



Information Charter

Types of information

Devon and Cornwall Police (DCP) and Dorset Police (DP) hold personal and non-personal information in a variety of systems and formats. This information is critical to the Forces' activities, and is further supported by information relating to the support functions of both Forces such as human resources, finance and buildings and estates.

Responsibilities

The Head of Alliance Information Management owns this charter on behalf of the Chief Constable of both DCP and DP Forces' and is responsible for the Alliance Information Management functions of Data Protection, Freedom of Information, Information Assurance and specific disclosure functions including Court Orders.

Responsibility for Records Management and Data Quality remains a force function and is led for DCP by the Head of Alliance information Management and for DP by the Head of Corporate Development.

The Senior Information Risk Owner (SIRO), as an executive board member is responsible to both Chief Constables for the Forces' risk policy, and ensuring that all information risks are managed and owned.

The Alliance Information Assurance Manager and Accreditor ensures that information assurance policies and procedures are reviewed and implemented across both Forces.

The Alliance Data Protection and Information Sharing Managers are responsible for data protection matters under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018) and the maintenance of information sharing agreements with partner organisations.

Information Asset Owners manage and monitor the information that they are responsible for, from creation to deletion / disposal.

The Records Manager for DCP and the Information Manager for DP do not work in an Alliance function and are responsible for promoting and supporting lawful and effective records management and information quality for their respective Force.

Heads of departments and line managers ensure that their staff are compliant with policies and procedures.

How our information is managed

At DCP and DP, we manage, maintain and protect all information according to legislation, policies and best practice guidelines. We have security measures in place to maintain and safeguard the confidentiality, integrity and availability of our systems and information. All information is stored, processed and communicated in a secure manner making it readily available to authorised users.

DCP and DP work in an Alliance under a Collaboration Agreement to deliver some functions both operational and non-operational. The Chief Constable of each Force remain as separate controllers for personal data recorded on the electronic and paper records under his/her control. Personal data being processed for functions that operate in an Alliance may be dealt with by DCP or DP.

DCP and DP also work in collaboration with regional Forces to deliver Procurement, a South West Forensic Service and a South West Regional Organised Crime Unit – Zephyr.

Personal data may also be shared on a case by case basis with the DCP or DP Office of the Police and Crime Commissioner (including the Commissioner, his/her staff, agents or appointed and approved volunteers) where necessary to deliver applicable statutory functions.

Privacy Notices and Individual Rights

The Privacy Notices for both Forces explain the collection and use of personal data, where personal data is obtained from, the lawful basis to process, how it is handled, how it is kept secure and to whom it is disclosed. The Rights of an Individual are also explained. The Privacy Notices are published on the Force websites (links below) or are available on request from the Data Protection Team via email here [Data Protection](#) or in writing using the address at the end of this Charter;

[Privacy notice D & C](#)

[Privacy notice Dorset](#)

The General Data Protection Regulation and the Data Protection Act 2018

General processing GDPR and Part 2 of the DPA 2018 relates to general processing and covers police support functions such as Human Resources, Occupational Health, Finance and Payroll (including pensions), Estates, ICT and Procurement. GDPR does not apply to the processing of personal data by DCP and DP (as a competent authority) for Law Enforcement purposes.

Law Enforcement processing - Part 3 of the DPA 2018 relates to the processing of personal data by a competent authority for Law Enforcement purposes - the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

Access to information

The Freedom of Information Act 2000 enables the public to have access to unpublished information that we hold, subject to certain conditions.

DCP and DP are committed to the proactive dissemination of information, to be open and transparent and will publish information, unless we are prevented from doing so by legislation. Like all public sector organisations, DCP and DP are required to make the information that it holds available, unless it is subject to an exemption.

If you wish to request information or have a query about a request, please contact the Alliance Freedom of Information Team via email using the link below or in writing using the address at the end of this Charter;

[FOI Devon and Cornwall](#)

[FOI Dorset](#)

Disclosure of information

The Freedom of Information Act 2000, GDPR and DPA 2018 have a number of exemptions which must be considered before disclosure. We will not, however, withhold information simply because it falls into a relevant exemption. We will assess the impact of disclosure of the information and make a decision on a case by case basis (except where we have decided that information of this type will be proactively shared).

Examples of proactive sharing include:

- Within the Criminal Justice System, as part of the pre-charge and post-charge processes – e.g. prosecuting someone through the court

- Working with partner agencies to reduce crime and disorder, anti-social behaviour and to safeguard children and adults
- With the Disclosure and Barring Service, to enable them to provide information to organisations to make safer recruitment decisions by identifying people who may not be suitable to work with children or other vulnerable persons
- With other professional and regulatory bodies
- With other Police Forces for statutory policing functions and the management of criminal record and biometric information

Factors we will take into account when considering whether information should be disclosed will include the following:

- The extent to which the information, or some of it, is already in the public domain
- Who is asking for the information and why they want it
- The assurance that the requestor gives on confidentiality and how reliable this assurance is deemed to be
- Whether the needs of the requester can be met by supplying part of the information or supplying it in a different form
- Whether the information is personal in nature and the extent to which its disclosure would be an intrusion on privacy
- The reasonable expectations of the person or organisation who supplied us with the information in respect of confidentiality, onward disclosure etc.
- Whether disclosing the information would be likely to prejudice our functions, for example undermining an investigation, development of policy or a potential prosecution

Additional information

You can also obtain information on:

- Agreements that we have with other organisations for sharing information
- Circumstances where we can pass on your personal data without telling you
- Our instructions to staff on how to collect, use and delete your personal data
- How we check that the information that we hold is accurate and up to date

The Data Protection Team or the Freedom of Information Team can be contacted via the email addresses above or in writing at the below address;

Devon and Cornwall Police Headquarters
Information Management Department

Elliott House
Middlemoor
Exeter
EX2 7HQ

or

Dorset Police
Force Headquarters
Winfrith
Dorchester
Dorset
DT2 8DZ

Louise Fenwick
Head of Alliance Information Management