



## FREEDOM OF INFORMATION REQUEST

Please note the text of this request has been reproduced exactly as received.

**FOI Reference number: FOI 28/2023**

**Date: 28 July 2023**

### **Request:**

I am writing to make a formal request for information under the provisions of the Freedom of Information Act 2000. I kindly request that you provide me with the following information:

1. A copy of your organisation's Records of Processing Activity (ROPA) as defined in Article 30 of the UK General Data Protection Regulation (UK GDPR).

**Answer:** Please see the document attached as Annex A. Please note this document is currently under review.

2. A copy of all legitimate interest assessments conducted by your organisation where you rely on Article 6(1)(f) legitimate interests as your lawful basis for processing.

**Answer:** The NI Policing Board does not hold any information falling within the scope of this question.

3. A copy of all privacy impact assessments conducted by your organisation.

**Answer:** The NI Policing Board does not hold any information falling within the scope of this question.

4. A copy of all data protection impact assessments conducted by your organisation.

**Answer:** The NI Policing Board has not yet completed its search for these records. A response to this question will be provided as soon as possible.

5. A copy of all international transfer risk assessments conducted by your organisation.

**Answer:** The NI Policing Board does not hold any information falling within the scope of this question.

6. A recent copy of your organisation's data protection compliance assessment using the Information Commissioner's Office (ICO)'s accountability framework template. If you are using your own standards to monitor compliance with the Data Protection 2018, please provide me with copy of it.

**Answer:** The NI Policing Board does not hold any information falling within the scope of this question.

7. A copy of your organization's data protection policy.

**Answer:** We can confirm that the NI Policing Board holds the information you requested. However we are withholding that information since we consider that the exemption under section 21 (Information accessible by other means) applies to it. As this is an absolute exemption the Board is not required to carry out a public interest test. A copy of our Data Protection Policy has been published on the Board's website and can be accessed via the following link -

[NIPB-Data-Protection-Policy.pdf \(nipolicingboard.org.uk\)](https://nipolicingboard.org.uk/NIPB-Data-Protection-Policy.pdf)

8. A copy of your organization's subject access request policy, procedures, and processes, including any guidance material such as folder structure, naming conventions, and redaction guides.

**Answer:** We can confirm that the NI Policing Board holds the information you requested. However we are withholding that information since we consider that the exemption under section 21 (Information accessible by other means) applies to it. As this is an absolute exemption the Board is not required to carry out a public interest test. A copy of our Subject Access Request Policy has been published on the Board's website and can be accessed via the following link –

[nipb-data-protection-response-management-policy.pdf \(nipolicingboard.org.uk\)](https://nipolicingboard.org.uk/nipb-data-protection-response-management-policy.pdf)

9. A copy of your organisation's privacy notices, including but not limited to employees, customers, ministers, special advisors (SPADs), complaints, NEDS, visitors, and CCTV.

**Answer:** We can confirm that the NI Policing Board holds the information you requested. However we are withholding that information since we consider that the exemption under section 21 (Information accessible by other means) applies to it. As this is an absolute exemption the Board is not required to carry out a public interest test. Copies of our Privacy Notices have been published on the Board's website and can be accessed via the following link –

[Privacy Notices | Northern Ireland Policing Board \(nipolicingboard.org.uk\)](https://nipolicingboard.org.uk/Privacy-Notices)

10. A copy of your organisation's due diligence questions for vendor management such as independent data controllers or processors.

**Answer:** The NI Policing Board does not hold any information falling within the scope of this question.

If you have queries about this request or the decision please contact the Board quoting the reference number above. If you are unhappy with the service you have received and wish to make a complaint or request a review you should write to the Board's Chief Executive at the following address:

Northern Ireland Policing Board  
James House  
Block D  
2 – 4 Cromac Avenue  
The Gasworks  
Belfast  
BT7 2JA

Email: [foi@nipolicingboard.org.uk](mailto:foi@nipolicingboard.org.uk)

You should contact the Board within 40 working days of this response.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner. Generally, the Information Commissioner's Office cannot investigate or make a decision on a case unless you have exhausted the complaints procedure provided by the Board. The Information Commissioner can be contacted at the following web link –

[www.ico.org.uk/foicomplaints](http://www.ico.org.uk/foicomplaints)

or in writing at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Telephone: - 0303 1231114

Email: - [ni@ico.org.uk](mailto:ni@ico.org.uk)

Please be advised that Policing Board replies under Freedom of Information may be released into the public domain via our website @ [www.nipolicingboard.org.uk](http://www.nipolicingboard.org.uk).

Personal details in respect of your request have, where applicable, been removed to protect confidentiality.

Controller & Data Protection Officer Contact Details
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Address	Northern Ireland Policing Board James House Block D 2 – 4 Cromac Avenue The Gasworks Belfast BT7 2JA
E-mail	<a href="mailto:Data.Protection@nipolicingboard.org.uk">Data.Protection@nipolicingboard.org.uk</a>
Telephone	028 90408500

Branch	Information Asset Description	Asset Location	Retention Period	Description of Personal Data held	Personal Data Supplied By	Is any of the Personal Data 'Special Category' or 'Criminal Offence' Data?	Purpose & Legal Basis for Processing	Is any Personal Data 'processed' by a third party?	Identify role of third party	Name the third party and describe how the data is being shared - contract or Data Sharing Agreement
Police Administration	Case Files	Physical files - Secure Store Electronic records - restricted access	Destroy - 2 years from death of individual	Contact details; bank details; employment history; special category data.	potential customers; existing customers; third party controller.	YES	RUC Pension Regulations 1998, Police Pensions (NI) Regulations 2009, Police Pension Regulations (NI) 2015, PSNI and PSNI Reserve (Injury Benefit) Regulations 2006	Yes	Joint Controller & Processor	SMP/IMR DOJ PSNI
Police Administration	Police Administration Legal Cases and Complex Correspondence Cases	Physical files - Secure Store Electronic records - restricted access	Destroy - 2 years from death of individual	Contact details; bank details; employment history; special category data.	existing customers; third party controller.	YES	RUC Pension Regulations 1998, Police Pensions (NI) Regulations 2009, Police Pension Regulations (NI) 2015, PSNI and PSNI Reserve (Injury Benefit) Regulations 2006	Yes	Joint Controller & Processor	SMP/IMR DOJ PSNI NIPB's Legal Advisors
Police Administration	Police Pension Board Papers Scheme Advisor Board Papers Pension Scheme Management Papers	Physical files - Secure Store Electronic records - access controls	10 years	employment details	third party controller	YES	RUC Pension Regulations 1998, Police Pensions (NI) Regulations 2009, Police Pension Regulations (NI) 2015	No	n/a	n/a

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Communications Branch	Records Management Files - Request Tracking Records relating to FOI / EIR / DPA requests.	Electronic - access controls	Close at end of calendar year - destroy after 10 years	Contact details	customer	No	Legal Obligation - FOIA 2000 / EIR 2004 / DPA 2018 /UK GDPR	No	n/a	n/a
Communications Branch	Records Management Files - Contact / Engagement lists	Electronic - access controls	Review Consent agreement after 5 years	Contact details	external individuals	No	Consent	No	n/a	n/a
Communications Branch	Communications Files - Image library records. Images of long term value to the Board to be maintained for permanent preservation/PRONI Review. Images to be transferred to PRONI to be transferred as soon as possible after capture. All other images of short term value to the Board should be destroyed.	Electronic - access controls	Date of picture being taken - Long Term Value 5 years - PRONI appraisal Short Term Value Destroy after 5 years	Images	external individuals	No	Consent	No	n/a	n/a
Communications Branch	Communications Files - Final pdfs of publications produced by the board (or hard copy if no pdf exists)	Electronic - access controls Physical copies - secure store	Destroy 7 Years after Closure	Images	Data Subject	No	Consent	No	n/a	n/a

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Police Human Rights and Professional Standards	Police Appeals Tribunal Records	Physical files - Secure Store Electronic records - access controls	Tribunals conducted under the Royal Ulster Constabulary (Appeals) Regulations 2000 - end of proceedings - 7 years. Destroy Tribunals conducted under the Police Appeals Tribunals Regulations (NI) 2016 - end of proceedings - 2 years. Destroy	contact details; bank details; employment history; special category; criminal offence.	Appellant; third party controller	Yes	Public Task - RUC (Appeals) Regulations 2000 & Police Appeals Tribunals Regulations (Northern Ireland) 2016			PSNI; Appellant; Tribunal Panel Members; Stenographer
Police Human Rights and Professional Standards	Contact lists	Electronic records - access controls	1 year after end of tenure	contact details	panel members	No	Public Task - RUC (Appeals) Regulations 2000 & Police Appeals Tribunals Regulations (Northern Ireland) 2016			

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Police Performance Branch	Contact / engagement lists	Electronic records - access controls	Review Consent agreement after 5 years	contact details	data subject		consent			



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Engagement Branch	Custody Visitor and Community Observer Management Files	Physical files - Secure Store Electronic records - access controls	Close at end of financial year, 7 years (destroy)	contact details	Scheme volunteers		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			
Engagement Branch	Appointment of Custody Visitors and Community Observers - unsuccessful appointment documents, including applications, assessment papers, closure of competitions	Physical files - Secure Store Electronic records - access controls	Close of competition, 3 year (destroy)	contact details	unsuccessful candidates		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			
Engagement Branch	Appointment of Custody Visitors and Community Observers - successful appointment documents, including applications, assessment papers, closure of competitions	Physical files - Secure Store Electronic records - access controls	End of tenure, 3 years (destroy)	contact details	successful candidates		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			

Engagement Branch	Complaints against Custody Visitors / Independent Observers - (Register of Complaints) Complaints against Custody Visitors/independent Observers (case papers etc)	Physical files - Secure Store Electronic records - access controls	Register of Complaints - Close at end of calendar year, 10 years (destroy) Case Papers - Close at end of calendar year, 3 years (destroy)	contact details	complainant		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			
Engagement Branch	Analytical Services (SPSS Statistics) for Custody Visiting	Electronic records - access controls	Close at end of financial year - 10 years (destroy)	Name	data subject		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			
Engagement Branch	Engagement / contact lists	Electronic records - access controls	close when superceded- 5 yrs destroy	contact details	data subject		consent			
Engagement Branch	Consultation Database	Electronic records - access controls		contact details	data subject		(ICV's) - Public Task - Article 73 of the Police (Northern Ireland) Act 2000 - CV (ICO's) Public Task - Police (Recruitment) (Northern Ireland) Regulations 2001			

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Partnership Branch	Appointment of independent PCSP Members (Also covers former DPP Appointments) - Unsuccessful appointment documents including applications, assessment papers	Physical files - Secure Store Electronic records - access controls	Closure of competition - 3 years - Destroy	contact details	unsuccessful candidates		Public Task - Justice Act (Northern Ireland) 2011			
Partnership Branch	Appointment of independent PCSP Members (Also covers former DPP Appointments) - Successful appointment documents including applications, assessment papers	Physical files - Secure Store Electronic records - access controls	End of appointment - 3 years - Destroy	Contact details; Equality monitoring	successful candidates		Public Task - Justice Act (Northern Ireland) 2011			
Partnership Branch	Contact / engagement lists	Electronic records - access controls	To Be Review	contact details	data subject		consent			
Partnership Branch	Implementation documents relating to the Police Property Fund including application forms and financial information.	Electronic records - access controls	up to 10 years	contact details	applicants		necessary for performance of a task	No		

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Finance & IT	Banking records	Electronic records - access controls	Close at end of financial year - 7 years - destroy	contact details	data subject	No	Contract - Information is necessary for the performance of a contract with the data subject. .	No		No
Finance & IT	Accounts payable records	Physical files - Secure Store Electronic records - access controls	Close at end of financial year - 7 years - destroy	contact details	data subject	No	Contract - Information is necessary for the performance of a contract with the data subject. .	No		Yes legal obligation to share information with HMRC upon receipt of legislative notice
Finance & IT	Salary records and pay remits	Physical files - Secure Store Electronic records - access controls	Close at end of financial year - 7 years - destroy	Employment details; bank details; may include special category data eg trade union membership fees	employees	Yes	Contract - Information is necessary for the performance of an employment contract with the data subject. .	No		Yes legal obligation to share information with HMRC upon receipt of legislative notice
Finance & IT	Financial Statements / summaries prepared for inclusion in the quarterly and annual reports	Physical files - Secure Store Electronic records - access controls	Close at end of financial year - 7 years - destroy	Employment details; salary details	Third Party controller	No	Legal obligation - HM Treasury guidance - Frem - section 5.3 (the Government financial reporting manual)	No		No
Finance & IT	Gifts and Hospitality Register	Physical files - Secure Store Electronic records - access controls	Close at end of financial year - 7 years - destroy	employee name	employees	No	Legal obligation - Prevention of Corruption Acts of 1906 and 1916	No		No
Finance & IT	Contact / engagement lists	Electronic records - access controls	Review Consent agreement after 5 years	contact details	data subject	No	consent	No		no
Finance & IT	Tender documents and contract management documents	Physical files - Secure Store Electronic records - access controls	End of contract - 7 years - destroy	prospective contractors; existing contractors	external contractor	No	Necessary for the performance of a contract with the data subject.	No		

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Corporate Services	Report papers used in the course of a fraud investigation	Electronic records - access controls	Retain for 10 years after conclusion of investigation - Destroy	contact details; details of alleged offence	complainant	Potentially		Possibly	Whoever is carrying out the investigation - Fraud representatives	Fraud Reps

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Corporate Services	Personal Data relating to Board Members	Electronic records - access controls	Register of interests - 6 years Destroy Current address - 6 years Destroy Bank details - 7 years Destroy	contact details	data subject	No	in connection with role and Board Member. Held with consent of the data subject	Yes	Processor	HR Connect
Corporate Services	Membership of Board Committees	Electronic records - access controls	End of Board tenure - 1 year destroy	Names of current Committee members	data subject	No	in connection with role as Board Member. Held with consent of the data subject.	No	n/a	n/a
Corporate Services	Register of Members' Interests	Electronic records - access controls	1 year after end of appt term - destroy	Declared Board Members' interests outside of NIPB business	data subject	No	in connection with role as Board Member. Held with consent of the data subject.	No	n/a	n/a
Corporate Services	Register of travel bookings	Electronic records - access controls	Close at end of Financial Year- 10 years destroy	Information on travel bookings eg name , contact details	Board Officials / data subject	No	in connection with role as Board Member. Held with consent of the data subject	Yes	Processor	Travel Agent

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Corporate Services	Correspondence Register	Electronic records - access controls	When chain of correspondence closed - 3 years destroy	contact details of correspondents	correspondent	No	In connection with NIPB business	No	n/a	n/a

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Corporate Services	Successful recruitment documents of Chief Police Officers - Chief Constable, Deputy Chief Constable and Assistant Chief Constable	Physical files - Secure Store Electronic records - access controls	Chief Constable - completion of next competition (Permanent preservation PRONI - Historical Record), Deputy Chief Constable and Assistant Chief Constable - end of employment - 3 years destroy	Successful recruitment documents of Chief Police Officers - Chief Constable, Deputy Chief Constable and Assistant Chief Constable	successful applicants		Data gathered for the purposes of a recruitment competition, and has been provided by the applicant themselves.			
Corporate Services	Unsuccessful recruitment documents of Chief Police Officers - Chief Constable, Deputy Chief Constable and Assistant Chief Constable	Physical files - Secure Store Electronic records - access controls	Closure of competition - 3 years destroy	Unsuccessful recruitment documents of Chief Police Officers - Chief Constable, Deputy Chief Constable and Assistant Chief Constable	Unsuccessful applicants		Data gathered for the purposes of a recruitment competition, and has been provided by the applicant themselves.			
Corporate Services	Written particulars of employment for Chief Police Officers - Chief Constable, Deputy Chief Constable and Assistant Chief Constable	Physical files - Secure Store Electronic records - access controls	Chief Constable - completion of next competition (Permanent preservation PRONI- Historical Record), Deputy Chief Constable and Assistant Chief Constable - until age 100 destroy	Written particulars of employment for Chief Police Officers	employees		Data gathered for the purposes of EMPLOYMENT, and has been provided by the applicant themselves.			
Corporate Services	The process of managing, undertaking or defending for or against litigation on behalf of the Board:	Physical files - Secure Store Electronic records - access controls	Conclusion of proceedings - 7 years destroy (If the case has set a major precedent offer papers to PRONI for review)	Applicant and defendant information regarding legal proceedings	Applicant and Defendant		Data gathered in the course of litigation against the Board			
Corporate Services	Successful recruitment documents including applications, assessment papers	Physical files - Secure Store Electronic records - access controls	End of employment - 3 years destroy	Information from successful recruitment applications	successful applicants		Data gathered for the purposes of a recruitment competition, and has been provided by the applicant themselves.			
Corporate Services	Unsuccessful recruitment documents including applications, assessment papers	Physical files - Secure Store Electronic records - access controls	Closure of competition - 3 years	Information from unsuccessful recruitment applications	Unsuccessful applicants		Data gathered for the purposes of a recruitment competition, and has been provided by the applicant themselves.			



Corporate Services	Written particulars of employment	Physical files - Secure Store Electronic records - access controls	Until age 100 - Destroy	Information relating to a person's employment with the Board	employees		Information relating to a person's employment with the Board, provided by the person themselves			
Corporate Services	Access NI - Original information and all copies	Physical files - Secure Store Electronic records - access controls	Until final decision about the applicant's suitability is determined. This should not exceed 6 months. Access NI will approve the retention of the disclosures for a longer period in exceptional circumstances where there is a requirement to retain so that the RQIA can have access to fulfil its statutory duties. Destroy	Personal data required by Access NI in relation to the vetting process.	prospective employees / volunteers		Data is gathered for vetting purposes relating to an individual's application for employment. Some data provided by the person themselves and some by Access NI			
Corporate Services	Access NI - record should be kept of: the date of disclosure; the name of the subject of the disclosure; the type of disclosure; the position which the disclosure was applied for; the unique number that was issued by Access NI for that disclosure; and the recruitment decision taken	Physical files - Secure Store Electronic records - access controls	Until age 100 - destroy. The records should be signed and dated by a person of significant authority and seniority who could represent the organisation in court	Personal data required by Access NI in relation to the vetting process.	prospective employees / volunteers		Data is gathered for vetting purposes relating to an individual's application for employment. Some data provided by the person themselves and some by Access NI			
Corporate Services	Current address details	Physical files - Secure Store Electronic records - access controls	End of employment - 6 years destroy	contact details	employees		Gathered and processed for employment purposes			
Corporate Services	Career History/Consolidated Employment Records	Physical files - Secure Store Electronic records - access controls	Until age 100 - destroy	employment history	data subject		Gathered and processed for employment purposes			

Corporate Services	<p>Medical reports of those exposed to a substance hazardous to health including:</p> <ul style="list-style-type: none"> <li>- Lead (Control of Lead at Work Regulations 1980);</li> <li>- Asbestos (Control of Asbestos at Work Regulations 1996); and</li> <li>- Compressed Air (Work in Compressed Air Regulations (NI) 2004). Medical reports of those exposed to a substance hazardous health including Radiation (Ionising Radiation Regulations 1985). Noise (Noise At Work Regulations (NI) 1990. Control Of Substances Hazardous to Health (COSHH NI Regs 2003)</li> </ul>	Physical files - Secure Store Electronic records - access controls	Date at which last entry was made - 40 years destroy	Information on individuals exposed to a hazardous substance	data subject		<p>Public task -</p> <ul style="list-style-type: none"> <li>- Lead (Control of Lead at Work Regulations 1980);</li> <li>- Asbestos (Control of Asbestos at Work Regulations 1996); and</li> <li>- Compressed Air (Work in Compressed Air Regulations (NI) 2004). <ul style="list-style-type: none"> <li>- Radiation (Ionising Radiation Regulations 1985).</li> <li>- Noise (Noise At Work Regulations (NI) 1990.</li> </ul> </li> <li>- Control Of Substances Hazardous to Health (COSHH NI Regs 2003)</li> </ul>			
Corporate Services	Employee Welfare Reports	Physical files - Secure Store Electronic records - access controls	Closure of case - 6 years destroy	personal information	employees		Data held in connection with an individual's employment			
Corporate Services	Security personnel files	Physical files - Secure Store Electronic records - access controls	5 years after leaving (if at normal retirement age) or 10 years after leaving (if before normal retirement age) - destroy	security information	data subject		Data held in connection with an individual's employment			
Corporate Services	Closed Circuit Television Images (CCTV) Camera Footage	Electronic records - access controls	Destroy 31 days after image is recorded - except were required as evidence	CCTV images	images recorded by CCTV system in the vicinity of the Boards's premises		Retained in accordance with the provisions of the Data Protection Act			