

EQUALITY IMPACT ASSESSMENT

INITIAL SCREENING

1. Name of the proposed new or changed legislation, policy, strategy, project or service being assessed

Police CyberAlarm

2. Individual officer(s) & Unit responsible for completing the Equality Impact Assessment

****S23**** National Cybercrime Programme, National Police Chiefs Council (hosted by City of London Police)

3. What is the main aim or purpose of the proposed new or changed legislation, policy, strategy, project or service and what are the intended outcomes?

Police CyberAlarm is a tool, which is currently provided free of charge, to member organisations (which may be public or private sector organisations) across England and Wales which gathers data already collected by those member organisations to identify suspicious activity data which is then filtered and transferred to policing where it can be analysed and used to provide threat intelligence, support Protect advice and used to identify targets for Prevent and Pursue activity. Data relating to individuals will primarily be collected in the form of IP addresses, and other unique identifiers which constitute personally identifiable information, but in respect of which further information shall be required in order to identify them.

The intended outcomes are:

- An enhanced intelligence picture of cyber security threats to UK organisations and UK-based threat actors;
- Increased cyber security among member organisations, and the wider UK business and public sector community;
- More disruptions of unlawful cyber activity.

4. What existing sources of information will you use to help you identify the likely equality impact on different groups of people (having regard to the protected characteristics of Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, or Sexual orientation)? *(For example statistics, survey results, complaints analysis, consultation documents, customer feedback, existing briefings submissions or business reports, comparative policies from external sources and other Government Departments)*

Since it will not be possible to identify the characteristics of the individuals to whom the collected data relates, the likely equality impact has been assessed having regard to published academic studies, in particular: Gendering cybercrime Alice Hutchings and Yi Ting Chua, published in 'Cybercrime through an Interdisciplinary Lens'; Seigfried-Spellar et al, 2015, published in Behaviour and Information Technology entitled 'Assessing the relationship between autistic traits and cyberdeviancy in a sample of college students'; and, Payne, Russell, Mills et al, 2019, published in the Journal of Autism and Developmental Disorders entitled 'Is there a relationship between cyber-dependent crime, autistic-like traits and autism?'.

US research suggests that $\frac{3}{4}$ of those involved in cybercrime are male and males are more likely to be involved in cybercrime of a technical nature, and therefore the type of activity sought to be identified using Police CyberAlarm.

Payne's research has suggested that higher levels of autistic like traits seem to be associated with greater risk of committing cyber-dependent crime, and this is supported by Seigfried-Spellar et al, but Payne also found that a (self-reported) diagnosis of autism may be associated with decreased risk of offending.

5. Are there gaps in information that make it difficult or impossible to form an opinion on how your proposals might affect different groups of people (having regard to the protected characteristics of Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, or Sexual orientation)? If so what are the gaps in the information and how and when do you plan to collect additional information? *Note this information will help you to identify potential equality stakeholders and specific issues that affect them - essential information if you are planning to consult as you can raise specific issues with particular groups as part of the consultation process. EIAs often pause at this stage while additional information is obtained.*

It will not be possible to collect information regarding the identities of all individuals whose data is collected, nor would it be desirable to do so, consistent with minimising data collected to that which is necessary and proportionate.

6. Having analysed the initial and additional sources of information including feedback from consultation, is there any evidence that the proposed changes will have a **positive impact** on any of these different groups of people and/or promote equality of opportunity? Please provide details of which benefits from the positive impacts and the evidence and analysis used to identify them.

Police CyberAlarm is intended to protect businesses and public sector organisations, rather than individuals directly.

Police CyberAlarm could have a positive impact in relation to vulnerable individuals who may engage in cyber criminality but who may be capable of being diverted away from it by being identified as a Prevent subject and being invited to participate in the scheme.

7. Is there any feedback or evidence that additional work could be done to promote equality of opportunity? If the answer is yes, please provide details of whether or not you plan to undertake this work. If not, please say why.

N/A

8. Is there any evidence that proposed changes will have **an adverse equality impact** on any of these different groups of people (having regard to the protected characteristics of Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, or Sexual orientation)? Please provide details of who the proposals affect, the adverse impacts and evidence and analysis used to identify them.

Having regard to research suggesting that those diagnosed with neuro-diversity are less likely to engage in cyber-criminality, it is not anticipated that the proposals will have an adverse equality impact on individuals with disability as a protected characteristic.

While more individuals engaged in unlawful cyber activity are likely to be investigated as a consequence, it is anticipated that more men may be subject to disruption activity, however this is not the result of any difference in treatment based on sex.



9. Is there any evidence that the proposed changes have **no equality impacts**? Please provide details of the evidence and analysis used to reach the conclusion that the proposed changes have no impact on any of these different groups of people.

10. Is a full Equality Impact Assessment Required?

No.

11. If a full EIA is not required, you are legally required to monitor and review the proposed changes after implementation to check they work as planned and to screen for unexpected equality impacts. Please provide details of how you will monitor evaluate or review your proposals and when the review will take place.

This assessment will be reviewed annually.

12. Name of Senior Manager and date approved