

# Privacy Notice

**This privacy notice tells you how the Office of the Police Ombudsman for Northern Ireland (the Office) uses your personal information.**

This document provides in summary form a description of the types of personal information held by the Police Ombudsman's Office, where we got such information, why we have it and what we do with it.

It also sets out in summary form the rights of those people who are the subject of any information we hold.

## **The types of personal information we hold and who provided it to us:**

The personal information we hold includes material received from and is about:

- People who seek to make or have made a complaint about the conduct of a police officer and others exercising policing powers in Northern Ireland
- People who call our complaints line
- People who visit our Office
- People who visit our website
- People who make a complaint about the service we provide
- People who may pose a risk
- People who come to our attention during the course of handling complaints
- People who are or were our employees or have applied to join our Office or provide us with a service
- People who come to our attention during the course of handling complaints.

## **What we do with that personal information**

All the personal information held by the Police Ombudsman's Office is held for the purposes of fulfilling its statutory functions of providing an independent, impartial system for the handling of complaints and other matters about the conduct of police officers and others exercising police powers in Northern Ireland. We also process personal information for the purposes of human resources, finance and corporate services functions.

For each of the categories of people mentioned above, we may have to use your personal information in a particular way:

- **People who seek to make or have made a complaint about the conduct of a police officer and others exercising powers in Northern Ireland**

If you have made a complaint to us, we will need to collect some personal information about you if we are to progress your concerns: this will include your name, your contacts details and the relevant things you have told us about yourself. This may include e mails you have sent to us and any social media contact you have made with us.

During the investigation of your complaint, there may be occasions when we have to share some or all of the information you have provided us with:

- we may need to discuss some of the things you have told us with the police in general or certain police officers in particular;
- we may need to share some of your information with other agencies or experts as part of our investigation;
- if we believe a police officer may have committed a crime, we may need to share some of the information you have given us with the prosecution service; and
- if we believe a police officer may have committed an offence we may need to share the details you have given us with the Police's Professional Standards Department.

When we have finished dealing with your complaint, we will tell you the outcome and share that information with the police and the officer you have complained about.

- **People who call our complaints line**

We record and hold for a limited period all calls to our complaints line and to some other phone lines into our building, but not the number of the phone you have used to make the call.

- **People who visit our Office**

When you come to our Office, you will be asked to sign our visitor's book. You may also be captured on one of our CCTV cameras outside and within the building. We collect this information for security purposes and also for health and safety reasons.

- **People who visit our website**

When someone visits [www.policeombudsman.org](http://www.policeombudsman.org) we use a third party service to collect standard internet log information and details of visitor behavior patterns. This information is processed in a way which does not identify anyone. We do not, and do not allow anyone to attempt to find out the identities of those visiting our website. We have a separate privacy notice about information connected to our website.

- **People who make complaints about the service we provide**

If you have made a complaint to us about the services we have provided, we will need to retain that information while we deal with your concerns. If you are not satisfied with the way in which the Office has dealt with the matter, as per our Customer Complaints Policy, we will need to share some of your information with the external independent assessor.

- **People who may pose a risk**

If we believe that a person presents a risk to themselves or others, we may have to report our fears to the relevant body and provide it with information about that person. In such instances we tell the person in question what we are doing.

- **People who are or were our employees, have applied to join our Office or have provided us with a service**

If you have applied for a job in the Police Ombudsman Office we will have asked for a range of information about you. We receive this information from you as part of the application or from your referees as required. That personal information will only be used for the purposes of progressing your application or for any other related requirements.

All roles in PONI require a level of security vetting. Prior to the final offer of employment, you must successfully complete the vetting process. Vetting is completed by UKSV who provide a recommendation to us. Your application and all supporting information is provided to our Departmental Security Officer (Director of Corporate Services) who reviews the application and makes the final decision, in line with UKSV guidance. UKSV retains your information for a maximum of 15 years after expiration of the vetting clearance. You can read their Privacy Notice on their website for more information. We retain your vetting application information until a final decision is made, then the information is securely destroyed. You can view our Retention and Disposal Schedule on our website for more detailed information.

If you have been or become an employee of the Office we may share some of your information with other agencies for purposes such as providing pensions, occupational health or security vetting. We have contracts in place with such agencies to ensure that they hold the material in a secure manner and do not share it with others.

If you have been contracted to supply us with a service we may hold some personal information about the people who help draw up that contract and the people who actually deliver the service.

## **How We May Further Use Your Information**

We share personal information only when it is fair, lawful and appropriate to do so. This includes instances when it is necessary:

- for the performance of our statutory duties as prescribed by the Police (NI) Act 1998 and associated legislation to secure the efficiency, effectiveness and independence of the police complaints system;
- for us to comply with our legal obligations as set out in Part VII of the Police (NI) Act 1998 (the 1998 Act) when investigating complaints, and referrals (as well as won motion investigations) about the conduct of police officers;
- to provide information to the Department of Justice or Secretary of State in compliance with Section 63 (1)(b) of the 1998 Act;
- to provide information for the purposes of any criminal, civil or disciplinary proceedings in compliance with Section 63 (1)(d) of the 1998 Act;
- to provide information in the form of a summary or other general statement made by the Ombudsman in compliance with Section 63 (1)(e) of the 1998 Act;
- to provide information to the Coroner's Service NI in compliance with Section 17A of the Coroners (Northern Ireland) 1959 Act;
- to provide information in order to fulfill our statutory obligations under Freedom of Information and Data Protection legislation;
- to protect your 'vital interests' or in exceptional circumstances that of another person;
- to comply with statutory obligations relating to employment or other legislation;
- to comply with our statutory obligations pursuant to section 5(1) Criminal Law Act (NI) 1967 and section 17 of the Anti-Terrorism Crime and Security Act 2001;
- to provide information to the Criminal Case Review Commission in compliance with Section 17 of the Criminal Appeals Act 1995; and
- to the Police Ombudsman Independent assessor of complaints when you wish to complain to her at the conclusion of the internal complaints process.

Once your investigation and any related proceedings have been completed, we retain your personal information in line with our Retention and Disposal policy. There may be occasions when we are required to share this information prior to its disposal.

## **How We Protect Your Personal Information**

In handling your personal information we:

- take all steps we can to safeguard it
- make sure only those staff who are required to see certain information as part of their job have access to it
- make sure those staff are trained and managed to ensure its safety
- regard any failure by a member of staff to adhere to the principles of data protection as a possible disciplinary or criminal matter
- will report any significant loss of data to the Information Commissioner's Office and
- will take all the steps we can to ensure that information is not held for longer than is necessary.

We require our staff to:

- protect the personal information we hold
- not use this information in any way outside their professional role
- comply with the Data Protection and Office's Security policies which include measures to ensure information is kept in a secure environment and that personal information held electronically is protected by secure passwords and is not compromised
- comply with the Office's Retention and Disposal schedule.

## **How long do we keep your information?**

The Office retains information collected in line with the Retention and Disposal Schedule which is available in the 'Access to Information' section of our website. Some personal information may be archived in a secure storage facility prior to being destroyed. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

## **Your right to access the information we hold about you**

Under the Data Protection Act (2018) and EU General Data Protection Regulation 2016 (GDPR), you have rights as an individual which you can exercise in relation to the information we hold about you.

You can ask to access your personal information the Office holds. We must provide the information to you within one month of receipt of request unless an exemption applies in the Information Acts or the Office's legislation.

Address: Information and Communications Unit  
Police Ombudsman for Northern Ireland  
New Cathedral Buildings  
St. Anne's Square  
11 Church Street  
Belfast  
BT1 1PG

Email: [info@policeombudsman.org](mailto:info@policeombudsman.org)

## **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 23 June 2023.