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| **Function** | **Secure an efficient and effective police for their area** | | | | | | | **Appoint the Chief Constable, hold them to account for running the force, and if necessary dismiss them** | | | **Bring together community safety and criminal justice partners, to make sure local priorities are joined up** | | |
| **Activity** | **General correspondence and handling of complaints from the general public** | **Briefings from the Force, daily operational update, occasional daily management meeting attendance, Police Station Visits** | **Weekly CC / PCC meetings AGG meetings**  **CIMS briefings**  **Regional PCC meetings**  **Quarterly Civil Litigation Meetings** | **Administration of Police Appeals Tribunal (PAT) appeals** | **Provision of financial support for officers legal representation coroner’s inquest** | **Appointment of Volunteers** | **Dip sampling complaint cases by the JASC committee** | **Recruitment and vetting process for Chief Constable** | **Management of Chief Constable’s contract of employment** | **Handling complaints against the Chief Constable** | **Grants and commissioned services** | **Emerging Trends North and South Meeting** | **Victim & Witness Forum** |
| **Purpose for processing personal data** | To be responsive and respond to queries / complaints from the public – good organisational practice. | Secure an efficient and effective police force. | Holding the force to account. | To administer the Appeal under the Police Appeals Tribunal Rules 2012. | To provide legal support to officers and staff at coroner’s inquests and for legal proceedings. | To appoint volunteers to committees and panels to support the work of the PCC. | Audit and holding Force to account. | To appoint a legally required Chief Constable. | General management of contract. | Maintaining complaints.  Legal requirements. | To evaluate and award PCC grants and/ or commissioned services. | Holding Force to account. | Holding the Force to account. |
| **Legal basis for processing personal data** | Public task under the Police Reform & Social Resp Act 2011. | Public task under the Police Reform & Social Resp Act 2011. | Public task under the Police Reform & Social Resp Act 2011. | Public task under the Police Appeals Tribunal Rules 2012. | Public task under Section 88(4) of the Police Act 1996 and paragraph 14 of Schedule 1 of the PRSRA. | Legitimate interests. | Public task under the Police Reform & Social Resp Act 2011 – holding the force to account. | Public task under the Police Reform & Social Resp Act 2011. | Public task under the Police Reform Act 2011. | Public task under the Police Reform & Social Resp Act 2011 and the Police Reform Act 2002. | Public task under the Police Reform & Social Resp Act section 9 (crime and disorder grant.)  Performance of a contract (if grant or contract is awarded.) | Public task under the Police Reform and Social Responsibility Act 2011. | Public task under the Police Reform and Social Responsibility Act 2011. |
| **Condition for processing special category data or criminal conviction data** | Consent;  Substantial public interest; Legal claims;  Made public;  Vital interests; or  Archiving purposes. | Substantial public interest; Legal claims;  Made public;  or  Archiving purposes. | Substantial public interest; Legal claims;  Made public;  or  Archiving purposes. | Necessary for the establishment, exercise or defence of legal claims; or  Consent. | Consent;  Substantial public interest; Legal claims;  Made public;  or  Archiving purposes. | Article 9(2)(b) (obligations in employment law) and Article 9(2)(h) for assessing work capacity. | Substantial public interest (necessary for the exercise of a protective function.) | Article 9(2)(b) (obligations in employment law) and Article 9(2)(h) for assessing work capacity. | Consent;  Obligations in employment law;  Necessary in public interest. | Consent;  Substantial public interest; Legal claims;  Made public;  Vital interests; or  Archiving purposes. | Not applicable | Substantial public interest; Legal claims;  Made public;  or  Archiving purposes. | Substantial public interest; Legal claims;  Made public;  or  Archiving purposes. |
| **Categories of data subjects** | Members of the public and any data subjects mentioned in correspondence. | Victims,  Offenders and their family members. | Victims,  Offenders and their family members. | Police officers and any other data subjects involved in appeal. | Police officers and staff. | Volunteer applicants. | Members of the public, police officers (for PAT appeals.) | Applicants for role of Chief Constable. | Chief Constable. | Members of the public. | Individuals that apply for grants, individuals that work at an organisation applying for a grant or providing a service. | Victims,  Offenders and their family members. | Victims,  offenders and their family members. |
| **Types of personal data – what categories are we processing?** | **Personal**  Name,  gender,  age,  marital status, nationality,  address,  email address,  telephone number,  family information and any personal data contained in correspondence.  **Special**  Any depending on circumstance. | **Personal**  Names,  Gender,  Age,  Marital status, Nationality,  Addresses  **Criminal**  Prosecutions, warnings, arrests and  Cautions.  **Special**  Any depending on circumstances. | **Personal**  Names  gender,  age,  marital status, nationality and addresses  **Criminal**  Prosecutions, arrests, warnings and cautions.  **Special**  Any depending on circumstances. | **Personal**  Name,  gender,  age,  marital status,  address,  email address,  telephone no and details of case.  **Special**  Any depending on circumstances. | **Personal**  Name, gender,  age,  marital status,  nationality, email address,  telephone no  address and details of case.  **Special**  Any depending on circumstances. | **Personal**  Name, address  Nationality and referees contact details.  **Special**  Medical information (sickness absence and disability) and equal opportunities information.  **Criminal**  Criminal convictions, arrests or cautions. | **Personal**  Name, address, e-mail, telephone and details of complaint – could be medical, family, etc.  **Special**  Any depending on circumstances. | **Personal**  Name, address, nationality, family, referees, contact details and bank details.  **Special**  Medical information (sickness absence and disability) and equal opportunities information.  **Criminal**  Criminal convictions, arrests or cautions. | **Personal**  Name, address, nationality, personal details for regular vetting, including details of others in household and bank details  (See Staff Privacy Notice for full list.)  **Special**  Medical information (sickness absence and disability) and equal opportunities information.  **Criminal**  Criminal convictions, arrests or cautions. | **Personal**  Name, address, email, telephone, details of complaint – could be medical, family, etc.  **Special**  Any depending on circumstances. | **Personal**  Name, job title, address, email address, telephone no and bank account details. | **Personal**  Name, gender, age, marital status, nationality and addresses.  **Criminal**  Prosecutions, arrests, warnings and cautions.  **Special**  Any depending on circumstances. | **Personal**  Name, gender, age, marital status, nationality and addresses.  **Criminal**  Prosecutions, arrests, warnings and cautions.  **Special**  Any depending on circumstances. |
| **How personal data is collected** | Via letters, emails, in social media, website and telephone calls. | Meetings, minutes, briefings via email and access to the Intranet. | Meetings, documents and shared briefings via email. | From the Force to the OPCC via the Professional Standards Department File. | From police, police force unions or individual. | Vetting form, application form and equal opportunities form. | Access to Centurion on force systems. | Vetting form, application form, equal opportunities form and medical form. | From the application form,  vetting forms, appraisals and former employer(s). | Complaint in writing, via telephone phone or e-mail. | Via submission of electronic documents sent via email. | Meeting papers, attendance at meetings, by e-mail and hard copy. | Meeting papers, attendance at meetings, by e-mail and hard copy. |
| **Whether data subject’s consent needs to be obtained** | No – only required on occasion to share personal data with police and/or for special category if necessary. | No. | No. | No – only for special category if necessary. | No – only for special category if necessary. | No. | No. | No. | No - only for special category if necessary. | No - only for special category if necessary. | No. | No. | No. |
| **Who personal data is shared with** | Where necessary, with the police force. | Not shared. | Not shared. | Chair of Police Appeals Tribunal and members of the Joint Audit and Standards Committee receive a verbal update on misconduct cases. | Third party legal advisors and experts. | Police Vetting Unit and Police Human Resources. | Not Shared. | Police Vetting Unit, Police Human Resources, the  Home Secretary, the Police and Crime Panel, the College of Policing and  Independent interview panel members. | Police Vetting Unit and Police Human Resources. | Police Professional Standards Department,  Independent Office of Police Conduct and Police and Crime Panel. | Not shared. | Not shared outside of OPCC. | Not shared outside of meeting. |
| **Whether the personal data is transferred outside EEA** | No | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. |
| **Sharing protocols / agreements in place** | Policing Protocol Order 2011.  Memorandum of Understanding with Chief Constable dated 10 October 2017. | Not applicable. | Not applicable. | Home Office Protocol. | Home Office Protocol. | Information sharing protocol with Police Force dated 19/11/15. | Not applicable. | Force and the  Police and Crime Panel. | Not applicable. | Not applicable. | Not applicable. | None. | None. |
| **Whether personal data is used for another purpose** | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. |
| **How long personal data is held (Retention period)** | **See Retention Schedule** | | | | | | | | | | | | |

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| **Function** | **Appointment and Management of OPCC staff** | | | **Obligations of public bodies** | | | | **Other** | | | |
| **Activity** | **Recruitment and vetting process (excluding Chief Constable and volunteers)** | **Management of OPCC staff contracts of employment and day to day employment of staff** | **Handling complaints against OPCC staff** | **Handling requests for information (subject access or FOI)** | **Handling complaints against the PCC** | **Communications – email/ Newsletter/ Marketing** | **Consultations and surveys** | **Media enquiries** | **Photographs and filming** | **OPCC website** | **Visits to the OPCC office** |
| **Purpose for processing personal data** | Organisational management  PCC is required to appoint a Chief Executive and therefore staff. | Good organisational practice, processing claim forms and access to contact details e.g. telephone no.  (See Staff Privacy Notice for detail.) | Policy to deal with complaints through outlined process. | Responding to information requests. | Legal requirement to deal with complaints. | E-mail list for sending newsletter. | Voluntary responses to consultations. | To reply to media enquiries. | As described in consent form (generally for publicity purposes.) | Maintain and monitor performance, uphold network security and make improvements to website. | Security, for fire safety purposes and to enable efficient functioning of the office. |
| **Legal basis for processing personal data** | Contract. | Contract, legal obligation and legitimate interests. | Public task. | Legal obligation under DPA 2018, FOIA 2000 or EIR 2004. | Public task under the Police Reform Act 2002 and Elected Local Policing Bodies (Complaints and Misconduct) Regulations 2012. | Consent. | Consent. | Public task. | Consent. | Legitimate interests (the running of the website, provision of administration and IT services, and network security.) | Legitimate interests (security, for fire safety purposes and to enable efficient functioning of the office.) |
| **Condition for processing special category data or criminal conviction data** | Article 9(2)(b) (obligations in employment law) and Article 9(2)(h) for assessing work capacity as an employee. | Consent;  Obligations in employment law;  Necessary in public interest | Consent;  substantial public interest; legal claims; made public; vital interests; or  Archiving purposes. | Not applicable. | Consent;  substantial public interest; legal claims;  made public;  vital interests; or  archiving purposes. | Not applicable. | Consent. | Not applicable. | Not applicable. | Not applicable. | Not applicable. |
| **Categories of data subject** | Job applicants. | Employees and their family / household. | Members of the public who make a complaint. | Members of the public. | Members of the public who make a complaint. | Website visitors who sign up to mailing list. | Participants of consultations. | Media representative. | Individuals who are filmed/ have their photo taken by OPCC (generally attendees at events.) | Visitors to OPCC website. | Dignitaries;  members of the public;  journalists;  external training providers;  job applicants;  suppliers and tradespeople; and  stakeholders and key partners. |
| **Types of data** | **Personal**  Name, address, telephone, e-mail address, referees, contact details and nationality.  **Special**  Medical information (sickness absence and disability), equal opportunities and information.  **Criminal**  Criminal convictions, arrests or cautions. | **Personal**  Name, car details, address, telephone, e-mail, personal details for regular vetting (including details of others in household) and bank details.  (See Staff Privacy Notice for full list.)  **Special**  Medical information (sickness absence and disability) and equal opportunities information.  **Criminal**  Criminal convictions, arrests or cautions. | **Personal**  Name, address, e-mail, telephone and details of complaint – could be medical, family, etc.  **Special**  Any depending on circumstances. | **Personal**  Name, gender, marital status, address, e-mail address and telephone number.  ID documents to verify identity only (not kept.) | **Personal**  Name, address, e-mail, telephone and details of complaint – could be medical, family, etc.  **Special**  Any depending on circumstances. | **Personal**  Name, e-mail address and postal address. | **Personal**  Name, e-mail address, locality, age range and gender.  **Special**  Ethnicity. | **Personal**  Name, telephone no, e-mail address, organisation and details of enquiry. | **Personal**  Photo / film images, name, age and  e-mail address (optional.) | **Personal**  IP address, time zone setting and location.  **Other (non-personal)**  Browser type and version, browser plug-in types and versions, and operating system and other technical data. | **Personal**  Name, organisation and discussion topics. |
| **How personal data is collected** | Application form, medical form, vetting form and equal opportunities form. | Original application form, telephone lists, mileage, expense and overtime forms, vetting forms, appraisals and former employer. | Through complainant contact and details obtained from member of staff concerned. | Request via post, telephone, email or social media. | Through complaint contact – letter, e-mail or telephone. | Sign up to the newsletter. | Completion of consultation via web survey or paper version and focus groups (telephone or face to face.) | Enquiry via post, telephone, email or social media. | In photographs and films and via consent form. | Google analytics and Cookies. | Diary entries and sign in book. |
| **Whether data subject’s consent needs to be obtained** | No. | No unless necessary for special category processing. | No. | No. | No. | Yes. | Yes. | No. | Yes (parental consent requested if under 16.) | No. | No. |
| **Who personal data is shared with** | Police Vetting Unit and Police HR.    **Senior post holders only**: Police and Crime Panel (as they have a statutory role in relation to the review of senior appointments).  College of Policing (if we use their services to aid the recruitment process).  Independent interview panel members. | Police, Finance, HR and Vetting | Police or partner agencies if necessary and Police HR. | ICO (if requester makes complaint.)  Other third parties if it is necessary to respond to request (such as where they hold relevant information that we are required to provide.) | Police and Crime Panel (who handle complaints against PCC.)  Independent Office of Police Conduct (IOPC.) | MailChimp. | Survey monkey. | Police or other agencies if necessary to establish facts. | Photo/film will be made available as described in consent form (e.g. to media via press release, monthly newsletter and social media channels.) | Google Analytics  Website host (Formation Media.) | Not applicable. |
| **Whether the personal data is transferred outside EEA** | No. | No. | No. | No. | No. | Yes, to MailChimp in the US (signed up to US Privacy Shield Framework.) | Yes, to SurveyMonkey in the US (signed up to US Privacy Shield Framework.) | No. | No. | No. | No. |
| **Sharing protocols / agreements in place** | The memorandum of understanding covers these areas. | The memorandum of understanding covers these areas. | None required, in-house activity. | Not applicable. | Joint Working Protocols and Complaints Flowchart in place. | Checked compliance to GDPR - contract in place. | Checked compliance to GDPR - contract in place. | Not applicable. | Not applicable. | Contracts in place with Google Analytics  and Formation Media. | Not applicable. |
| **Whether personal data is used for another purpose** | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. | No. |
| **How long personal data is held (Retention period)** | See Retention Schedule. | | | | | | | | | | |

**Additional information and documents**

**Data Controller Details**

Warwickshire Office of the Police and Crime Commissioner

Address: 3 Northgate Street, Warwick CV34 4SP

E-mail: opcc@warwickshire.pnn.police.uk

Tel: 01926 412322

Data Protection Officer: Warwickshire Legal Services (email: [wls@warwickshire.gov.uk](mailto:wls@warwickshire.gov.uk), telephone: 01926 412859)

**Key legislation for public tasks carried out by PCC**

Under the terms of the Police Reform and Social Responsibility Act 2011, PCCs must:

* secure an efficient and effective police for their area;
* appoint the Chief Constable, hold them to account for running the force, and if necessary dismiss them;
* set the police and crime objectives for their area through a police and crime plan;
* set the force budget and determine the precept;
* contribute to the national and international policing capabilities set out by the Home Secretary;
* bring together community safety and criminal justice partners, to make sure local priorities are joined up; and
* conduct a precept consultation and have a Police and Crime Plan.

**Technical and organisational security measures**

Our Information Security Incident Reporting Procedure is available here: [Information Security Incident Reporting Procedure](https://www.warwickshire-pcc.gov.uk/wp-content/uploads/2018/10/Information-Security-Incident-Reporting-Procedure-May-2018.pdf?x94727)

**Information requests and policies**

Our Subject Access Request Form is available here: [Your Right to Information](https://www.warwickshire-pcc.gov.uk/key-information/your-right-to-information/personal-data/)

Our Data Protection and Requests for Personal Information Policy is available here: [Data Protection and Requests for Personal Information Policy](https://www.warwickshire-pcc.gov.uk/wp-content/uploads/2018/08/Data-Protection-and-Requests-for-Personal-Information-Policy-July-2018.pdf?x94727)

**Privacy notices**

Our Privacy Notice for the public is available here: [Privacy Notice](https://www.warwickshire-pcc.gov.uk/policies/privacy-policy/privacy-notice-the-personal-information-we-hold-how-we-collect-it-and-the-purposes-for-which-we-use-it/)

Our Privacy Notice for staff is available from the OPCC on request.

**Consent forms**

Our consent form for photography and filming (adult) and our consent form for photography and filming (child) are available from the OPCC on request.