete)

<b>2.9 Data Sharing</b>	
<b>Does the processing involve:</b>	
2.10.1	Data being shared with third parties external to Staffordshire Police or recipients that have not previously had routine access to the information? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.10.2	Transferring data outside the UK but within the EU? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.3	Transferring data outside the EU? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.4	Storing data using a cloud service provider? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.5	Is there an ISA, contract, or other sharing agreement in place with all parties with whom data will be shared? <input checked="" type="checkbox"/> Yes – agreements in place <input type="checkbox"/> Not yet – agreements required <input type="checkbox"/> No – none required

**Section 3 – Lawful Basis**

**3.1 Lawful Basis**

To process personal data you must have a lawful basis. Please select the one appropriate lawful basis from the drop down list.

Lawful Basis for **Operational Data** (Personal data processed for law enforcement purposes):  
Necessary for a law enforcement purpose

Lawful Basis for **Administrative Data** (Personal data processed for non-law enforcement purposes, e.g. for HR or Commercial purposes):  
Necessary for the performance of a task carried out in the public interest or in the exercise of official authority

**Operational Data:**

The processing is strictly necessary (please tick to confirm) ☒

**AND**

One of the following conditions applies (select from the list):

Statutory Purpose

**Administrative Data:**

It is necessary for one of the following conditions (select from the list):

Choose an item.

**OR**

It is in the substantial public interest (tick to confirm) ☒

**AND** for the following purpose:

Statutory function

**Section 4 – Review, Retention and Disposal**

**OFFICIAL-SENSITIVE**  
(Update when complete)

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(Update when complete)

**4.1 Does the proposal have a review, retention and disposal process that complies with Staffordshire Police Policy?** All records must have an initial retention period set by the owner of the information when first created or received; review and disposal criteria are defined within the Staffordshire Police Retention and Disposal Schedule on the policy database.

☒ Yes☐ No**Section 5 – ICO: Additional Factors**

The Information Commissioner's Office have published a number of factors that present a 'high risk' when processing personal data. Saying yes to one or more of the following may indicate that the processing is high risk and a Stage 2 DPIA is likely to be required.

Does the processing involve:		Please check either Yes or No	If 'Yes' then please provide further details
5.1	<p><b>Systematic, extensive and large scale profiling and automated decision-making about people?</b>  <i>"Any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects, or significantly affect the natural person"</i></p> <p>Profiling is any form of processing where personal data is used to evaluate certain personal aspects relating to an individual, including the analysis or prediction of an individual's performance.</p> <p>Automated decision-making involves making a decision that affects someone by technological means without human involvement, for example issuing speeding fines solely based on evidence captured from speed cameras.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.2	<p><b>Large scale use of special category data or criminal offence data?</b>  <i>"Processing on a large scale of special categories of data, or personal data"</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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	<i>relating to criminal convictions and offences referred to in Article 10"</i>		
5.3	<b>Public monitoring?</b> <i>"Systematic monitoring of a publicly accessible area on a large scale"</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.4	<b>New technologies or techniques?</b> <i>"Processing involving the use of new technologies, or the novel application of existing technologies (including Artificial Intelligence)"</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.5	<b>Profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?</b> <i>"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"</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.6	<b>Biometrics/genetic data?</b> <i>"Any processing of biometric data" and/or "any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject" Biometric data can include Facial Recognition technology, fingerprints and is defined as</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.7	<b>Data matching?</b> <i>"Combining, comparing or matching personal data obtained from multiple sources"</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.8	<b>Invisible processing?</b> <i>"Processing of personal data that has not been obtained direct from the data subject in circumstances where providing a Privacy Notice would prove impossible or involve disproportionate effort"</i>  For example, when gathering data, without the knowledge of the data subject, in the course of a Police investigation.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.9	<b>Tracking?</b>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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	<p><i>"Processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment"</i></p>		
5.10	<p><b>Targeting of children or other vulnerable individuals?</b>  <i>"The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children"</i></p> <p>For example, the use of personal data relating to children for the purposes of marketing their online safety products.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.11	<p><b>Risk of physical harm?</b>  <i>"Processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals"</i></p> <p>For example, if data relating to CSAE, HUMINT or protected persons data was compromised then it could jeopardise the safety of individuals.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Victims Data for will be included in the sharing agreement. Data Sharing and Storage is identified in the ISA/DPA and sharing will be via secure email to central point in force and with VS to minimise data loss. Data minimisation processes define the data set requirements for meeting the contractual service needs. Safe contact options are provided in cases identified at risk based by original attending officer</p>
5.12	<p><b>Evaluation or scoring?</b>  <i>"Aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements" For example, as part of a recruitment process.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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(Update when complete)

5.13	<b>Data processed on a large scale.</b> <i>Considerations include:</i> <ul style="list-style-type: none"><li>• <i>The number of data subjects concerned</i></li><li>• <i>Volume of data and/or range of data items</i></li><li>• <i>Duration, or permanence, of the data processing</i></li><li>• <i>Geographical extent of data processing</i></li></ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.14	<b>Preventing data subjects from exercising a right?</b> <i>The rights are:</i> <ul style="list-style-type: none"><li>• <i>The right to be informed</i></li><li>• <i>The right to access data</i></li><li>• <i>The right to rectification</i></li><li>• <i>The right to erasure</i></li><li>• <i>The right to restrict processing</i></li><li>• <i>The right to object</i></li><li>• <i>The right to portability</i></li><li>• <i>Rights relating to automated processing</i></li></ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**DPO Summary : CH Insp Donna Harvey – DPO / HOIG 05.09.2023**

DPIA completed following discussions. Completed to define the requirements and responsibilities for the police only data sharing within the PFCC SCO awarded victim services with Victim Support.

It is agreed that there are DPIA considerations as the access and use of police data is person specific.

The any wider requirements of data management outside of police data with the awarded contractor is not specifically included in the DPIA consideration and outside of scope of the police DPA and ISA. This aspect is owned by the SCO DPO.

Victim Support are known 3<sup>rd</sup> party provider who are familiar with the Infosec and data management requirements of the police. There is a requirement for VS staff to undertake IG training and sign individual confidentiality agreements as part of the DPA.

DPIA review completed by DPO.



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# Data Protection Impact Assessment

## Summary Assessment

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" Staffordshire Victim Support Preparator Support Scheme"

*A Data Protection Impact Assessment (DPIA) is a mandatory requirement under the Data Protection Act (2018). Publication improves transparency and can increase the public's understanding of how their information is used.*

The Stage 1 and Stage 2 DPIA considerations have been discussed between the DPO team and the IAO , Contract lead and SCO DPO.

Version	Version date	Requester of change	Summary of change(s)
1.0	04.09.23	SCO	Initial DPIA P

**OFFICIAL-SENSITIVE**

(Update when complete)

**DOCUMENT REFERENCES**

Ref	Document Name	Version Number

**DDPO Assessment****\*\*\*DDPO Use Only\*\*\***

A. DPIA part 2 is not mandatory.	X	Covered in summary DPIA
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**Publication Scheme**

Can this DPIA be uploaded to the Publication Scheme, if not give reasons why i.e. sensitive material included that could disrupt policing operations	<input type="checkbox"/>	
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**Data Protection Impact Assessment (DPIA)**

Please provide as much detail as possible, avoiding technical language and acronyms, explaining the proposal in a way that someone with no prior knowledge could easily understand.

**Section 1 – Discussion**

Discussion Stakeholders	Donna Harvey DPO
	Daniel Cooke DDPO
	David Morris SCO DPO
	Helen Davies SCO
Date	01.09.2023

**Section 2 - Purpose, Scope and Context**

In this section you must explain what the processing is, who it will involve, and the intended impact. You must also demonstrate why the processing is necessary and proportionate, providing evidence to support your assessment.

- The processing must be **necessary** for the specific objective of the proposal.
- It must also be **proportionate**, meaning that the advantages resulting from the processing should not be outweighed by the disadvantages to individuals.

**OFFICIAL-SENSITIVE**

(Update when complete)

### **Specific aim and purpose**

The PFCC has led a collaboration with the LA to secure support for perpetrators under a commissioned contract.

The perpetrator service will provide consistent, baseline services across the whole area which are flexed according to local and individual needs (taking account of the diversity of geography and demography of the area and a comprehensive assessment of individual/family needs). It offers proportionate delivery of Tiers 1, 2, 3 and 4 of service provision, recognising the importance of early perpetrator intervention. The scheme is not specific to police and is a multiagency service provision from Victim Support as the commissioned provider.

The police will share referrals both relating to O OCD but also from any person in force where the criteria for support is met. The force will also support the safety of partners by providing proportionate information on the perpetrator to support insight for local staff safety risk assessments done by Victim Support when working directly and face to face with preparators. The categories and processes for data that will be shared is identified in the ISA.

What categories of personal data will be processed?

- Details to be provided from Staffordshire Police as a referral to designated point at Victim Support using agreed referral template. Details of perpetrator and offence limited to referral template
- Crime incident reference number
- Date and Neighbourhood Location of Offence
- Crime type and outline details of the offence (Modus Operandi)
- Perpetrator contact details including full name, address and post code, telephone number/s and email address (where available)
- Perpetrator date of birth
- Compliance Date and Date of Referral

Sharing will ensure the safety of a partner during a domestic abuse perpetrator programme or management of an offender on a related order or any other circumstance justifiable on public protection grounds, e.g., domestic abuse enquiries.

Risk Assessment Request to CDU

- Crime incident reference number
- Outline details of the offence (Modus Operandi)
- Perpetrator contact details including full name, address and post code. Email and Phone Contact
- Perpetrator date of birth
- Legal Basis for request

CDU response

- PNC Disposal Summary
- PNC Warning Markers
- Niche Warning flags / markers related to risk
- Storm Markers relating to risk

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Data Range and prevalence of data identified;  
0 to 100 data subjects

- Persons suspected of having committed or being about to commit a criminal offence
- Persons convicted of a criminal offence
- Other persons with information about offences
- Children or vulnerable individuals

The risk assessment has been reviewed and the DPA principles discussed – Risk is negligible / low and mitigation in relation to the management of data is included in the ISA/ DPA.

Specifically the following areas have been discussed and are detailed in the ISA/ DPA.

Collection, Storage, Access, Processing, RRD and Sharing.

**2.3 Will special category data be used in the proposal? (Select all that apply)**

- |  |   |
|--|---|
| <input type="checkbox"/> Race                  | <input type="checkbox"/> Trade union membership |
| <input type="checkbox"/> Ethnic origin         | <input type="checkbox"/> Genetic Data           |
| <input type="checkbox"/> Political opinions    | <input type="checkbox"/> Biometric Data         |
| <input type="checkbox"/> Sex life              | <input type="checkbox"/> Sexual orientation     |
| <input type="checkbox"/> Religion              | <input type="checkbox"/> Health                 |
| <input type="checkbox"/> Philosophical beliefs | <input checked="" type="checkbox"/> None        |

**2.9 Data Sharing**

**Does the processing involve:**

**Select one option**

2.10.1	Data being shared with third parties external to Staffordshire Police or recipients that have not previously had routine access to the information?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2.10.2	Transferring data outside the UK but within the EU?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.3	Transferring data outside the EU?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.4	Storing data using a cloud service provider?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10.5	Is there an ISA, contract, or other sharing agreement in place with all parties with whom data will be shared?	<input checked="" type="checkbox"/> Yes – agreements in place <input type="checkbox"/> Not yet – agreements required <input type="checkbox"/> No – none required

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(Update when complete)

**Section 5 – ICO: Additional Factors**

The Information Commissioner's Office have published a number of factors that present a 'high risk' when processing personal data. Saying yes to one or more of the following may indicate that the processing is high risk and a Stage 2 DPIA is likely to be required.

Does the processing involve:	Please check either Yes or No	If 'Yes' then please provide further details
<p><b>5.1</b></p> <p><b>Systematic, extensive and large scale profiling and automated decision-making about people?</b>  <i>"Any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects, or significantly affect the natural person"</i></p> <p>Profiling is any form of processing where personal data is used to evaluate certain personal aspects relating to an individual, including the analysis or prediction of an individual's performance.</p> <p>Automated decision-making involves making a decision that affects someone by technological means without human involvement, for example issuing speeding fines solely based on evidence captured from speed cameras.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p><b>5.2</b></p> <p><b>Large scale use of special category data or criminal offence data?</b>  <i>"Processing on a large scale of special categories of data, or personal data relating to criminal convictions and offences referred to in Article 10"</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p><b>5.3</b></p> <p><b>Public monitoring?</b>  <i>"Systematic monitoring of a publicly accessible area on a large scale"</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p><b>5.4</b></p> <p><b>New technologies or techniques?</b></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

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	<p><i>"Processing involving the use of new technologies, or the novel application of existing technologies (including Artificial Intelligence)"</i></p>		
5.5	<p><b>Profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?</b>  <i>"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"</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.6	<p><b>Biometrics/genetic data?</b>  <i>"Any processing of biometric data" and/or "any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject" Biometric data can include Facial Recognition technology, fingerprints and is defined as</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.7	<p><b>Data matching?</b>  <i>"Combining, comparing or matching personal data obtained from multiple sources"</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Risk assessment process in CDU will search Niche , PNC and Storm
5.8	<p><b>Invisible processing?</b>  <i>"Processing of personal data that has not been obtained direct from the data subject in circumstances where providing a Privacy Notice would prove impossible or involve disproportionate effort"</i></p> <p>For example, when gathering data, without the knowledge of the data subject, in the course of a Police investigation.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.9	<p><b>Tracking?</b>  <i>"Processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment"</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.10	<p><b>Targeting of children or other vulnerable individuals?</b>  <i>"The use of the personal data of children or other vulnerable individuals</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**OFFICIAL-SENSITIVE**

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	<p><i>for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children</i></p> <p>For example, the use of personal data relating to children for the purposes of marketing their online safety products.</p>		
5.11	<p><b>Risk of physical harm?</b>  <i>"Processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals".</i></p> <p>For example, if data relating to CSAE, HUMINT or protected persons data was compromised then it could jeopardise the safety of individuals.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>Perpetrator Data for DA abuse will be included in the sharing agreement. Data Sharing and Storage is identified in the ISA/DPA and sharing will be via secure email to central point in force and with VS to minimise data loss.</p>
5.12	<p><b>Evaluation or scoring?</b>  <i>"Aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements" For example, as part of a recruitment process.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.13	<p><b>Data processed on a large scale.</b>  <i>Considerations include:</i></p> <ul style="list-style-type: none"> <li><i>• The number of data subjects concerned</i></li> <li><i>• Volume of data and/or range of data items</i></li> <li><i>• Duration, or permanence, of the data processing</i></li> <li><i>• Geographical extent of data processing</i></li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
5.14	<p><b>Preventing data subjects from exercising a right?</b>  <i>The rights are:</i></p> <ul style="list-style-type: none"> <li><i>• The right to be informed</i></li> <li><i>• The right to access data</i></li> <li><i>• The right to rectification</i></li> <li><i>• The right to erasure</i></li> <li><i>• The right to restrict processing</i></li> <li><i>• The right to object</i></li> <li><i>• The right to portability</i></li> <li><i>• Rights relating to automated processing</i></li> </ul>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

**OFFICIAL-SENSITIVE**

(Update when complete)

**DPO Summary : CH Insp Donna Harvey – DPO / HOIG 05.09.2023**

DPIA completed following discussions. Completed to define the requirements and responsibilities for the police only data sharing within the PFCC SCO awarded perpetrator support services with Victim Support.

It is agreed that there are DPIA considerations as the access and use of police data is person specific.

The wider requirements of data management outside of police data with the awarded contractor is not specifically included in the DPIA consideration and outside of scope of the police DPA and ISA. This aspect is owned by the SCO DPO.

The force has a previous DPIA for the victim services aspect of the contract with Victim Support. They are a know 3<sup>rd</sup> party provider who are familiar with the Infosec and data management requirements of the police. There is a requirement for VS staff to undertake IG training and sign individual confidentiality agreements as part of the DPA.

DPIA record completed by DPO.