West Midlands Police

Data Protection Impact Assessment (DPIA) – Stage 1

This form is Stage 1 of the Data Protection Impact Assessment (DPIA) process. You are advised to refer to the guidance material available before completing the form.

Data Protection Impact Assessment (DPIA)	
Please provide as much detail as possible, avoiding technical language and acronyms, explaining the proposal in a way that someone with no prior knowledge could easily understand.	
Section 1 - Governance	
Project Proposal Name:	Knife Crime - Prediction
Information Asset Owner:	
Information Custodian:	
DPIA Coordinator:	
Date on which processing will commence:	02/12/2019
Date submitted to DPO:	27/11/2019
Note: DPO will give an **initial response** within 10 working days of receiving the completed form.	
DPO Assessment	
DPO Use Only	
A. DPIA is not mandatory.	☐	
B. DPIA is not required as long as the remedial action listed is carried out. If the remedial action is not carried out, a DPIA will be required.	☐	
C. DPIA is mandatory.	☐	

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Section 2 - Purpose, Scope and Context

In this section you must explain what the processing is, who it will involve, and the intended impact. You must also demonstrate why the processing is necessary and proportionate, providing evidence to support your assessment.

- The processing must be **necessary** for the specific objective of the proposal.
- It must also be **proportionate**, meaning that the advantages resulting from the processing should not be outweighed by the disadvantages to individuals.

2.1 Please briefly explain the specific aim and purpose of the proposal in a way that someone with no prior knowledge could easily understand; avoid technical language and acronyms.

The project will aim to predict both the likely number and likely locations of knife crime over a short period of time in the future (currently envisioned as 4 weeks).

2.2 What categories of personal data will be processed? Provide an overview of the categories of personal data that will be processed, for example: names, DOBs, addresses, health data, criminal records, or any other unique identifiers such as IP addresses, usernames, e-mail addresses.

It is not currently envisioned that personal data will be processed as the unit of analysis is the crime.

2.3 Will special category data be used in the proposal? (Select all that apply)

☐ Race
☐ Ethnic origin
☐ Political opinions
☐ Sex life
☐ Religion
☐ Philosophical beliefs

☐ Trade union membership
☐ Genetic Data
☐ Biometric Data
☐ Sexual orientation
☐ Health
☑ None

This is likely to be in a collateral sense.

2.4 How will the data be collected? Briefly outline how you will obtain the data, examples include: directly from data subjects, from another data set already in the WMP's possession, from a different force.

Please refer to the General Data Analytics Lab (DAL) DPIA.

2.5 How will the data be used? Briefly describe how the data will be used, recorded, and stored and who it will be shared with.

Please refer to the General DAL DPIA.

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2.6 How many individuals will the processing affect? (Please specify one answer below)
☐ Fewer than 100 data subjects
☐ 100 to 1000 data subjects
☐ 1000 to 5000 data subjects
☒ More than 5000 data subjects

2.7 What categories of data subject are involved? (Please select all applicable categories below)
☐ Persons suspected of having committed or being about to commit a criminal offence
☐ Persons convicted of a criminal offence
☐ Persons who are or may be victims of a criminal offence
☐ Witnesses or other persons with information about offences
☐ Children or vulnerable individuals
☐ WMP staff (current and former)
☒ Other
This project examines events rather than nominals.

2.8 Will it involve the collection of new information about individuals? Will WMP collect data that it has not previously collected or had access to?
☐ Yes ☒ No

2.9 Data Sharing Does the processing involve:	Select one option
2.10.1	Data being shared with third parties external to WMP or recipients that have not previously had routine access to the information?	☐ Yes ☒ No
2.10.2	Transferring data outside the UK but within the EU?	☐ Yes ☒ No
2.10.3	Transferring data outside the EU?	☐ Yes ☒ No
2.10.4	Storing data using a cloud service provider?	☒ Yes ☐ No
2.10.5	Is there an ISA, contract, or other sharing agreement in place with all parties with whom data will be shared?	☒ Yes – agreements in place ☐ Not yet – agreements required ☐ No – none required

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2.10 Why it is necessary to use personal data to achieve the aim and why can't the aim be achieved by other means? For example, can the aim be achieved by using less data or different types of data? Are all categories of data necessary to achieve the aim?
Personal data will not be processed specifically for this project.
2.11 Explain how the use of personal data is proportionate to the aim of the proposal. Weigh the advantages of achieving your purpose against disadvantages to data subjects.
Not applicable.

Section 3 – Lawful Basis
3.1 Lawful Basis To process personal data you must have a lawful basis. Please select the one appropriate lawful basis from the drop down list.
Lawful Basis for **Operational Data** (Personal data processed for law enforcement purposes):
Necessary for a law enforcement purpose
Lawful Basis for **Administrative Data** (Personal data processed for non-law enforcement purposes, e.g. for HR or Commercial purposes):
Choose an item
3.2 Further Special Category Lawful Basis If processing special category data (section 2.3) you must have identified a further lawful condition: It is not currently envisioned that special category data will be processed specifically for this project.
Operational Data: The processing is strictly necessary (please tick to confirm) ☒ **AND** One of the following conditions applies (select from the list): Vital Interests
Administrative Data It is necessary for one of the following conditions (select from the list): Vital interests **OR** It is in the substantial public interest (tick to confirm) ☐ **AND** for the following purpose: Choose an item.
Section 4 – Review, Retention and Disposal
4.1 Does the proposal have a review, retention and disposal process that complies with WMP Policy? All records must have an initial retention period set by the owner of the information when first created or received; review and disposal criteria are defined within the WMP IM document suite.
☒ Yes ☐ No

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Section 5 – ICO: Additional Factors		
The Information Commissioner's Office have published a number of factors that present a 'high risk' when processing personal data. Saying yes to one or more of the following may indicate that the processing is high risk and a Stage 2 DPIA is likely to be required.		
Does the processing involve:	**Please check either Yes or No**	**If 'Yes' then please provide further details**
5.1	**Systematic, extensive and large scale profiling and automated decision-making about people?** *"Any systematic and extensive evaluation of personal aspects relating to natural persons which is based on automated processing, including profiling, and on which decisions are based that produce legal effects, or significantly affect the natural person"* Profiling is any form of processing where personal data is used to evaluate certain personal aspects relating to an individual, including the analysis or prediction of an individual's performance. Automated decision-making involves making a decision that affects someone by technological means without human involvement, for example issuing speeding fines solely based on evidence captured from speed cameras.	☐ Yes ☒ No	
5.2	**Large scale use of special category data or criminal offence data?** *"Processing on a large scale of special categories of data, or personal data relating to criminal convictions and offences referred to in Article 10"*	☐ Yes ☒ No	
5.3	**Public monitoring?** *"Systematic monitoring of a publicly accessible area on a large scale"*	☐ Yes ☒ No	Whilst there would not be monitoring of publicly accessible areas, the project would necessitate the analysis of crimes data that is geocoded and relates to publicly accessible areas.

5.4	**New technologies or techniques?** *"Processing involving the use of new technologies, or the novel application of existing technologies (including Artificial Intelligence)"*	☒ Yes ☐ No	Analyses such as those likely to be used for this project are relatively new to WMP (although see previous DPIAs arising from the Data Analytics Lab).
5.5	**Profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?** *"Decisions about an individual's access to a product, service, opportunity or benefit which is based to any extent on automated decision-making (including profiling) or involves the processing of special category data"*	☐ Yes ☒ No	Click here to enter text.
5.6	**Biometrics/genetic data?** *"Any processing of biometric data"* **and/or** *"any processing of genetic data other than that processed by an individual GP or health professional, for the provision of health care direct to the data subject"* Biometric data can include Facial Recognition technology, fingerprints and is defined as	☐ Yes ☒ No	Click here to enter text.
5.7	**Data matching?** *"Combining, comparing or matching personal data obtained from multiple sources"*	☐ Yes ☒ No	
5.8	**Invisible processing?** *"Processing of personal data that has not been obtained direct from the data subject in circumstances where providing a Privacy Notice would prove impossible or involve disproportionate effort"* For example, when gathering data, without the knowledge of the data subject, in the course of a Police investigation.	☐ Yes ☒ No	
5.9	**Tracking?** *"Processing which involves tracking an individual's geolocation or behaviour, including but not limited to the online environment"*	☐ Yes ☒ No	
5.10	**Targeting of children or other vulnerable individuals?**	☐ Yes ☒ No	

	"The use of the personal data of children or other vulnerable individuals for marketing purposes, profiling or other automated decision-making, or if you intend to offer online services directly to children For example, the use of personal data relating to children for the purposes of marketing their online safety products.		
5.11	**Risk of physical harm?** *"Processing is of such a nature that a personal data breach could jeopardise the [physical] health or safety of individuals".* For example, if data relating to CSAE, HUMINT or protected persons data was compromised then it could jeopardise the safety of individuals.	☐ Yes ☒ No	
5.12	**Evaluation or scoring?** *"Aspects concerning the data subject's performance at work, economic situation, health, personal preferences or interests, reliability or behaviour, location or movements"* For example, as part of a recruitment process.	☐ Yes ☒ No	
5.13	**Data processed on a large scale.** *Considerations include:* • *The number of data subjects concerned* • *Volume of data and/or range of data items* • *Duration, or permanence, of the data processing* • *Geographical extent of data processing*	☒ Yes ☐ No	The project will involve the analysis of crimes data relating to non-DV knife crime at scale.
5.14	**Preventing data subjects from exercising a right?** *The rights are:* • *The right to be informed* • *The right to access data* • *The right to rectification* • *The right to erasure* • *The right to restrict processing* • *The right to object* • *The right to portability* • *Rights relating to automated processing*	☐ Yes ☒ No	

Please forward the completed form the WMP DPO.

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