

# **SERVICE POLICY**

## **Non-Personal Data**

### **INTRODUCTION** 2

### **KEY INFORMATION**

2.1 Policy Statement(s)	2
2.2 Scope	4
2.3 Name of Directly Supporting Procedural document(s)	4

### **FURTHER INFORMATION**

3.1 Impacted Policies	5
3.2 Other Impacted Procedure	5
3.3 Associated Non LFRS Documents	5

## **Document History**

**Responsible Department**  
**Information Governance**

**Version No. 4**

Created	April 2007
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## INTRODUCTION

This policy explains what we aim to do in order to comply with the relevant legislation associated with the supply of non-personal information, specifically rights of public access to information held by public authorities.

In its most basic form, non-personal information or data is any set which does not contain personally identifiable information. This in essence means that no individual or living person can be identified by looking at such information or data. It can also relate to data which was initially personal data, but later made anonymous.

We must have organisational measures in place and be able to show that our processing of requests for non-personal information from non employees are in accordance with the Freedom of Information Act 2000 (FOI), the Environmental Information Regulations 2004 (EIR) and other relevant legislation, statute and best practice.

## KEY INFORMATION

### 2.1 Policy Statement(s)

- 2.1.1 We aim to freely share non-personal information between employees for internal Service use without routinely using FOI or EIR legislation.
- 2.1.2 We will have a Publication Scheme that makes information readily and easily available in the public domain to view for anyone who has an interest.
- 2.1.3 We aim to have systems in place that make requesting and processing non-personal information simple, open and transparent.
- 2.1.4 We aim to process all requests received in accordance with relevant legislation, and their associated statutory time periods for response. We will keep records of our performance and publish them.
- 2.1.5 We will provide appropriate advice and assistance to people making non-personal information requests.
- 2.1.6 We aim to identify and source the information that has been requested no matter how hard it is to find.

- 2.1.7 We will comply with all requests for non-personal information unless a lawful exemption from our duty to disclose applies.
- 2.1.8 When we refuse or withhold by lawful exemption disclosure of non-personal information, we will explain to requesters why we have taken this decision.
- 2.1.9 We aim to charge people fair and appropriate fees for the provision of non-personal information when we are entitled to do so. When charges apply, we will first establish if there is any way information or part information can be disclosed without such charges being made.
- 2.1.10 We aim to keep accurate records of requests for information, including the detail in the responses that we gave so that they are available for future use and inspection.
- 2.1.11 We aim to follow best practice in connection with the storage, management and disposal of non-personal data held by the Service.
- 2.1.12 We aim to have non – personal information processes, procedures and guidance for our staff to follow.
- 2.1.13 We will share, if requested, our procedures and how we record, store and supply information upon application.
- 2.1.14 We aim to provide suitable training to our employees, enabling them to manage information requests appropriately and to respond when acting as information providers.
- 2.1.15 We aim to carry out periodic reviews of our information procedures, or in light of changes to legislation, amending them as required.
- 2.1.16 We will have an internal review and complaints process should an information requester not agree with our response, and we will inform people of their right to complain.
- 2.1.17 Any actions leading to a breach of this policy, or failure to report it, will be investigated and may be subject to the Service's disciplinary procedures and criminal investigation.

## 2.2 Scope

### 2.2.1 All Employees

All our employees have a duty to;

- Be aware of relevant legislation;
- Understand and comply with your responsibilities within required timeframes; and
- Act fairly and lawfully when sharing information with each other or with third parties.

### 2.2.2 Information Governance Manager (Data Protection Officer)

The Information Governance Manager has responsibility for ensuring that where we can, we comply with relevant legislation. They aim to do this by performing an advisory and monitoring role, and by overseeing the implementation of measures to support this policy.

### 2.2.3 Information Governance Officer (Deputy Data Protection Officer)

The Information Governance Officer supports the Information Governance Manager in the implementation of measures to support this policy.

### 2.2.4 Assistant Chief Fire and Rescue Officer (Service Support) (ACFO)

The ACFO (Service Support) is the Senior Information Risk Owner (SIRO). The SIRO is accountable and responsible for information risk across the Service.

### 2.2.5 Chief Fire and Rescue Officer (CFO)

The CFO is ultimately responsible for non-compliance with relevant legislation and is accountable to the Information Commissioner (Head of the Information Commissioners Office [ICO] that is the Supervisory Authority for the United Kingdom)

## 2.3 Name of Directly Supporting Procedural document(s)

<i>Document Name</i>	<i>Version</i>	<i>Date Published</i>	<i>Department</i>
Access to Non-Personal Data	V1.0	Sept 2018	Information Governance
Liability Claims	V2	Feb 2023	Information Governance
ICT Users Code of Conduct	V1	Dec 2021	ICT

*Note: This subject will impact on any of our procedures which deal with the distribution of information internally or externally for any reason.*

## FURTHER INFORMATION

### 3.1 Impacted Policies

<i>Policy Name</i>	<i>Version</i>	<i>Date Published</i>	<i>Department</i>
Personal Data Policy	V1.0	October 2020	Information Governance

Note: This Policy will impact any other policy which includes the use of data and information in any way.

### 3.2 Other Impacted Procedure

<i>Policy Name</i>	<i>Version</i>	<i>Date Published</i>	<i>Department</i>
Access to Personal Data	V1.0	01/09/2018	Information Governance

### 3.3 Associated Non LFRS Documents

<i>Documents</i>	<i>Version</i>	<i>Date Published</i>
Freedom of Information Act 2000	V1.0	30/11/2000
Environmental Information Regulations 2004	V1.0	21/12/2004
Public Records Act 1958	V.1.0	23/07/1958

## Document History

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June 2014	2	Updated to include correspondence received via social media		ICCM
March 2019	3	Supply of Non-Personal Information Policy	Service Assurance	SMT
21/4/21	4	Policy revised and transferred to new template	Information Governance	SMT
24/3/2022	4	Doc review with no changes	Information Governance	SMT
1/2/2023	4	Doc review with no changes	Information Governance	SMT