



## FREEDOM OF INFORMATION REQUEST



**Request Number:** F-2018-01401

**Keyword:** Organisational Information/Governance

**Subject:** Information Security

### Request and Answer:

Your request for information has now been considered. In respect of Section 1(1)(a) of the Act I can confirm that the Police Service of Northern Ireland does hold information to which your request relates and the decision has been taken to disclose the following.

#### Request 1

I would like to know your information policies and standards that you follow in relation to safeguarding of my personal data, such as whether you adhere to ISO27001 for information security.

#### Answer

The Information Security Branch within the PSNI has a mature Information Governance regime in place which includes procedural, personnel and technical controls. We adhere to Her Majesty's Government (HMG) Security Policy Framework, produced by The Cabinet Office. This analogous to ISO27001, describing the standards, best practice guidelines and approaches that are required to protect UK government assets. PSNI also adheres to the Home Office's National Police Information Risk Management Team 'Governance and Information Risk Return' (GIRR) which sets out requirements specifically for UK policing.

#### Request 2

Please also advise whether you have in place any technology which allows you with reasonable certainty to know whether or not my personal data has been disclosed, including but not limiting the following:

- i. Intrusion detection systems;
- ii. Firewall technologies;
- iii, Access and identity management technologies;
- iv. Database audit and/or security tools; or,
- v. Behavioural analysis tools, log analysis tools, or audit tools;

#### Answer

PSNI's Information Security Branch can confirm that we have technologies in place to protect police data, including personal data, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

### **Request 3**

In regards to employees and contractors, please advise as to the following:

- a. What technologies or business procedures do you have to ensure that individuals within your organisation will be monitored to ensure they do not deliberately or inadvertently disclose personal data outside your organisation, through e-mail, web-mail or instant messaging, or otherwise.
- b. Have you had any circumstances in which employees or contractors have been dismissed and /or been charged under criminal laws for accessing my personal data inappropriately, or are unable to determine this, of any customers, in the past twelve months.
- c. Please advise as to what training and awareness measures you have taken in order to ensure employees and contractors are accessing and processing my personal data in conformity with General Data Protection Regulation.

### **Answer**

**a.** PSNI have an Information Security Service Instruction which defines the Information Security and Data Protection responsibilities of the PSNI to ensure we met mandatory Information Assurance standards and data protection obligations in with HMG Security Policy Framework, the Association of National Police Chiefs' Council and Information Systems Community Security Policy. Underpinning these are Information Security standards which provide specific detail on Information Security controls, countermeasures and practices which must be adhered to in order to provide the assurance that information is protected and that information systems are operated and secured in a consistent and adequate manner. These include email usage standards, removable media standards, internet usage and acceptable use standards. All PSNI officers and staff are made aware of the Service Instruction and procedures that exist and the disciplinary proceedings which could result from non-compliance. All PSNI officers and staff are required to complete mandatory data protection and information security training.

**b.** The Professional Standards Department has confirmed that during the past 12 months there have been no cases where officers have been dismissed for accessing any personal data unlawfully. There have been a total of 5 cases where officers have faced criminal charges for unlawfully accessing personal data. This does not include cases where criminal investigation may still be ongoing, or where PPS have directed no prosecution.

Human Resources (HR) have stated during the past 12 months there have been no cases where PSNI staff or contractors have been dismissed for accessing any personal data unlawfully. Records held by HR do not record any instances of police staff having been dismissed within the parameters outlined in the above question.

**c.** PSNI initiated a project in anticipation of the General Data Protection Regulation. The project team considered all actions required across the organisation to ensure compliance with GDPR, including training. GDPR specific training and awareness information has been provided to all staff and contractors. In addition, all officers and staff must complete mandatory E-learning courses which cover Data Protection, Information Security and Government Security Classification policy. Line Managers and employees are directly responsible for ensuring that mandatory training is completed based on the role the employee holds.

If you have any queries regarding your request or the decision please do not hesitate to contact me on 028 9070 0164. When contacting the Freedom of Information Team, please quote the reference number listed at the beginning of this letter.

If you are dissatisfied in any way with the handling of your request, you have the right to request a review. You should do this as soon as possible or in any case within two months of the date of issue

of this letter. In the event that you require a review to be undertaken, you can do so by writing to the Head of Freedom of Information, PSNI Headquarters, 65 Knock Road, Belfast, BT5 6LE or by emailing [foi@psni.pnn.police.uk](mailto:foi@psni.pnn.police.uk).

If following an internal review, carried out by an independent decision maker, you were to remain dissatisfied in any way with the handling of the request you may make a complaint, under Section 50 of the Freedom of Information Act, to the Information Commissioner's Office and ask that they investigate whether the PSNI has complied with the terms of the Freedom of Information Act. You can write to the Information Commissioner at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. In most circumstances the Information Commissioner will not investigate a complaint unless an internal review procedure has been carried out, however the Commissioner has the option to investigate the matter at his discretion.

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

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