From: S.40(2) [redacted]
To: S.40(2) [redacted]
Cc: S.40(2) [redacted]
Subject: New processes - Data minimisation
Date: 14 February 2025 11:03:00
Attachments: CRU_Referral_Criteria_and_Form_v9.6.docx

Team,

Following on from the meeting on Friday we have decided on the following change in process and record keeping:

1. The referral form will continue to request the applicants name. We have risk assessed the need to keep a record of the name on our case management system only, and feel the benefit to intelligence led policing outweighs removal at this time. See attached tweaked referral form S.31(1) [redacted]
2. Initial acknowledgement (CRP) contains the name of the applicant in the body of the email, not in the subject line. Additional form of words to be included in the acknowledgement email to address the use of applicant name -
   "Applicants name is included in the acknowledgement email as a reference for forces only, any future correspondence will only quote the CRU reference number. Please do not duplicate the applicants name in any future correspondence and use only the CRU reference number"
   ***S.4 [redacted] can you please update the S.3 [redacted] templates to reflect**
   ***Prior to moving across to new S.31 [redacted] system please ensure this is added to the CRP email**
3. Any additional CRU generated emails will only contain the CRU reference number and will NOT include the applicant name. This is only for our case management system.
4. The referral form and initial acknowledgement email (CRP) can be added to S.31 [redacted] but any acknowledgement returns should not be added to S.31 [redacted] (only record the force) and deleted the email.
5. Ensure when adding any correspondence from forces to S.31 [redacted] applicant names are removed from the subject line and email content.
6. If adding attachments to our advice (either previous advice or correspondence from forces) ensure any names on the attachments are removed. Best practice would be to include our previous advice in the body of the new email or copy and paste advice to a new Word doc.

7. Forces will be sent the new referral form and updated CRU processes with the reasons behind the decision making.
8. S.40([redacted] will update the CRU process and the reasons why the name is collected and processed initially.
9. To assist backlog and prevent logging of very simple questions, for example a referral asking if s40(2) should be applied due to low numbers, Email the force back and ask them to call us to discuss, do not log the request at that time. Care needs to be taken that these are only quick wins, and do not result in follow up emails etc.

Why are we doing this:

1. To ensure data minimisation in our correspondence and prevent personal data from

being processed unnecessarily.

2. Prevents our advice emails from being circulated to others in force or externally with applicants names on - potential for a data breach.
3. Reduces the volume of information captured by SAR's.
4. Complies with the applicant blind principle of the FOIA

Hope the above all makes sense, please let me know if I have missed anything, or any other suggestions ☺

S.