

Judith Jones Senior Policy Officer - Public Security, Government and Society

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
T. 01625 545804 www.ico.gov.uk

From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 01 September 2010 12:18
To: Judith Jones
Cc: Meagan Mirza; Liam Duncan
Subject: RE: Coalition commitment - local crime data

Thanks Judith – the sooner the better from our perspective. [REDACTED]

Kind regards

Rebecca

-----Original Message-----

From: Judith Jones [mailto:Judith.Jones@ico.gsi.gov.uk]
Sent: 31 August 2010 5:20 PM
To: Bradfield Rebecca
Cc: Meagan Mirza; Liam Duncan
Subject: RE: Coalition commitment - local crime data

Hi Rebecca

I may be in London on 7 September but am waiting to hear confirmation – I think it may depend on what's happening with the tube strike. [REDACTED]
[REDACTED] I'll also check with colleagues to see whether they're in London next week.

Kind regards

Judith

Judith Jones Senior Policy Officer - Government and Society,
Public Security

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 31 August 2010 15:22
To: Judith Jones
Cc: Meagan Mirza; Liam Duncan
Subject: RE: Coalition commitment - local crime data

Hi Judith

Thanks for getting back to me so quickly. It would be good to meet soon to discuss. I notice you are based in Cheshire though – do you have any plans to come down to London in the next week or so?

Kind regards

Rebecca

-----Original Message-----

From: Judith Jones [mailto:Judith.Jones@ico.gsi.gov.uk]

Sent: 31 August 2010 1:25 PM

To: Bradfield Rebecca

Cc: Meagan Mirza; Liam Duncan

Subject: RE: Coalition commitment - local crime data

Hi Rebecca

I've been passed your email because I work in the strategic liaison team that deals with public security/policing issues. We work closely with stakeholders such as ACPO, NPJA and HMCS on a range of policy issues relating to crime/policing and would be best placed to discuss these issues with you. Apologies for the delay in replying – I was on leave at the end of last week and only returned today.

As you are probably aware, our office provided advice to the Home Office and the Metropolitan Police on crime mapping back in 2008/2009 and my colleagues have continued to give advice on the subject to individual police forces. We would be happy to meet you to discuss these issues in more detail.

Kind regards

Judith

Judith Jones Senior Policy Officer - Government and
Society, Public Security

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]

Sent: 27 August 2010 15:54

To: Kussum Sharma

Subject: Coalition commitment - local crime data

Hi Kussum

I've been given your name by [REDACTED] as a good person to speak to about a piece of work I am leading on - the Government's commitment to publish crime data at a level at which the public can see what is happening on their streets. I know the ICO will have an interest in this and I am therefore really keen to engage with you as early as possible. My first question is therefore - are you the right person to speak to about this issue? If yes, my

second question is - would you be available for a meeting towards the end of next week to discuss this in more detail?

Many thanks in advance – my number is below if you wish to discuss (apologies I do not have your number).

Kind regards

Rebecca

Rebecca Bradfield

Public Confidence Unit | Home Office | **020 7035 1540**

6th Floor, Fry Building, 2 Marsham Street, London SW1P 4DF

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 10 September 2010 11:28
To: Meagan Mirza
Cc: Judith Jones; Jonathan Bamford; Liam Duncan
Subject: RE: Crime mapping

Hi Meagan

Thanks for sending through your thoughts. I'll give you a call on Monday to discuss in more detail. Would a conversation at 2ish work for you?

Kind regards (and have a good weekend!)

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]
Sent: 10 September 2010 9:52 AM
To: Bradfield Rebecca
Cc: Judith Jones; Jonathan Bamford; Liam Duncan
Subject: Crime mapping

Rebecca

We agreed that I would expand on some of the concerns which I mentioned when we met on Monday but if there is anything further you need please contact me. Apologies for the delay getting this to you.

The main data protection concern with 'point data mapping' is the risk of identifying individuals (innocent victims, witnesses or vulnerable offenders) or indeed the risk of disclosure of sensitive personal information about those individuals if they have been the victim of a racially motivated crime for example. It is feasible that indicating on a street the location of a crime (sensitive or otherwise) could identify the individual or the family concerned.

As we also discussed, due to the way postcodes are allocated it can be the case that a postcode will relate to a single building (or residence) or indeed a school. Consideration will therefore need to be given to postcodes which relate to a few homes being removed or combined with a neighbouring postcode which contains more houses to minimise the risk of identifying individuals. I understand that 'brick' arrangements have been developed in respect of medical research which minimise the risks of individuals being identified and it may be worth considering these although I appreciate you are working to a tight timescale with this. We understand that some police forces such as the MPS have limited

reporting on crimes such as theft/burglary of motor vehicle crimes to lower super output areas which contain a minimum of 400 dwellings (approximately 3 streets).

I understand that you are still considering the type of crimes that will be flagged (or pin pointed). We discussed those crimes such as sexual offences or domestic violence which require a higher threshold to safeguard the personal privacy of victims and any witnesses. I understand that Hampshire have combined potentially sensitive offences together to ensure minimised risk of identification.

Lastly, you will need to consider the time scale for the display of information as, for example, data covering one month for some sensitive crimes could indeed also lead to identification particularly if there has only been a small number of a particular type of crime in an area or on a street for example.

As I mentioned, the ICO wouldn't be able to endorse any particular model however we could comment more generally if we considered that there appeared to be appropriate safeguards in place to minimise the risk of identification of individuals. We would however need to consider any complaints that we may receive from individuals who may be affected by the disclosure of this information.

If you do need anything further please contact me.

Regards
Meagan

Meagan Mirza Group Manager - Public Security Group

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 21 September 2010 19:10
To: Meagan Mirza
Cc: Jonathan Bamford; Liam Duncan; Judith Jones; [REDACTED]
Subject: RE: Crime mapping

Hi Meagan

Apologies for the delay in responding to this e-mail – it has been a busy couple of weeks. Many thanks for providing such a prompt view on our emerging proposal. Advice is now with Ministers for consideration.

[REDACTED] As it is conference recess at the moment, it is quite likely that we will not hear back from Ministers before I return. I'll ask [REDACTED] to update you if anything happens [REDACTED]

Kind regards

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]
Sent: 15 September 2010 9:25 AM
To: Bradfield Rebecca
Cc: Jaspert Gus; [REDACTED] Jonathar Bamford; Liam Duncan; Judith Jones
Subject: RE: Crime mapping

Rebecca

Thank you for providing the further detail which is helpful to understand how it will work in practice. It is reassuring to see that the offences are being combined to minimise the risk of individuals being identified particularly those individuals who are the victims of or who witness those sensitive crimes such sexual offences/domestic violence/race related crime. It isn't clear which category the potentially sensitive offences would come under but I am assuming that it would be under 'violence'?

You have explained that the data will be provided by forces once a month. I note that this may become more frequent and that you would discuss any proposed changes with us and we welcome this. On the point of data being uploaded monthly, I would just reiterate the concern I raised previously in that if for example one rape was reported in one month in a particular area then it may be that having only reported that month's data will increase the potential of identifying the individual involved and consideration will need to be given to minimising the risk of identification in those or similar circumstances.

We are reassured that data will be published in a way that ensures the

I hope this helps but please let me know if you need any further information.

Meagan Mirza Group Manager - Public Security Group

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Meagan

What data?

- Vehicle crime (which includes theft from a vehicle, and theft of a vehicle, but excludes interfering with a motor vehicle)
- Violence (which includes all categories of violence against the person but does not include possession of firearms offences)
- All Crimes (reported under a single category)
- ASB (includes the number of reports of anti-social behaviour that are made to the police, and where possible, to other partners. ASB in this context means all incidents of ASB as defined within the National Standard for Incident Recording).

These are the same categories as currently used on the national Crime Mapping website.

How often?

You have explained the need to consider the time scale for the display of information. The current proposal is for forces to provide this data once a month. We may work with forces to increase the frequency of this data in the future but we recognise the need to discuss any proposed changes with you.

How presented?

You have been clear that the ICO's primary concern with 'point data mapping' is the risk of identifying individuals (innocent victims, witnesses or vulnerable offenders) and have suggested that thought should be given to removing postcodes which relate to a few homes or combining them with a neighbouring postcode which contains more houses to minimise the risk of identifying individuals. As explained previously, Minister's fully agree with the need to safeguard the identity of individuals.

We are therefore proposing to release only anonymised crime data into the public domain. Data will be published in such a way that ensures the location of a crime can not be narrowed down to fewer than eight properties. This will be achieved by either:

Option A) Approximating crime location to the centre point of the postcode centroid that a crime took place in (e.g SG17 5BA). If this postcode contains less than 8 properties, it will be combined with the nearest postcode area containing eight properties or more.

Option B) Approximating crime location to the nearest street containing 8 or more properties.

For both options, if a crime takes place in a location such as a park, forest or between motorway junctions it will be assigned to the centre point of that landmark.

As discussed earlier, this is an emerging solution that has not yet been discussed with Ministers. I'd therefore appreciate it if you could keep any further circulation of this e-mail within the ICO. I'd be really grateful for your thoughts on the above. As always, I'd be very happy to discuss anything with you if helpful.

Kind regards

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]

Sent: 10 September 2010 9:52 AM

To: Bradfield Rebecca

Cc: Judith Jones; Jonathan Bamford; Liam Duncan

Subject: Crime mapping

Rebecca

We agreed that I would expand on some of the concerns which I mentioned when we met on Monday but if there is anything further you need please contact me. Apologies for the delay getting this to you.

The main data protection concern with 'point data mapping' is the risk of identifying individuals (innocent victims, witnesses or vulnerable offenders) or indeed the risk of disclosure of sensitive personal information about those individuals if they have been the victim of a racially motivated crime for example. It is feasible that indicating on a street the location of a crime (sensitive or otherwise) could identify the individual or the family concerned.

As we also discussed, due to the way postcodes are allocated it can be the case that a postcode will relate to a single building (or residence) or indeed a school. Consideration will therefore need to be given to postcodes which relate to a few homes being removed or combined with a neighbouring postcode which contains more houses to minimise the risk of identifying individuals. I understand that 'brick' arrangements have been developed in respect of medical research which minimise the risks of individuals being identified and it may be worth considering these although I appreciate you are working to a tight timescale with this. We understand that some police forces such as the MPS have limited reporting on crimes such as theft/burglary of motor vehicle crimes to lower super output areas which contain a minimum of 400 dwellings (approximately 3 streets).

I understand that you are still considering the type of crimes that will be flagged (or pin pointed). We discussed those crimes such as sexual offences or domestic violence which require a higher threshold to safeguard the personal privacy of victims and any witnesses. I understand that Hampshire have combined potentially sensitive offences together to ensure minimised risk of identification.

Lastly, you will need to consider the time scale for the display of information as, for example, data covering one month for some sensitive crimes could indeed also lead to identification particularly if there has only been a small number of a particular type of crime in an area or on a street for example.

As I mentioned, the ICO wouldn't be able to endorse any particular model however we could comment more generally if we considered that there appeared to be appropriate safeguards in place to minimise the risk of identification of individuals. We would however need to consider any complaints that we may receive from individuals who may be affected by the disclosure of this information.

If you do need anything further please contact me.

Regards
Meagan

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 14 October 2010 09:40
To: Meagan Mirza
Subject: Emails with Rebecca Bradfield Home Office re Clir's enquiries 20101014

Thanks Meagan – much appreciated. For info, the latest information that the NPIA has given forces is copied below - you can see it is still intentionally high level and flags our ongoing work with you. I'll give you a call if I can shed any more light on all of this....

Rebecca

Privacy & Anonymisation

It is clear that the data uploaded by forces must be anonymised before publication. It is proposed that this anonymisation will be completed centrally by the CrimeMapper system in order to minimise the burden of work on forces.

The exact method for anonymising the data is still under consideration by the Crime Mapping Strategic Steering Group (CM SSG). This group includes representatives from the Information Commissioner's Office, ACPO Freedom of Information, and police forces.

The likely method will involve approximating incident location to the centre point of the nearest large street or road (where 'large street' is defined as one that contains over x properties, with x still to be defined).

Please be assured that comments from forces in response to the Technical Evaluation, along with feedback from the upcoming Crime Mapping workshop and consultation with frontline officers will influence this decision.

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]
Sent: 14 October 2010 9:37 AM
To: Bradfield Rebecca
Subject: FW: point data mapping

Rebecca

As discussed, please find my email to Liam Maxwell below.
 Meagan

Meagan Mirza Group Manager - Public Security Group

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From: Meagan Mirza
Sent: 13 October 2010 16:14
To: 'cllr.maxwell@rbwm.gov.uk'
Cc: Judith Jones
Subject: point data mapping

Liam

As discussed, please find below the ICO's view on point data mapping. This formed part of our response to the recent policing consultation and is also that which was reflected in what I've outlined to the Home Office.

"We also support the drive to provide greater transparency on criminal activity in local areas. The consultation document includes a commitment that, from January 2011, crime data will be published at a level which allows the public to see what is happening on their streets and neighbourhoods. Crime mapping can be an effective means of letting people know what crimes are taking place in their local area and we have advised the Home Office and local forces on how such systems can be designed to take account of privacy risks - particularly when 'point data mapping' risks identifying individuals (especially innocent victims, witnesses or vulnerable offenders) or risks disclosure of sensitive personal information about those individuals if, for example, they have been the victim of a racially motivated crime or a sexual assault. We encourage the use of privacy friendly options that reduce the risks of identifying such individuals such as by merging adjoining postcodes in sparsely populated areas and banding together certain categories of crime. The ICO would be concerned if privacy risks arising from aggregation with other datasets in the public domain were not taken fully into account.

We recognise that there are demands from some quarters for even greater openness, with some people arguing for full disclosure of crime details as soon as possible after the event but it is important that privacy risks are managed carefully, especially as once this information is published on the internet, it is no longer possible to control what happens to it."

So far as engaging with us, we would be happy to meet with you to discuss this in more detail if you wish.

Regards

Meagan

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From: Meagan Mirza
Sent: 04 November 2010 14:47
To: 'Bradfield Rebecca'
Cc: Judith Jones
Subject: ICO advice to HO on PIAs 20101104

Rebecca

It was good to speak with you yesterday and, as discussed, I am sending you some information in relation to Privacy Impact Assessments (PIAs). Central government departments have been instructed to complete PIAs by the Cabinet Office on any new initiatives involving personal information. It is a practical tool to help organisations and policy developers identify and address the data protection and privacy concerns at the development stage of a project, and build data protection compliance in from the outset.

You will see from the Overview document that PIAs are most effective when they are started when you know what you want to do and how you want to do it. Given that you are now at this stage of the project you will need to consider undertaking a PIA.
http://www.ico.gov.uk/upload/documents/library/data_protection/practical_application/privacy_impact_assessment/overview.pdf

I've also included a link to the PIA handbook which provides a detailed explanation on how to undertake a PIA.
http://www.ico.gov.uk/upload/documents/pia_handbook.html_v2/index.html

I look forward to hearing from you with confirmation of the proposals.

Speak to you soon.

Regards
Meagan

Meagan Mirza Group Manager – Public Security Group

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From: Meagan Mirza
Sent: 15 November 2010 10:41
To: 'Bradfield Rebecca'
Cc: Judith Jones; Jaspert Gus; [REDACTED]
Subject: RE: Crime Mapping Advice

Rebecca

Thanks for providing comments on our Advice. Unfortunately we're not going to be able to consider this now until tomorrow morning so apologies for the delay this will cause. I'll contact you following that meeting.

Thank you for the offer of meeting with yourself and Gus to discuss if required – I don't think we'll need to as your comments are clear but I'll speak to you tomorrow after we've discussed the comments with our policy team.

Regards
Meagan

Meagan Mirza Group Manager – Public Security Group

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From: Bradfield Rebecca [<mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk>]
Sent: 12 November 2010 17:51
To: Meagan Mirza
Cc: Judith Jones; Jaspert Gus; [REDACTED]
Subject: RE: Crime Mapping Advice

Hi Meagan

Following our conversation on Thursday, please find below the key comments / issues from my perspective. I've tracked some changes in the document which reflect the points below which I hope you will also find helpful.

- The document talks mainly about crime mapping and not much about crime data. As discussed previously, the data used to create the maps will be available for reuse after having gone through the sanitisation / filtering process. It would help to make clear that this advice applies to the data as well as the maps – I think this is partly dealt with in the 'secondary uses of crime maps' section but I've tracked a minor change just to clarify.
- The guidance uses 'pinpointing', 'pinpoints' or 'pins' to refer both to the practice of publishing exact household level pins (which we are not proposing to do), and the practice of display information as 'dots' throughout the document. I am worried that this will confuse forces a lot so it's really important that we clarify – I've attempted to do this in the document – see what you think.

- The above clarification is particularly important for the 'indicating crime scenes and levels' section. Based on your earlier advice (see attached) I think the point that you are making is that the ICO will not endorse / support dots on houses but that higher level dots / indicators could be ok depending on the other safeguards that are in place and the provision of clear information to the public about what the data / maps cover so it is not misleading. I've tried to rework on this basis but again see what you think and very happy to discuss. This section feels most significant to me.
- In the fifth bullet of the summary box, I think the point that you are making is that just because we are imposing a filter on the number of properties, doesn't mean that we have covered off all privacy issues – there are multiple other variables to consider i.e. timing, crime types etc. I got slightly confused when reading through so have redrafted slightly.

I hope this is helpful. Thanks again for early sight of the guidance. As you know, this advice is central to delivery of the PM's commitment so I am really grateful for the opportunity to feedback. I'd very much welcome a conversation with you on these points after you have discussed with your policy team on Monday. Gus and I would be very happy to attend a meeting too if you feel that would help at any point.

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]
Sent: 11 November 2010 1:35 PM
To: Bradfield Rebecca
Cc: Judith Jones; Jaspert Gus; [REDACTED]
Subject: RE: Crime Mapping Advice

Hi Rebecca

We're happy to hold off circulating until then. [REDACTED]
 so feel free to give me a call anytime before then otherwise I'll give you a call tomorrow morning.
 Meagan

Meagan Mirza Group Manager – Public Security Group

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 11 November 2010 10:58
To: Meagan Mirza
Cc: Judith Jones; Jaspert Gus; [REDACTED]
Subject: RE: Crime Mapping Advice

Hi Meagan

I massively appreciate such a prompt turnaround and early sight of this and would definitely welcome a conversation later today. I wanted to ask though whether you would be happy for this to go on a restricted circulation to the Strategic Group first (before going to ACPO and Liam Maxwell etc.) so it can be used to inform the final proposal for January which is to be agreed by the Group on the 18th and communicated immediately after to forces?

Whilst we have informed ACPO and forces of our proposed high level approach to this work we have been clear that this will be subject to discussions with yourself and testing over the next couple of months. The sequencing of this therefore feels crucial to me and it would greatly help if we were able to write out to forces at the end of next week with our final proposal (in the light of your emerging advice), highlighting that you are issuing revised advice to the service, which can then follow straight after (so by the end of next week). Would that be possible?

Kind regards

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]

Sent: 11 November 2010 10:06 AM

To: Bradfield Rebecca

Cc: Judith Jones

Subject: Crime Mapping Advice

Importance: High

Rebecca

Please find attached our advice on Crime Mapping. I'm sharing this with you initially but am planning to circulate it more widely tomorrow ie with the Steering Group and with ACPO (and with Cllr Maxwell) and we are planning to place it on our website next week. It is very general advice and doesn't reflect the specifics of the current proposals but I wanted to share this with you first. I'm in the office for most of the day today and tomorrow so please ring me if you want to discuss.

Regards

Meagan

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From: Meagan Mirza
Sent: 16 November 2010 11:13
To: 'Bradfield Rebecca'
Cc: Judith Jones; Jaspert Gus
Subject: Crime Mapping Advice
Importance: High

Rebecca

I've just called you to let you know that we have incorporated all your suggested changes and included a couple of additional paragraphs to reflect the points made in your email – these are 'Explaining Crime Map Data' and 'Crime Statistics'. The amended version is attached.

Can you give me a call once you've had a chance to consider this so we can discuss circulation with the steering group etc. We are holding off on wider circulation until middle of next week so that the Steering Group have a chance to consider this first. [REDACTED]

Regards
Meagan

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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]

Sent: 02 December 2010 17:34

To: Judith Jones

Cc: Meagan Mirza

Subject: Issues with opening crime mapping guidance

Hi Judith

I've just spoken to your colleague Jill about an issue that some people are apparently having when trying to access the recently updated crime mapping guidance. I've somehow managed to lose her e-mail address – please could pass on the e-mail below?

Thanks

Rebecca

Jill

Thanks for your help with this - the comment that I have received is as follows

I can open this if I click onto the link in the email - however I tweeted the linkURL for developer feedback and they can't open it - on the ICO site when I try and click it I can't open it as the file ends with .ashx

Would it be possible to reformat asap so that all can access?

Many thanks

Rebecca

Rebecca Bradfield

Local Policing, Crime and Justice Unit | Home Office | **020 7035 1540**
6th Floor, Fry Building, 2 Marsham Street, London SW1P 4DF

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From: Judith Jones
Sent: 13 January 2011 10:18
To: 'Bradfield Rebecca'; Meagan Mirza
Cc: Jonathan Bamford; Steve Wood; Robert Parker
Subject: Crime mapping - ICO quote for launch - 20110113

Rebecca

Here's our quote for your comms team's press pack:

- The Information Commissioner welcomes the drive to improve accountability through greater transparency. Crime mapping can be an effective means of letting people know what crimes are taking place in their local area although care needs to be taken as this can potentially have an impact on the privacy of individuals such as victims or witnesses. We are pleased to have had the opportunity to provide advice about the privacy implications of the CrimeMapper project and that our advice has been incorporated into many of the safeguards that have been put in place. It will be important that this initiative is reviewed to ensure that the privacy safeguards are effective in practice.

I'll wait for you to get back to us with a comms contact and any news on likely prominence the ICO quote will be given, so that our comms team can prepare accordingly.

Many thanks

Judith

Judith Jones Senior Policy Officer - Public Security, Government and Society

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From: Bradfield Rebecca [<mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk>]
Sent: 13 January 2011 09:13
To: Meagan Mirza
Cc: Judith Jones
Subject: RE: Update

Thanks – I've sent on the invite for the meeting. I've got a meeting with my comms team this morning so will get a nominated contact to you later on today. Still uncertain about the likely prominence of the launch but will Judith posted as plans develop (will also send on requested documents once finalised).

Big thanks as always to you both for your ongoing help and support. [REDACTED]

Rebecca

-----Original Message-----

From: Meagan Mirza [<mailto:Meagan.Mirza@ico.gsi.gov.uk>]
Sent: 13 January 2011 8:00 AM
To: Bradfield Rebecca
Cc: Judith Jones

Subject: Update

Rebecca

This is a quick email before I go off on leave - We are in the process of finalising the quote for you and Judith will forward that to you today. Could you let Judith know what prominence will be given to this so that we can be prepared for any enquiries we may receive. It would also be helpful if we could see the FAQs that will form part of the comms pack as well.

Our comms team would like to link in with your comms people so would you be able to provide Judith with details of who our Comms Planning Manager, Robert Parker, can contact.

Could you send the PIA to both Judith and I once it is finalised. It would also be useful if we could see the data processing agreement.

Lastly, Judith is going to join me in London for the meeting with you so would you be able to send a separate invite to her. Judith has been very much involved with this work and we'll be both working on this going forward.

I haven't as yet received anything from Cllr Maxwell. Judith is my out of office contact while I'm off so, if we do receive anything, I'll mention that she can contact you if she wants to discuss it.



Meagan

Meagan Mirza Group Manager – Public Security Group

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.
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From: Bradfield Rebecca [mailto:Rebecca.Bradfield@homeoffice.gsi.gov.uk]
Sent: 29 January 2011 13:24
To: Meagan Mirza
Cc: Judith Jones; Jaspert Gus; [REDACTED]
Subject: Email from Home Office confirming launch plans 20112901

Hi Meagan and Judith

Sorry for the silence – pretty frantic indeed! Thanks for sight of the note below – I'm looking forward to having a proper catch up on everything when we meet next week. [REDACTED]

The plan is for an embargoed release of info to the media on Monday with public launch on Tuesday. Obviously not for wider but important that you and your Press Office are sighted as we have included your statement in the Press Notice (many thanks – really helpful). I assume our respective Press Offices have been talking but you might just want to check this on Monday morning.

Come back to me with any questions on Monday – I will be out and about so speak to [REDACTED]
[REDACTED]

Many thanks

Rebecca

-----Original Message-----

From: Meagan Mirza [mailto:Meagan.Mirza@ico.gsi.gov.uk]
Sent: 27 January 2011 2:59 PM
To: Bradfield Rebecca
Cc: Judith Jones
Subject: Advice to Cllr Maxwell

Rebecca

I gather you must be frantic at the moment. Is there any news on a launch date? Also, could you send a copy of the PIA when you can.

For information please find below the advice we've given to Cllr Maxwell in relation to the proposals for the vanguards. We can expand on this when we meet next week but I wanted to keep you in the loop with this.

Let me know if you need anything else and Judith and I look forward to seeing you next week.

Regards
Meagan

Liam

Thanks for sharing your proposals and 'guidance' document with us. As we've said previously we very much welcome the drive to improve accountability through greater transparency and the release of crime data can be an effective means of letting people know what crimes are taking place in their local area. However, as you know, care needs to be taken as this can potentially have an impact on the privacy of individuals such

as victims or witnesses and in turn engages concerns about compliance with the Data Protection Act and Human Rights Act.

As we discussed in our meeting, this is a fairly new area and technological advances have meant that it is developing rapidly and the impact that the release of crime data may have on an individual's privacy has not been properly explored as yet. It is therefore difficult to give specific scenarios for each type of crime that may impact on an individual's privacy. Also, we are not experts on the potential implications of this on victims and it may well be that consultations with victims groups may assist. Further, it is not yet apparent how this type of data could be exploited and indeed what the public perception is or will be once it is seen how the information can be used. You may wish to consider undertaking a Privacy Impact Assessment given that this is a new developing area and I can provide further information in relation to that if you wish.

We agreed that it makes sense for different crimes to be treated differently and our starting point is that we consider the high risk areas (risk of identification of individuals) to be those crimes which occur at places owned or occupied by individuals. The Data Protection Act will come into play when there is a likelihood that an individual can be identified and this will mean that you will be required to comply with this legislation when processing personal data.

You have indicated that the privacy tariff for public place anti-social behaviour is low and we would agree with that and the frequency of data upload in this respect would also be low risk. However, consideration will need to be given to the privacy tariff for vehicle crime and criminal damage which is described as 'low'. That may be the case where, for example, the vehicle crime or criminal damage has occurred in a public space ie a car park but would be different for those occurring at an individual's home. We would suggest that there should be a filter to distinguish residential as opposed to non-residential and our view would be that criminal damage occurring at a residence should revert to snap points. Also, the rationale for the frequency of upload for this will need to be considered as that is currently 'daily'. An example which may support our concerns here would be where individuals working in animal research have had their homes targeted resulting in criminal damage to their property. This, in your proposal, would appear on the day it occurred and the exact location thereby putting that individual at risk of identification and of further attacks.

It would also be helpful to clarify what the 'violence' category covers – it says 'violent crime up to GBH' but it is not clear whether that covers sexual offences, rape, grooming etc. You have said that 'the vanguards will .. not include those that include a very high privacy tariff – domestic abuse and so on' and it would be helpful if you could clarify the extent of these other matters beyond domestic abuse. Also, it is not clear whether there will be a facility available for individuals to request that data be removed if there is a concern raised. This has been incorporated into the national Crime Mapper site and you may want to consider this.

It is not clear whether the crime number/URN is going to be displayed at this stage. We will be exploring this in more detail with the Home Office in relation to the national Crime Mapper site but our initial concern would be

that this would potentially lead to victims being identified. This is because the crime number may have greater currency than just within the criminal justice system as this is commonly provided to insurance companies when processing claims. Until we know more detail on how this will work in practice it is difficult for us to provide a view at this time.

It was also not clear what the status of the guidance is and the role it is meant to play – I think you had mentioned that it had been drafted for the purposes of the vanguards by yourself and Professor Shadbolt and we do have some general comments on that in particular that it combines practical 'best practice' advice in relation to legal duties with a commentary about the value of crime mapping. This is potentially confusing. Neither the Data Protection Act or the Human Rights Act is mentioned in relation to legal duties and that should be incorporated as, as mentioned above, where there is a likelihood that an individual could be identified it will be personal data. It is not clear whether the guidance has been approved by the relevant Police Authority or who it is aimed to and perhaps you could clarify that.

Our consideration of your proposals is based on the fact that we are looking at risks of non-compliance with the Data Protection Act. As mentioned above, we do appreciate this is a rapidly developing area and we have tried to deal with this pragmatically. You will have seen the guidance we provided in response to the proposals for the national Crime Mapper site and we will consider revising that if required. However, as a regulator, we would also need to consider any complaints that we may receive from individual/s affected by the disclosure of this data.

Meagan Mirza

Group Manager – Public Security Group

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