

Privacy Notice for

**Members of the Public and Complainants**

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

This Office provides an independent, impartial system for the handling of complaints about the conduct of police officers.

This Privacy Notice tells you what to expect when the Office collects personal information about:

* Individuals who seek to make, or have made, a complaint about the conduct of a police officer
* Individuals who make a service standards complaint about the Office’s service
* Visitors to our Office
* People who call our complaints line
* People who email us
* People who contact us via social media
* Visitors to our website

Please see our separate Privacy Notice for Job applicants, current and former members of staff for information specifically about them.

If you send us an email or letter asking for information that relates to another body or organisation, we will direct you to the relevant organisation and provide you with the necessary contact information.

All of the Office’s investigations are conducted in private. The Office will only share personal information when it is fair, lawful and appropriate to do so.

# Our legal basis for collecting your information

We use and share your data in circumstances where:

* it is necessary for us to comply with our legal obligations as set out in Part 7 of the Police (NI) Act 1998 when investigating complaints about the conduct of police officers.
* 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 sytem.
* it is necessary to protect your ‘vital interests’ or in exceptional circumstances that of another person, .
* it may be necessary to comply with statutory obligations pertaining to employment legislation.

# What information do we collect about you and how do we use that information?

## Individuals who have made a complaint about a Police Officer

To allow us to determine how to progress your complaint, we need to collect and share your personal information. We collect personal information about you when we receive a complaint. This information is recorded on a computer and in a physical complaint file. When we initially receive your complaint, we may need to ask the police officer(s) and relevant policing body for further details. In doing so we will share your personal information with them and we may also seek advice from a person with specialist knowledge. We may also share your personal information with the Public Prosecution Service if it is a criminal matter. On completion of the investigation, we will write to you with the outcome of the investigation and will also notify the complained against person and policing body named in your complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We will keep personal information contained in complaint files in line with our Disposal and Retention Policy. This means that information relating to a complaint will be retained for a minimum of three years from closure. It will be retained in a secure environment and access to it will be restricted according to the ‘need to know’ principle.

Further information regarding our investigative processes can be found in the information leaflets available in the Publications section on our website.

Other circumstances when we will share your personal information:

**Information Commissioner’s Office**

We can share information with the Information Commissioner in certain circumstances. Where it appears that matters concerning the Data Protection Act or Freedom of Information Act 2000 should be brought to the attention of the Information Commissioner we will share relevant information. We will inform you if this information sharing occurs in relation to your complaint.

**Health and safety risk**

We can share information with any appropriate person where a person is likely to constitute a threat to the health and safety of any other person. Such instances are rare and we will inform you if this information sharing occurs in relation to your complaint.

**Other Ombudsmen**

We can share information with other ombudsmen, if, at any stage in the course of considering a complaint or conducting an investigation, the Office forms the opinion that the matter could be the subject of an investigation by a person listed in their legislation.  We will inform you if this information sharing occurs in relation to your complaint.

## Individuals who make a service standards complaint about the Office’s service

When we receive a complaint about our service standards we record this information on computer and in a physical file. This information contains the personal information of the individual making the complaint and the subject of the complaint, which may be a person or department. We process this information for the purposes of dealing with the complaint.

[Further information about how to make a complaint about the service provided by the Police Ombudsman's Office can be found on our website.](https://www.policeombudsman.org/About-Us/How-to-complain-about-the-Police-Ombudsman-s-Offic)

## Visitors to our Office

When you come to our Office, we will ask you to sign the visitor’s book and provide your name and organisation you work for if applicable. We collect this information for security purposes and also for health and safety in case of fire or emergency while you are visiting.

The Office has CCTV cameras outside the building and also in some main areas inside the building such as the stairwells. This is solely for the purpose of security. These cameras may capture your image, of which the recordings are destroyed after three months.

## Incoming and outgoing telephone calls

All incoming and outgoing telephone calls are recorded to assist the organisation in fulfilling its statutory functions.  The recordings of the calls will be kept for one year and then destroyed as per our Disposal and Retention Schedule.

## People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government practice. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

## People who contact us via social media

If you send us a private or direct message via social media, the message will be retained by the social media provider. It will not be shared with any other organisations.

## Visitors to our website

When someone visits [www.policeombudsman.org](http://www.policeombudsman.org/) we use a third party service, Good Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various part of the site. This information is processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

This privacy notice only covers our website.  It does not cover the links within this site to other websites.  We encourage you to read the privacy statements on the other websites you visit.  For more detailed information about our website, please go to the [Privacy Statement for Website](https://www.policeombudsman.org/About-Us/Access-to-Information/Privacy-Notices/Website-Privacy-Notice).

# How long do we keep your information?

The Office retains information collected in line with the Disposal and Retention 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:

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 Directorate  
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)

Under the Data Protection Act, you have rights as an individual which you can exercise in relation to the information we hold about you.

## Changes to this privacy notice

We keep our privacy notice under regular review.  This privacy notice was last updated on 24 September 2019.