

*All gists in the following extract have been double-underlined



AUTHORISATION OF BULK PERSONAL DATASET

1. Definition

This Authorisation Form records the justification for SIS' handling and usage of specific bulk personal datasets. Bulk personal datasets are acquired under Section 2(2)(a) of the Security Service Act 1989 or Sections 2(2)(a) or 4(2)(a) of the Intelligence Services Act 1994 and have the following characteristics:

- They comprise personal data as defined by section 1(1) of the Data Protection Act 1998;
- They relate to a wide range of individuals, the majority of whom are unlikely to be of intelligence interest;
- They are held, or are acquired for the purpose of holding, on one or more analytical systems within SIS.

2. Acquisition Case to be completed by the Acquiring Officer

Dataset Codename and File Reference	
Data Owner NB: A senior SIS official will be the data owner unless specified. This means a senior SIS official will have devolved responsibility for 'Action On'.	
Description of Dataset Content NB: This description will be used in lists of datasets presented to oversight bodies (e.g. the Foreign Secretary, the ISC, the Intelligence Services Commissioner) and will be seen by staff in the relevant directorate who manage the Service's bulk data records.	
Sanitised Description of Dataset Content NB: This description will be used on the database.	
Source [redacted]	
Date of Acquisition (DD/MM/YYYY)	
Proposed frequency of update	<select>
Protective Markings	<select> <select>
National Caveat	<select> Other:
Who is responsible for Action On? (Designation/Organisation) NB: Please specify only if different from the data owner or if data is not owned by SIS [redacted]. The Officer stated will be expected to respond to enquiries from HO teams, [redacted] and Duty Officer when required	
Any special Action On handling requirements [redacted]	
Can this Dataset be Shared in bulk?	SIA: Yes ☐ No ☐ [redacted]
Media Serial Number	

Necessity

Please explain why it was necessary for SIS to acquire this data covering the following points:

- Which NSC strategic intelligence priorities does this acquisition meet?
- What results or benefit do you expect it to provide in relation to SIS's functions and the purposes of UK national security, economic wellbeing of the UK and the detection/prevention of serious crime?

Risks of holding this data to SIS and to wider HMG

NB: The operational risks around acquisition of this data should have been dealt with elsewhere (e.g. KD, submission etc)

Please comment on the following:

- What are the risks of holding this dataset that might have the potential to cause political or reputational embarrassment? Consider also if there could be economic impact on the UK or the risk of litigation.
- What is the damage to SIS' operational equities should SIS possession of this dataset become known? What impact could there be on our capabilities and operations?

Overall classification of Risk	<select>
Designation/Staff Number	
Date	

3. Data Intrusiveness (to be completed by the Transformation Officer)

Contains Data on UK Nationals?	Yes ☐	Reasonably Likely ☐	Unlikely ☐	No ☐
How have you reached this assessment?				
Contains Data on Minors (under 16s)?	Yes ☐	Reasonably Likely ☐	Unlikely ☐	No ☐
How have you reached this assessment?				
Does the dataset contain any categories of personal data deemed to be particularly intrusive?	Yes No			
Yes No	Financial	☐	☐	

Religion	☐	☐	Criminal Activity	☐	☐
Political (including trade union membership)	☐	☐	Legally Privileged Info	☐	☐
Racial/Ethnic Origin	☐	☐	Journalist Info	☐	☐
Disability/Medical Condition	☐	☐	Medical Info	☐	☐
Sexual Orientation	☐	☐	Spiritual Counselling	☐	☐
If 'Yes' is ticked for any of the above, please provide further details					
Designation/Staff Number					
Date					

4. Exploitation Case (to be completed by the Exploitation Officer)

Proposed exploitation system(s) for the dataset (the SIS database, [redacted] etc)						
If section 3 above indicates that information on minors is present or is reasonably likely to be present, is this to be exploited?	Yes, it will be exploited ☐ (NB: ensure a specific justification for this is included below)					
	No, it will not be exploited ☐ (NB: state below if the information will be deleted)					
If section 3 above indicates that there are categories of personal data present that are deemed to be particularly intrusive, please indicate whether these will be exploited and on which systems they will be available (please tick all that apply)						
NB: If any category is to be exploited, a specific justification must be included below. If a category is not to be exploited, state below if the information will be deleted.						
	Will not be exploited	[redacted] only	The database [redacted]	[redacted]	Standalone system	Other (please specify)
Religion	☐	☐	☐	☐	☐	
Political (including trade union membership)	☐	☐	☐	☐	☐	
Racial/Ethnic Origin	☐	☐	☐	☐	☐	
Disability/Medical Condition	☐	☐	☐	☐	☐	
Sexual Orientation	☐	☐	☐	☐	☐	
Financial	☐	☐	☐	☐	☐	
Criminal Activity	☐	☐	☐	☐	☐	
Legally Privileged Info	☐	☐	☐	☐	☐	
Journalist Info	☐	☐	☐	☐	☐	

Medical Info	☐	☐	☐	☐	☐
Spiritual Counselling	☐	☐	☐	☐	☐

Intrusion of Exploitation

What is the assessment of the level of actual and collateral intrusion?

- Actual: the intrusion of (or interference with) privacy caused by accessing personal data as a result of analysis to identify and investigate intelligence targets;
- Collateral: the intrusion or interference with privacy of individuals who are not of intelligence interest, which happens as a consequence of the analytical process.

Classification of Actual Intrusion	<select>
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Classification of Collateral Intrusion	<select>
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Justification

- How will SIS make use of this data? What intelligence benefits are to be derived from exploitation of the data?
- If the dataset contains information on minors or categories of personal data deemed to be particularly intrusive, ensure you make a specific justification for holding and/or using each of these categories.
- Given the potential to intrude into the privacy of individuals contained in this dataset, explain why the continued retention and/or exploitation of the dataset is necessary and proportionate.

[redacted]

Given all of the above, I judge that it is necessary and proportionate to retain/to retain and exploit [delete as appropriate] this dataset. Retention of this dataset will be reviewed regularly by SIS's Data Retention Review Panel.

Designation/Staff Number	
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Date	
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5. Legal Advice (to be completed by Legal Advisors)

I am satisfied that holding this data complies with the Intelligence Services Act 1994 (ISA 1994), Data Protection Act 1998 (DPA 1998) and Human Rights Act 1998 (HRA 1998):

I am satisfied that holding this data complies with the Intelligence Services Act 1994 (ISA 1994), Data Protection Act 1998 (DPA 1998) and Human Rights Act 1998 (HRA 1998):

- ISA 1994 – it falls within SIS powers to acquire data under section 1(1)(a) of ISA 1994. Section 1(1)(a) provides that one of SIS's functions shall be to obtain information relating to actions of persons outside the British Islands. These functions are exercisable in the interests of national security (with particular reference to the defence and foreign policies of Her Majesty's Government in the UK), the economic well-being of the UK or in support of the prevention or detection of serious crime (section 1(2) ISA 1994).
- DPA 1998 – processing this data is necessary for the exercise of functions conferred by an enactment i.e. ISA section 1. Processing this data will, therefore, be lawful as provided for by DPA 1998 Schedule 2 para 5(b) and, to the extent that it may apply in this case, Schedule 3 para 7(1)(b). Where necessary for the purpose of safeguarding UK national security, SIS will rely on the exemption under section 28 of the DPA 1998.
- HRA 1998 – holding this data may amount to an interference with article 8 of the ECHR however this will be justifiable as it is necessary for the legitimate aim[s] of [acting to protect national security in the UK AND/OR acting in the interest of the economic well-being of the UK AND/OR acting in support of the prevention or detection of serious crime]. This dataset contains [insert details of the nature of the data]. It will be used [insert brief description of how it will be used and refer back to the relevant parts of the authorisation for JIC/NSC requirements/other justification].

[If relevant] As mentioned above the dataset contains records for minors. Retaining minors in the data set is necessary and proportionate as it may enable SIS to identify intelligence targets due to the presence in the data of both the target and their children. Intelligence targets often do not disclose information relevant to SIS's interest but they provide information about their family structure which enables SIS to gather information that allows SIS to positively identify the target.

[If relevant] This dataset contains information that SIS judges to be particularly intrusive. [It is considered necessary and proportionate to retain and exploit this information for the reasons set out in section X, above OR as set out in section X, above, this data is not to be retained and will be deleted].

Holding [and exploiting (if applicable)] this dataset is proportionate to the legitimate aims identified, as there is a reasonable balance between the intrusiveness of the personal data (judged to involve a [high OR medium OR low] level of actual intrusion and a [high OR medium OR low] level collateral intrusion) and the benefit to be gained, [noting that: (i) the data contains no particularly intrusive categories of personal data (see section 3 above) AND/OR (ii) the data is commercially available AND/OR (iii) it is not considered that the same intelligence outcome could be achieved through less intrusive means of exploitation.]

Accordingly, I am satisfied that the legal implications have been adequately examined and consider that it is lawful to retain and exploit this dataset

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6. Data Authorisation (to be completed by a senior SIS officer)

I am satisfied that it is necessary and proportionate for SIS to retain and/or exploit this data set as described above, and that satisfactory arrangements exist for ensuring proper management and protection of the data.
I authorise the retention and/or exploitation of this dataset.

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