

#### OFFICIAL

## Decision Note – Crest Support to LCJB Performance Framework Product: Year 2



## **REQUEST FOR DECISION BY THE STAFFORDSHIRE COMMISSIONER**

|                           | Policing: | Crime: | Fire &<br>Rescue: |
|---------------------------|-----------|--------|-------------------|
| This decision relates to: | Yes       | Yes    | No                |

|   |       | Rationale for approval                                       |
|---|-------|--|
| Signature Date 20/04/2021   |       |  |
| Signature Date 20/04/2021<br>e decision required by:  |       |  |
| Signature       Date       20/04/2021         ate decision required by:       an urgent approval is required, please state reasons: |       | STAFFORDSHIRE COMMISSIONER                                   |
|   |       | Signature Date 20/04/2021                                    |
|   | te de | ecision required by:   |
|   |       |  |
|   |       |  |
|   |       | For completion by Staffordshire Commissioner's Office only:- |

Date Received: 20 April 2021

|   | 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?   |     |    |
| The Staffordshire Commissioner  |     |    |

#### Title Crest Support to LCJPB Performance Framework Product

#### Summary

This decision form requests the Staffordshire Commissioner to approve the purchase of CREST Analytical consultancy to support delivery of quarterly performance reports for the Local CJS Partnership Board. Crest has delivered three of four quarterly performance reports for the Staffordshire PCC/LCJB during 2020/2021 which have been shared and supported by the LCJPB and the final report is due in April 2021. Funding is required for the next 12 months to maintain provision of the 4 quarterly reports; develop the framework to include the Domestic Abuse measures and further develop Fairness measures. £22,400K plus VAT (28days consultancy)

The framework report product has been approved by LCJPB and supported by all partners.

The national programme for a national CJS Performance Framework product has not yet been developed sufficiently to provide LCJB's with an overview of local CJS issues and the engagement of CREST is intended to be extended locally for the a further 12 months (to be extended if required).

Crest have indicated that they can continue to support delivery of a further four reports as per delivery in 2020/2021.

There may be additional development costs if we identify additional metrics and local data to be included in the framework. These are chargeable at consultancy days cost £800 per day.

#### Recommendations

1. That the Staffordshire Commissioner approves the consultancy for 28 days for further development work on our CJS Performance Framework, consultancy and 4 reports July 21, Sept 21, Jan 22, April 22 at a cost of £22,400K +VAT.

#### **Chief Executive**

I hereby approve the recommendation for consideration.

hie

Signature:

Date: 15/04/21

## **REPORT AND ADVICE TO THE STAFFORDSHIRE COMMISSIONER**

#### Context

Crest has delivered three of four quarterly performance reports for the Staffordshire PCC/LCJB. The fourth report will be delivered in April 2021. These reports have been developed over time in partnership with the OPCC, and the fourth report is expected to be the final iteration in terms of the inclusion of any new performance indicators.

The reports are split into three sections covering:

- Effectiveness and Efficiency of the Criminal Justice System
- Victims and Witnesses
- Reoffending

These individual sections of the report have been designed so that they can act as stand-alone reports to support specific objectives.

The reports have been met with approval from the LCJB and relevant sub groups in Staffordshire, but other PCCs have started to enquire about the framework used and the analysis provided. Crest has recently provided the APACE with a proposal to deliver the reports currently provided for Staffordshire, for each PCC nationally.

Staffordshire OPCC is now looking to ensure that performance reporting continues once the final report is delivered by Crest in April, up until the point at which a national commission for the work may occur.

Note: The current budget does not include Crest attendance at any regional board meetings (bar virtually at the regional analysts meeting). Should this be required Crest would provide updated costings.

#### Proposal for rolling quarterly update reports

Crest proposes to deliver four quarterly reports on a rolling basis for one year from April 2021. Each report produced going forward will include, where possible, all of the metrics used in Report 4 of the current contract. Staffordshire OPCC will provide dates for each LCJB and Sub-Group meeting to Crest at least 6 weeks in advance to provide enough notice to produce the report on time.

If Staffordshire wishes to cancel the contract in order to join a national/group commission for the work, notice of six weeks will be required, but the contract will be cancelled without any financial repercussions.

If Staffordshire wishes to cancel the contract without joining a national commission the full amount for the four quarterly reports will still be payable.

In addition to the production of the quarterly reports, Crest will join each quarterly meeting of the Regional CJ Analyst group to discuss findings from the report.

#### Total consultancy days: 20

#### Proposal for Domestic Abuse performance framework development

Crest also proposes to create a new subsection of the existing framework focussing on domestic abuse. This will enable partners to come together to understand domestic abuse demand and performance in one place.

The work will aim to include analysis of the following indicators where provided:

- Number of MARACs
- Number of cases managed by MARAC
- Number of people accessing DA services

- Number of DA incidents and crimes reported
- Number of DA joint commissioning meetings
- Number of training sessions held for professionals
- Number of DVDS applications
- Number of DVPN applications
- Number of service referrals to other services
- Number of DA champions
- Number/proportion of perpetrators receiving out of court disposals
- Number/proportion of programmes successfully completed
- Number of Osman's (TtL) warnings given
- Number of MARAC cases where risk is reduced

If further (up to 10 additional) indicators are developed over the course of the project these can also be included.

Total consultancy days to develop the Domestic Abuse section of the framework: 5 Total consultancy days include Domestic Abuse analysis in each of the 4 quarterly performance reports: 2

#### Costs

The total cost of this programme of work over one year will be £22,400 + VAT. This is based on 28 consultancy days (including 1 day for account management) at a rate of £800/day.

#### Limitations

Inclusion of the local metrics in the quarterly reports is conditional on analytical capability within each of the CJS agencies involved to provide a preliminary data analysis. If raw data sets are to be provided for each of the indicators we will not have sufficient time in the budget to analyse all indicators, compile them into a report and consider the implications, and the budget will need to be reconsidered.

#### Costs

The total cost of this programme of work over one year will be £22,400 + VAT. This is based on 28 consultancy days (including 1 day for account management) at a rate of £800/day.

The total cost per report once the domestic abuse section has been added will be £4,600 + VAT.

The involvement of other PCCs would reduce costs to Staffordshire. Discussions have taken place via APACE and will continue to do so.

#### 1. Issues for consideration

- There is a separate national project for a CJS performance framework being developed but a product will not be seen this year, 2021.
- This product will be an interim solution until more PCC's take up the wider CREST product directly from CREST.
- Staffs PFCC can transfer from this product and move to the wider CREST product with reduced costs as soon as enough PCC's take up the product and benefit from economies of scale.
- There are some development costs included in this product to include some DA specific measures within the V&W theme.
- There may be additional development costs if we identify additional metrics and local data to be included in the framework. These are chargeable at consultancy days cost £800 per day.

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

The CJS Analyst group has considered employing an analyst to collate this data for the region and sharing the cost but as CREST now intend to share the product more widely than the West Midlands region it seems prudent to benefit from wider learning and development that CREST can share through a national product. In addition, a national product will be available in the long term and the analyst role for the region could then be redundant. The CREST product will be available immediately with no change to delivery mechanism for 2021/2022.

#### 3. Consultation and Engagement undertaken

- LCJPB
- Crest Advisory
- Regional CJS Performance Analyst Group
- Regional CJS Forum
- Regional PCC Offices
- APACE

## **Report Implications**

#### 4. Monitoring Officer comments

If agreed, this contract will be procured via the Crown Commercial Framework. This would be the second procurement of Crest resources by the SCO.

Chie

Date 15/04/21

#### 5. Section 151 Officer comments:

Cum

This is unbudgeted spend for the SCO and if agreed will need to be funded from brought forward reserves held by the Staffordshire Commissioner.

Signature

Signature:

Date 16/04/2021

 Yes
 No

 Has legal advice (outside of that provided by the Monitoring Officer) been sought
 X

on the content of this report? 6. Legal Comments:

N/A

#### 7. Equality Comments

There are no direct equality implications arising from the proposal. However, a well-developed CJS performance framework will assist in addressing one of the key priorities in our local strategy, which is that of fairness.

| 8. | Background/supporting | paper |
|----|-----------------------|-------|
|----|-----------------------|-------|

## None

## 9. Public access to information

To be published

## 10. Is the publication of this form to be deferred?

No

| 11. If the report is for publication, is redaction required? No |     |     |
|---|-----|-----|
|   | Yes | No  |
| Of the Decision Note?   |     | Х   |
| Of the Appendix?  |     | N/A |

#### **ORIGINATING OFFICER DECLARATION:**

| Author | Helen Booth |
|--------|-------------|
| Signed | Abooh       |
| Date   | 22/03/2021  |

## **Equality Impact Assessment**



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.

| Title of policy/procedure: | Procurement of CREST consultancy services to support<br>wider CJS Performance Framework for the Staffordshire<br>LCJPB and sub groups |
|----------------------------|---|
| Department:                | Strategy & Change   |
| Date:                      | 31/3/2021   |

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

Staffordshire CJS Performance Framework:

CREST consultancy services to support wider CJS Performance Framework for the LCJPB and sub groups; Victims & Witnesses Commissioning and Development Board (V&WCDB); Staffordshire & Stoke-on-Trent Reducing Reoffending Board (SSRRB).

The output of the consultancy is 4 quarterly reports to share cross agency performance information and oversight of local CJS to provide assurance of quality of service and identify areas for improvement.

LCJPB members will have access to the final reports as will the members of the SSRRB and V&WCDB and CJS Analysts network.

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

#### affected by the policy.

Individuals: LCJPB members; SSRRB members; V&WCDB members; Victims & Witnesses of Crime; Offenders identified within the CJS;

Organisations: HMCTS; CPS; NPS; Staffordshire Police; Staffordshire Commissioners office; Victim Contact Scheme; Staffs YOS; Stoke-on-Trent YOS;

| 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   |
| National and Local Workforce representation information for each organisation (Staff in post and recruitment); Victims & Witnesses and Offender demographics.   |
| 3.2 Disability  |
| As above  |
| 3.3 Race  |
| As above  |
| 3.4 Religion or Belief  |
| As above  |
| 3.5 Sex   |
| As above  |
| 3.6 Sexual Orientation  |
| As above  |
| 3.7 Transgender   |
| As above  |

#### 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

This CREST product can be used to provide significant research into the fairness of the CJS process across all protected groups and will improve knowledge and understanding for the future.

#### 4.2 Disability

As above

#### 4.3 Race

As above

#### 4.4 Religion or Belief

As above

#### 4.5 Sex

As above

#### 4.6 Sexual Orientation

As above

#### 4.7 Transgender

As above

#### 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

No consultation specific to protected groups as this is to support data collection and research in support of actions from Lammy, Scarman, Macpherson and Denman reports.

#### 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 |  |
| 3.0 Sexual Orientation |  |
| As above               |  |
| ·                      |  |
| 5.7 Transgender        |  |
|                        |  |

#### 6. Conclusions

As above

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 CREST report will identify areas of disproportionality which will be followed up by actions into the LCJPB and associated subgroups for improving fairness across the CJS.

#### 6.2 Disability

As above

#### 6.3 Race

As above

#### 6.4 Religion or Belief

As above

## 6.5 Sex

As above

#### 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.

The CREST Performance Framework may identify disproportionality in one of more areas of the CJS. Through this knowledge and understanding policies or processes in one of more of the CJS agencies may require action.

#### 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?

The CJS Performance Framework has been developed and piloted for the last 12 months via the LCJB. (June 2020 to present)

All CREST reports and associated actions will be actioned and monitored via LCJB or sub groups; SSRB or V&WCDB.

This is a further 12 month extension of consultancy and provision of 4 further reports. This will be reviewed in March 2022. This equality impact assessment will be published on the SC website.

EIA Form Dated 01/08/2018



# Data Protection Impact Assessment for

# CREST Consultancy Services: CJS Performance Framework

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**

| System Owner | <b>Business Lead</b> | Information<br>Asset Owner | Project<br>Manager |
|--------------|----------------------|----------------------------|--------------------|
| Glynn Dixon  |                      |                            | Helen Booth        |
|              |                      |                            |                    |

| Author      | Role                | Department              |
|-------------|---------------------|-------------------------|
| Helen Booth | Performance Manager | SCO – Strategy & Change |

| Version | Version<br>date | Requester of change | Summary of change(s) |
|---------|-----------------|---------------------|----------------------|
| 1       | 31/03/2021      | Helen Booth         | New document         |
|         |                 |                     |                      |
|         |                 |                     |                      |

#### **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.

| Dooc the intended | nrocessing of | personal information | n involva anv | i of the following? |
|-------------------|---------------|----------------------|---------------|---------------------|
|                   | processing or |                      |               | y of the following: |

|     | Intended processing   | Yes | No |
|-----|---|-----|----|
| 1.  | Systematic and extensive profiling with significant effects?  |     | No |
| 2.  | Large scale use of sensitive data?  |     | No |
| 3.  | Public monitoring?  |     | No |
| 4.  | New technologies (processing involving the use of new technologies, or the novel application of existing technologies (including AI)?   |     | No |
| 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?  |     | No |
| 6.  | Large-scale profiling: any profiling of individuals on a large scale?   |     | No |
| 7.  | Biometrics: any processing of biometric data?   |     | No |
| 8.  | Genetic data: any processing of genetic data?   |     | No |
| 9   | Data matching: combining, comparing or matching personal data obtained from multiple sources.   |     | No |
| 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.                   |     | No |
| 11. | Tracking: processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment.   |     | No |
| 12. | Targeting of children or other vulnerable individuals: the use of the personal data of children<br>or other vulnerable individuals for marketing purposes, profiling or other automated decision-<br>making, or if there is an intention to offer online services directly to children. |     | No |
| 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.  |     | No |
| 14. | Any other processing which is large scale involves profiling or monitoring, decides on access<br>to services or opportunities or involves sensitive data or vulnerable individuals.   |     | No |

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</b><br><b>impact on individuals.</b> Include associated compliance<br>and corporate risks as necessary. | Likelihood<br>of harm              | Severity<br>of harm                  | Overall<br>risk score |
|--|------------------------------------|--------------------------------------|-----------------------|
|  | Remote,<br>possible or<br>probable | Minimal,<br>significant<br>or severe |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |
|  |                                    |                                      |                       |



OFFICIAL

## **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<br>eliminate risk | Effect on<br>risk | Residual<br>risk score | Measure approved |
|------|--|-------------------|------------------------|------------------|
|      |  | Eliminated,       |                        | Yes/no           |
|      |  | reduced or        |                        |                  |
|      |  | accepted          |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |
|      |  |                   |                        |                  |

# Step 7: Sign off and record outcomes

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

The SCO is acting as data controller for several management information datasets from a variety of CJS partners as part of the CJS Performance Framework. Contributing agencies include HMCTS, CPS, Staffs Police, CRC, NPS, HMPPS, Public Health England, Stoke-on-Trent and Staffordshire YOS, Local MARACS / MASH. There is no individual identifiable personal data involved but personal protected characteristics may form part of the data collection. Gender/Race/Disability etc

Anonymised data is collated and shared with the project team and CJ Analysts Network and quarterly reports summarising trends are shared with the Local Criminal Justice Board (LCJB), Staffordshire & Stoke-on-Trent Reducing Reoffending Board (SSRRB) and Victims & Witnesses Commissioning and Development Board (V&WCDB). To provide an overview of performance of the local CJS and identify areas of concern and actions for improvement. To specifically understand the impact of fairness and representation within the CJS. To identify actions for improvement of disproportionality among partner agencies in the CJS.

All data is shared between CJS organisations via secure email; HMCYS; CPS; NPS; Staffs Police; Victim Contact Scheme; YOS; (CRC until June 2021). Data visualisation is carried out by CREST consultancy and 4 quarterly reports are produced. The CJS Analyst Network provides context for reports; adds commentary on trends and advices on specific actions.

Screening at section 1 demonstrates that there is no need for a DPIA as there is no identifiable personal data being collected.

| Sign-Off Authority | Role                                    | Date     | Signature |
|--------------------|---|----------|-----------|
| Helen Booth        | Project Manager                         | 31/03/21 | Abooh     |
| Helen Booth        | Information Asset Owner                 | 31/03/21 | Abooh     |
| David Morris       | Data Protection Officer                 | 15/04/21 | Main      |
| Glynn Dixon        | Senior Information Risk<br>Owner (SIRO) | 06/04/21 | hte       |

# Appendix A – Calculation of Risk

| 9.1 Data Protection Principles  |  |
|---|--|
| 1. Fair and Lawful  | 5. Retention   |
| - Do you need to create or amend a privacy notice?                                | - Do you have a review, retention and disposal policy?   |
| - If processing on the basis of consent, how will this be collected and recorded? | - Can data be deleted/erased from all Staffordshire Police systems if required?                                |
|   | - Is the retention period necessary and proportionate?   |
| 2. Purpose  | Limitation   |
| - Does the processing actually achieve your purpose?                              | 6. Security  |
| - Will the data be used for another purpose?                                      | - What technical and organisational measures are in place to protect data?                                     |
| - How will you prevent function creep?  | - How will you protect against unauthorised access, alteration or removal of data?                             |
|   | - What training and guidance will be given to staff?   |
| 3. Data Minimisation  | - How would you identify and manage a breach?  |
| - Will you only process the data needed for your purpose?                         | - How will systems be tested?  |
| - How will you ensure and maintain data quality?                                  |  |
|   | 7. Data Subject Rights   |
| 4. Accuracy   | - If an individual wishes to exercise their rights, including requesting access to data, or asking for data to |
| - How will you ensure data can be corrected or amended?                           | be corrected, amended, restricted or deleted then you must have procedures in place to recognise such a        |
| - Will you ensure data is accurate and up to date?                                | request and refer it to the DPO.   |
|   |  |
|   |  |

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

### 1.1.1 Calculation of Risk

The risk value shall be calculated by multiplying the impact and likelihood figures together. This score will then indicate the severity of the risk.

For example:

(Likelihood) 3 x (Impact) 5 = Risk value of 15

|            | 5      | 5<br>Low      | 10<br>Medium  | 15<br>High   | 20<br>Very<br>High | 25<br>Very High |
|------------|--------|---------------|---------------|--------------|--------------------|-----------------|
|            | 4      | 4<br>Low      | 8<br>Medium   | 12<br>Medium | 16<br>High         | 20<br>Very High |
| Likelihood | 3      | 3<br>Low      | 6<br>Medium   | 9<br>Medium  | 12<br>Medium       | 15<br>High      |
| Likel      | 2      | 2<br>Very Low | 4<br>Low      | 6<br>Medium  | 8<br>Medium        | 10<br>Medium    |
|            | 1      | 1<br>Very Low | 2<br>Very Low | 3<br>Low     | 4<br>Low           | 5<br>Low        |
|            |        | 1             | 2             | 3            | 4                  | 5               |
|            | Impact |               |               |              |                    |                 |

#### Likelihood score

| Score       | Probability       |                       | Description                            |  |
|-------------|-------------------|-----------------------|--|--|
|             | %                 | Timeframe             |  |  |
| 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

| •          |                             |                          | Public                    |
|------------|-----------------------------|--------------------------|---------------------------|
| Score      | Financial/other enablers    | Operational              | Confidence/Reputational   |
| 1.         | 0 to <0.1% of budget/cost   | 0 to 0.5% shift in key:  | 0 to 0.5% shift in:       |
| Negligible | savings and / or Negligible | 1. Early Intervention    | 1. Levels of Satisfaction |
|            | impact on modern policing   | measures                 | 2. Feelings of safety     |
|            | key activity delivery       | 2. Supporting victims    | 3. Fair and respectful    |
|            |                             | and witness measures     | treatment and/or          |
|            |                             | 3. Managing offenders    | Low level localised       |
|            |                             | measures                 | media interest            |
|            |                             | and/or                   | and/or                    |
|            |                             | Negligible impact on     | Minor impact on key       |
|            |                             | key operational activity | public confidence         |
|            |                             | delivery                 | activity delivery         |
|            |                             |                          |                           |

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

| 4. Major  | >2 to 4% of budget/cost<br>savings and/or<br>Major impact on modern<br>policing key activity delivery | <ul> <li>&gt;5 to 10% shift in key:</li> <li>1. Early Intervention<br/>measures</li> <li>2. Supporting victims<br/>and witness measures</li> <li>3. Managing offenders<br/>measures<br/>and/or<br/>Major impact on key<br/>operational activity<br/>delivery</li> </ul>  | <ul> <li>&gt;5 to 10% shift in:</li> <li>1. Levels of Satisfaction</li> <li>2. Feelings of safety</li> <li>3. Fair and respectful<br/>treatment and/or</li> <li>1. Long term regional<br/>media coverage or<br/>public/political concern</li> <li>2. Limited national<br/>media coverage or<br/>public/political concern<br/>and/or</li> <li>Major impact on key<br/>public confidence<br/>activity delivery</li> </ul> |
|-----------|---|--|---|
| 5. Severe | >4% of budget/cost savings<br>and/or<br>Severe impact on modern<br>policing key activity delivery     | <ul> <li>&gt;10% shift in key:</li> <li>1. Early Intervention<br/>measures</li> <li>2. Supporting victims<br/>and witness measures</li> <li>3. Managing offenders<br/>measures<br/>and/or</li> <li>Severe impact on key<br/>operational activity<br/>delivery</li> </ul> | <ul> <li>&gt;10% shift in:</li> <li>1. Levels of Satisfaction</li> <li>2. Feelings of safety</li> <li>3. Fair and respectful<br/>treatment and/or</li> <li>1. Loss of credibility in<br/>organisation</li> <li>2. International media<br/>coverage 3. Public<br/>enquiry<br/>and/or</li> <li>Severe impact on key<br/>public confidence<br/>activity delivery</li> </ul>  |