



Policy Impact Assessment
(including Equality Impact Assessment)

The purpose of conducting this Policy Impact Assessment is

- to ensure that the activities of the Force when delivering policy, strategy, function or working practice do not have an unjustified and adverse impact on policing minority groups and communities of Devon, Cornwall and Isles of Scilly.
- to ensure that the activities of the Force when delivering policy, strategy, function or working practice does not have an unjustified and adverse impact on its staff, particularly those from minority groups.
- to ensure any new or revised policy, together with its associated **working practices** complies with our obligations, some of which are statutory, in respect of:
 - Reducing Bureaucracy – Section A
 - Freedom of Information – Section B
 - Data Protection – Section C
 - Management of Police Information – Section E
 - Health & Safety/Environmental – Section D
 - Equality and Human Rights Impact (screening decision) – Section F
 - Equality Impact Assessment (full) - Section G

Please complete this form in conjunction with the Force Policy Handbook and assessment guidance notes available on the Force Policy Admin Website or by contacting the Force Policy Admin Team on 22826/22336/22557.

Policy (function/procedure/working practice/strategy) Title and Number	Protecting Sensitive Logs in STORM		
Name and contact details of Assessor	Policy Officer Ext 23642		
Policy Owner (Department)	Crime and Criminal Justice Department		
Portfolio Owner (COG)	ACC Delivery		
Date of Assessment	23/04/15		
Policy Version date (to be completed by Policy Admin)	11/06/2015		
Verified by : (Policy Officer)	Policy Officer		
Associated working practices :	None		
Date submitted to Policy Admin	03/06/2015	Check completed and registered	11/06/2015

- **For the purposes of ease of reference 'Policy' as referred to within this Assessment equates to : Policy/Function/Project/Procedure/Working Practice/Strategy/Step by Step Guidance.**

Reducing Bureaucracy – Section A (to be completed for new policies only)

Please complete in conjunction with the guidance notes

1.1 What has changed or emerged to trigger this new policy and are the objectives of the policy clear and linked with Force Strategy?

The force is in the process of changing its command and control system from OIS to STORM. As a result of this, a new process for the protecting sensitive logs in STORM is necessary.

1.2 Does the new policy impact unnecessarily on any front-line staff. If it does, how?

No

1.3 What is the full impact on implementing this new policy? (eg are new processes required/cost implications/bureaucratic burden/risks involved)

New processes are required as a direct result of this policy. However, this has been addressed in the EIA of introducing STORM itself.

Freedom of Information – Section B

Please complete in conjunction with the guidance notes

2.1 Has the Policy been FOI marked in accordance with the relevant exemptions? (Where a paragraph/section is 'Closed' one or more of the 23 exemptions must be identified and justified – for further details see guidance notes)

Policy is FOI open, and marked appropriately.

Data Protection – Section C

Please complete in conjunction with the guidance notes

3.1 Does the Policy refer to personal information? (i.e. any information which identifies a living individual)

No, not directly

If yes please complete the following : Yes If No – go to Section D

3.2 Please list the personal information that will be collated? (eg name, dob, address etc)

Personal information included in a STORM log such as name, address, date of birth

3.3 How will it be collated? (Where will we get the personal information? the individual?)

By investigating officers

3.4 Why is it to be collated and how will it be kept up to date?

Official - Open

The information is collated to allow a full and thorough investigation. It is only available to appropriate staff therefore mitigating any risk of exposure of information but allowing investigating officers to keep the information up to date.

3.5 Are the time periods for retention of the personal information defined? (See Policy D32)

Not in the policy. However, the view ratings will be reviewed to ensure they are continually correct.

3.6 Is the process for removal and disposal of the personal information defined?

Only for the view ratings.

3.7 Are access controls in place, for the defined personal information, in accordance with the Government Protective Marking Scheme? (ie Not Protectively Marked, Restricted or Confidential) - Please contact the Information Assurance Unit for further guidance. Their contact details can be found on the attached [link](#)

Yes. The policy covers enhanced access issues.

3.8 If personal information is to be routinely disclosed please identify the relevant lawful basis - (please contact the Data Protection Unit for guidance on this issue) Their contact details can be found on the attached [link](#)

Information can be disclosed in a Court of Law under the Criminal Procedure and investigation Act 1996.

Records Management and Management of Police Information – Section D

Please complete in conjunction with the guidance notes

4.1 Will the application of this policy generate information which will be held for policing purpose? ie

- Protecting life and property
 - Preserving order
 - Preventing the commission of offences
 - Bringing offenders to justice
 - Any duty or responsibility on the police arising from common or statute law
- OR

Does it generate formal records? - If it “comprises sufficient content, context and structure to provide evidence of the activity – that is, it contains information that is worthy of preservation in the short, medium or long term”.

This will mainly incorporate the information held to meet **legal** requirements **or** information that is required to be maintained for operational and/or business reasons, e.g. MoPI, PACE, HR Records etc. The managers of your specific business function will provide the guidance on what is encompassed in this scope.

If Yes - list the records generated by this Policy :

POLICY	RECORDS GENERATED	RETENTION PERIOD	AUTHORITY FOR
--------	-------------------	------------------	---------------

Official - Open

PARAGRAPH NUMBER			RETENTION
Sections 2 and 3.	STORM incident log.	As per management of risk; Minimum 6 years/'Life' of the crime.	MoPI regulations, Limitations Act, D32 – Retention of Information, CPIA (1996)
3.1.6	STORM audit trails of action taken re access controls	“	“
3.1.7	Decisions by investigating officers in relation to legislative disclosure rules	“	“
3.2.3, 3.2.9	FIM/SMT assessment/review of view ratings	“	“
3.2.9	Request to SMT for enhanced level of security	“	“
3.2.11	Information on the decision behind the creation of the view rating between FIM and FIB	“	“

4.2 Does this policy have any connection with :

- Collection
- Recording
- Evaluation and actioning
- Sharing
- Review retention and disposal of information

If No - then this policy does not fall under MoPI requirements - go to Section E

If Yes - does the Policy contain links to documented working practices/guidance covering roles and responsibilities?

Yes. Policy is linked to the following policies:-

D338 – Force Lawful Business Monitoring Policy
D32 – Records Management Policy

Health & Safety/Environmental/Green Agenda – Section E

Please complete in conjunction with the guidance notes

5.1 Does this policy have health and safety implications for the public or for our staff? If yes – are they detailed within a generic risk assessment? (please include GRA reference if a risk assessment has been completed. If not covered by a generic risk assessment – a specific risk assessment should detail any significant risks.)

In accordance with the use of visual display equipment GRA 522 would apply to this policy.

5.2 Who has been consulted in respect of health and safety issues? (eg Health & Safety Advisor/Occupational Health/Operations/Federation/Unions)

Not considered relevant.

Official - Open

5.3 Has compliance with environmental legislation and the 'green agenda' been considered with respect to this policy?

If so, please provide details

If not, explain why

The introduction of a new computer system to manage command and control will decrease the reliance on paper records.

Equality Impact Screening and Human Rights – Section F

- Initial Impact Screening - decision checklist -

Please complete in conjunction with the guidance notes

(6.1-6.10 - to be completed by Policy Officer/Assessor)

6.1 What is the purpose of the policy?	
This policy guidance has been created to establish guidelines concerning the protecting of sensitive logs in the force command and control ICT system, STORM.	
6.2 Does the policy contain any potential interference with an individual's rights as set out in the Convention Articles listed within the Human Rights Act? (the articles most likely to impact are listed within the guidance notes at Appendix 'A')	
No	
6.3 Does the policy contain a statement explaining what the specific legal basis is for any potential interference within the Human Rights Act? Explain in full (including whether the interference is justifiable, necessary and proportionate)	
N/A	
6.4 What are the positive/adverse impacts of the implementation of the policy? Explain in full	
The implementation of this policy will provide clear guidance concerning the protecting of logs within the command and control system, STORM.	
6.5 Proceeding to full Equality Impact Assessment?	
YES	NO
6.6 Date of screening decision	
12 th June 2012	
6.7 Deadline for completing assessment or proposed deferred date	
n/a	
6.8 If NOT proceeding to a full Equality Impact Assessment, complete ONE of the following :	
6.8.1 Policy Officer's/Assessor's reasons for deciding there is insufficient resource to proceed (eg insufficient time, staff, competing priorities, etc):	
n/a	

Official - Open

6.8.2 Policy Officer's/Assessor's reasons and evidence why it is not necessary to do an assessment on this policy (eg no adverse equality impacts likely within or between equality groups):

no adverse equality impacts likely within or between equality groups

6.9 Advice taken?

6.9.1 Has advice been taken from the Equality & Diversity Department?

YES/NO

6.9.2 Date advice taken and contact name within E&D Department

Equality and Diversity Officer 07/05/15

6.10 What was the advice provided or reason as to why advice was not sought?

Full EIA not required

(6.11 - 6.13 to be completed/verified by Departmental Head / Function Owner or appropriate Chief Officer)

6.11 What level of risk would the organisation be exposed to by not proceeding with an assessment?

Reason to support decision :

No additional impact identified that requires a full assessment

6.12 Decision whether to proceed with assessment and supporting comments

Reason to support decision :

Deadline for completing the assessment or deferred proposed

Date

6.13 Decision approval by Departmental Head / Function Owner or appropriate Chief Officer:

Name: STORM business manager

Position held: STORM business manager

Date: 11/12/2014

Once completed an electronic copy of this completed form must be sent to Policy Admin