



Specific Privacy Notice: ChiefsNet

ChiefsNet is an access-controlled platform used by Chief Officers, their teams across UK police forces, and the NPCC to communicate information within their community. It also provides an archive of communications issued on the system since its inception in 2015.

The sensitivities around the content on ChiefsNet are predominantly around the development of policy and management of performance rather than how the limited personal data is processed within it. The definition of personal data (information relating to identifiable living individuals) is broad enough to encompass some material within minutes and decision logs. Also where an individual produces reports, updates or letters that contain their opinions or updates that information can be regarded as relating to them. That said the amount of personal data and its sensitivity are comparatively low

Version 1. 28th March 2022

Introduction

This Specific Privacy Notice has been created to make it easier for individuals to understand what personal data the NPCC processes about them, how and why it is used in connection with ChiefsNet. It is a requirement of the Data Protection Act 2018 (DPA) and UK GDPR.

It is subordinate to, and should be read in conjunction with, the NPCC's high-level Privacy Notice which can be accessed from the NPCC's internet site:

<https://www.npcc.police.uk/Info/PrivacyNotice.aspx#:~:text=This%20privacy%20notice%20tells%20you%20how%20the%20National,see%20and%20challenge%20how%20your%20data%20is%20used.>

The high-level Privacy Notice provides complete details of the rights individuals have relating to the personal data the NPCC holds about them now and any personal data we might collect about them in the future.

If an individual does not have access to the internet and require access to the high-level Privacy Notice they can contact the NPCC's Data Protection Officer who will provide a copy to them. They will also facilitate the provision of the Privacy Notice in large font, or Braille, or published in other languages.

Privacy Information

Question	Answer	DPA/UK GDPR Reference
<p>1. Who is the Controller (the person who determines the purpose and means by which an individual's personal data is processed on ChiefsNet) and what are their contact details?</p>	<p>National Police Chiefs' Council 10 Victoria Street London SW1H 0NN</p> <p>Email: info@npcc.police.uk</p> <p>ICO Registration number: ZA495495</p>	<p>Section 44(1)(a)</p> <p>Article 13(1)(a)</p> <p>Article 14(1)(a)</p>
<p>2. What are the contact details of the NPCC's Data Protection Officer?</p>	<p>Data Protection Officer NPCC 10 Victoria Street London SW1H 0NN</p> <p>Email: dpo@npcc.police.uk</p>	<p>Section 44(1)(b)</p> <p>Article 13(1)(b)</p> <p>Article 14(1)(b)</p>
<p>3. For what purpose(s) is the personal data processed by the NPCC on ChiefsNet?</p>	<p>For one or more Law Enforcement Purposes – defined as the prevention, investigation, detection or prosecution of criminal offences, the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security, or the policing purpose.</p> <p>And for one or more General Purpose - to administer access to ChiefsNet, to provide a means of communication within the ChiefsNet community, and to provide an archive of communications issued.</p>	<p>Section 44(1)(c)</p> <p>Article 13(1)(c)</p>
<p>4. For General Processing what personal data is processed by the NPCC on ChiefsNet?</p>	<p>The personal data is predominately limited to the names, post, organisation and contact details of police personnel contributing content to ChiefsNet, their contributions and those participating in meetings whose details are recorded within minutes and papers published on ChiefsNet. There is unlikely to be material that contains criminal offence data or special category data or personal data subject to sensitive processing, save for high profile cases already in the public domain.</p>	
<p>5. For General Processing how is personal data processed by the NPCC on ChiefsNet?</p>	<p>Information, some of which is personal data, is created by Chief Officers, Committees, Portfolios and National Units. All information is signed off through the NPCC coordination committees and NPCC Strategic Hub specific departments for publication on ChiefsNet.</p>	

	<p>Upon receipt within the Strategic Hub the information is processed as follows:</p> <ol style="list-style-type: none"> 1. It is placed in a secure folder within the Strategic Hub's SharePoint. 2. A request from the business support team will be sent to the Chair of each coordination committee to sign off before publication or strategic hub lead. 3. A copy is uploaded by the business support manager and team onto ChiefsNet. 4. The information is published on ChiefsNet ready for authorised users to view. 5. Authorised users are able to download copies of information published on ChiefsNet. 6. The information remains on ChiefsNet until it is deleted once it is no longer required. 7. Copies of the information held by the Strategic Hub is deleted. 8. A daily/weekly summary is issued by the Strategic Hub via email to alert ChiefsNet users of the latest updates added to ChiefsNet. They can use links from within the email to access ChiefsNet. 	
6. For General Processing on ChiefsNet, if personal data is obtained by the NPCC from someone else what are the categories of personal data collected?	Not applicable	Article 14(1)(d)
7. For General Processing on ChiefsNet, if personal data was obtained by NPCC from someone else from who or where was it obtained by the NPCC?	Not applicable	Article 14(2)(f)
8. For General Processing on ChiefsNet, are individuals required to provide their personal data under a statutory or contractual requirement, or a requirement necessary to enter into a contract, or are they obliged to provide it?	No.	Article 13(2)(e)
9. For General Processing on ChiefsNet, is an individual's personal data used for automated decision-making, including profiling? ¹	No.	Article 13(2)(f) Article 14(2)(g)

¹ Automated decision-making is where the NPCC makes a decision about an individual without human intervention that has a legal or similar effect on them.

<p>10. For General Processing on ChiefsNet, if an individual's personal data is used for automated decision-making, including profiling what logic will be involved and what significance and consequences will there be for them from the automated decision-making?</p>	<p>Not applicable.</p>	<p>Article 13(2)(f) Article 14(2)(g)</p>
<p>11. For Law Enforcement Processing on ChiefsNet, what are an individual's rights under the DPA?</p>	<p>Individuals have the following rights under the DPA:</p> <ul style="list-style-type: none"> • Right of access to their personal data • Right of rectification of their personal data • Right of erasure of their personal data or the restriction of its processing • Right to lodge a complaint with the Information Commissioner <p>Full details of those rights and how to exercise them can be found in the NPCC's high-level Privacy Notice which can be found on the NPCC website. It can also be obtained from the NPCC's Data Protection Officer.</p>	<p>Section 44(1)(d)(i) Section 45 Section 44(1)(d)(ii) Section 46 Section 44(1)(d)(iii) Section 47 Section 44(1)(e) Section 51</p>
<p>12. For General Processing on ChiefsNet what are individuals' rights under the UK GDPR?</p>	<p>Individuals have the following rights under the UK GDPR:</p> <ul style="list-style-type: none"> Right to be informed Right of access Right of erasure Right to restriction of processing Right to data portability Right to object Right not to be subject of automated decision-making <p>Full details of those rights and how to exercise them can be found in the NPCC's high-level Privacy Notice which can be found on the NPCC website. It can also be obtained from the NPCC's Data Protection Officer.</p>	<p>Article 13(2)(b) Article 14(2)(c)</p>
<p>13. Is there any other information that is necessary to enable an</p>	<p>No.</p>	<p>Section 44(2)(d) Section 44(3)(a)</p>

individual to exercise any of rights listed at 4 above?		
14. What are the NPCC's legal bases for processing the personal data on ChiefsNet?	<p>The NPCC's legal bases for processing personal data is based on its Common Law Policing Purpose of protecting life and property, preserving order, preventing the commission of offences, bringing offenders to justice, and any duty or responsibility of the police arising from common or statute law.</p> <p>In terms of Section 35(2) of the DPA the processing is necessary for the performance of a task carried out for a Law Enforcement purpose by the NPCC or another competent authority.</p> <p>And the following for General Processing:</p> <p>a) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.</p>	<p>Section 44(2)(a) Section 35(2)</p> <p>Article 13(1)(c)</p> <p>Article 14(1)(c)</p>
15. For General Processing on ChiefsNet, if the NPCC relies on individuals' consent to be the legal basis for processing the personal data can they withdraw that consent?	Yes, individuals may withdraw their consent at any time. However, that withdrawal does not affect the lawfulness of any processing of the personal data before the withdrawal of consent.	<p>Article 13(2)(c)</p> <p>Article 14(2)(d)</p>
16. Who could NPCC disclose an individual's personal data on ChiefsNet to?	Users of ChiefsNet	<p>Section 44(2)(c)</p> <p>Article 13(1)(e)</p>
17. For General Processing on ChiefsNet, does the NPCC intend to transfer the personal data out of the U.K. or to an international organisation?	No	<p>Article 13(1)(f)</p> <p>Article 14(1)(f)</p>
18. For General Processing on ChiefsNet, if the NPCC intends to transfer the personal data out of the U.K. or to an international organisation what safeguards are there to protect the personal data?	Not Applicable	<p>Article 13(1)(f)</p> <p>Article 14(1)(f)</p>
19. How long is personal data retained by the NPCC on ChiefsNet?	An initial seven year period, then reviewed for potential disposal or further retention. A review, retention and deletion policy is currently being	<p>Section 44(2)(b)</p> <p>Article 13(2)(a)</p>

	developed for ChiefsNet which will set out the criteria for retention beyond seven years.	Article 14(2)(a)
20. Who can an individual lodge a complaint with if they are unhappy about the way their personal data is processed by the NPCC?	<p>They may lodge a complaint with the Information Commissioner's Office. Their contact details are:</p> <p>Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Telephone: 0303 123 1113</p> <p>Website: www.ico.org.uk</p> <p>They may wish to initially raise any concerns with the NPCC Data Protection Officer.</p>	<p>Article 13(2)(d)</p> <p>Article 14(2)(e)</p>