



Privacy Notice: Surrey Police and Sussex Police

Joint Force Vetting Unit

Surrey Data Protection Officer: Kelly Thornton
dataprotection@surrey.police.uk
[Full Privacy Notice](#)

Sussex Data Protection Officer: Jim Collen
DPO@sussex.police.uk
[Full Privacy Notice](#)

Vetting Unit Address:

Surrey and Sussex Joint Force Vetting Unit
Professional Standards Department
Sussex Police Headquarters
Malling House,
Church Lane
Lewes
East Sussex
BN7 2DZ

The use and disclosure of your personal information is governed in the United Kingdom by UK Data Protection Legislation. The Data Protection Act 2018 require organisations to process data in a fair, lawful and transparent manner. It mandates that certain information must be communicated to data subjects to ensure that they are as well informed as possible about how their data will be processed.

Our Privacy Notice tells you how Surrey Police and Sussex Police hold, retain, process, disclose and share the information we obtain about you. It also explains the rights you have regarding your personal information.

The Chief Constables for Surrey Police and Sussex Police are defined as the 'Data Controllers' for the purposes of the legislation and are required to ensure Surrey Police and Sussex Police handles all personal information in accordance with that legislation.

Surrey Police and Sussex Police takes that responsibility very seriously and takes great care to ensure your personal data is processed appropriately to maintain your trust and confidence in the police.

What is Vetting and Why Do We Collect Information?

Vetting is a risk management process. It is used to assess any potential risk posed to a police force or wider service and, where appropriate, assist in the identification of proportionate and realistic risk mitigation measures. *The police carry out searches using the Police National Database (PND) to establish if there are any allegations, investigations or ongoing proceedings within other Force areas. This process applies to Police officers, Police Community Support Officers (PCSOs), Special Constables, police staff, temporary, voluntary and agency staff. The review process will be conducted throughout an individual's employment in the Police and any identified concerns will be fully reviewed by a member of the Force Vetting Unit and will not be subject to automated decision making processes.*



Lawful Basis for Vetting

The lawful basis for vetting is contained in the College of Policing Vetting Code of Practice and the Police Act 1996. The below outlines the specific lawful basis under the UK GDPR and Part 3 of the Data Protection Act 2018.

Personal Data (Article 6 (1) of the UK GDPR):

- (b) **Contract:** processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (e) **Public task:** processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Special Category Data (Article 9 (2) of the UK GDPR):

- (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Lawful basis for processing sensitive data for law enforcement purposes:

- Police will process Personal / Sensitive Data under its statutory functions and where processing is necessary for the performance of a task carried out for that purpose by a competent authority. The definition of statutory function for 'law enforcement purposes' is 'purposes of 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. The police will process Sensitive data where the processing is strictly necessary for the law enforcement purpose and the processing meets at least one of the conditions in Schedule 8, Part 3 DPA 2018 namely;
 - Judicial and statutory purposes/administration of justice
 - Safeguarding of children and of individuals at risk

What Information Is Collected?

Depending on the level of clearance required, we will collect the following information:

- As a minimum, we will collect your personal information i.e. name, home address (including previous address where necessary), date of birth and national insurance number
- For higher levels of clearance, we will also collect information in relation to your family members (including your partner) and potentially, your associates.
- We may also collect information in relation to your social media profiles and financial situation.

Vetting at the correct level can enable the individual being issued with an Identity and Access Management (IAM) cards, which are used to provide physical access to police premises. Details of the use of the cards to enter and exit police buildings will be recorded. IAM cards are issued to all police officers and members of police staff and may be issued to partnership worker, contractors and other third party personnel.

Do I have to provide the Information?

Whilst you can decline to provide some or all of the information required in the vetting forms, it will not be possible to conduct a meaningful risk assessment and clearance cannot be granted.



Special Category Data

As part of the vetting process, we process special (UK GDPR) and sensitive (Data Protection Act 2018) categories of personal data such as information about your:

- Race;
- Ethnic origin
- Religion;
- Biometric data;
- Political opinion;
- Sexual orientation

Protected Characteristics

The vetting form requires the disclosure of sensitive data, including data relating to protected characteristics.

There is not statutory protection for individuals who fail to disclose this information, where it is legitimately required.

Should you wish to have a confidential conversation about how this information, or any personal information is handled and the protection it is afforded, please contact the Joint Force Vetting Unit on **01273-404476** or force.vetting@sussex.police.uk

How Is The Information Stored and For How Long?

The information you provide is stored electronically in a secure database. Access to this database is strictly restricted to those with an operational 'need to know'.

The information is stored in accordance with the Surrey Police and Sussex Police Retention Schedule.

How Is The Information Processed?

The information you provide will be checked against Police databases and information systems. Where applicable, it will also be checked against 'open source' internet, the records of Credit Reference Agencies and other third party records.

Where Credit Reference Agency records are checked, this will be for the vetting subject only and not for any other individuals named on the form.

Any information which is revealed as a result of the vetting process is reviewed by a vetting practitioner. There is no automated decision making process.

Is The Information Shared With Anyone?

Where you are applying to be appointed to or employed by either Surrey Police or Sussex Police, your personal information may be shared with the Human Resources Department for the purposes of adding you to the HR system. The personal information of any other individuals named on the form will not be provided to HR.

The above also applies to any external personnel who require unsupervised access to force premises, information, systems or other assets.

Personal information provided on the vetting form may, where necessary and proportionate, be shared with other departments of the force, other police forces or external agencies. This will be considered on a case by case basis and be limited to only the information, which is necessary, in accordance with the relevant legislation.

Information provided within the vetting form is not transferred overseas.



Surrey & Sussex

Policing Together

Professional Standards Department (PSD) will continually monitor Police records (including recruitment, People Services and Operational Policing records) throughout your employment in both Forces. This is to ensure the integrity and security of its workforce. This will include Domestic Abuse and other reported criminal activity involving serving officers and / or members of staff.

It is necessary and reasonable for the Police to identify these reports and address the safeguarding of serving officers and / or members of staff in order to manage the risk posed by them (especially if they hold a position of trust). This also allows for effective investigation and safeguarding for victims in circumstances where the position held by individuals could impact on the impartiality and independence of the police response.

In response to the Angiolini Report, this Privacy notices has been updated to ensure existing and prospective officers and staff are aware that they must be held to a higher standard of behaviour and accountability and that a right to privacy can be restricted in certain circumstances. These circumstances include, but are not limited to: recruitment, vetting, aftercare, transfer, promotion, role change, returning to policing and maintaining standards.

Statistical Information

Information provided on the vetting form may be used for the purposes of statistical information. Such data will be fully anonymised.

Rights in Relation to Processing

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require us to change incorrect or incomplete data;
- Require us to delete or stop processing your data where the data is no longer necessary for the purposes of processing;
- Object to the processing of your data where the organisation is relying on its legitimate interests as the legal basis for processing;
- Ask the organisation to stop processing data for a period if there is a dispute about whether or not your interests override our legitimate grounds for processing data

If you would like to exercise any of these rights, please contact DataProtection@surrey.police.uk or information.governance@sussex.police.uk. If you believe that the organisation has not complied with your data protection rights, in the first instance please contact the Data Protection Officer.

You can also complain to the Information Commissioner <https://ico.org.uk/concerns/>

Contact Us

If you have any concerns about how Surrey Police and Sussex Police has handled your personal information you should contact our DPO by:

Email	Sussex	DPO@sussex.police.uk
	Surrey	dataprotection@surrey.police.uk

Address	Sussex	Data Protection Officer Sussex Police Headquarters Church Lane Lewes East Sussex BN7 2DZ	Surrey	Data Protection Officer Surrey Police PO Box 101 Surrey Guildford GU1 9PE
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If you want to raise a concern with the Supervisory Authority

The Information Commissioner is the independent Authority responsible within the UK for ensuring we comply with data protection legislation. If you have a concern about how we have used your personal information or you believe you have been adversely affected by our handling of your data you may wish to contact them using the information below:

The Information Commissioner's Office,
Wycliffe House, Wilmslow, Cheshire, SK9 5AF

Telephone 0303 123 1113

Email casework@ico.org.uk

Further information about the ICO can be found [here](#).

Changes to our Privacy Notice

We keep our privacy notice under regular review. This privacy notice was last updated on 21/05/2024.

If we plan to use your personal information for a new purpose we will update our privacy notice and communicate the changes before we start any new processing.