

[REDACTION]

NOTE: REDACTIONS ARE INDICATED [REDACTION] AND GISTS ARE IN BOLD, DOUBLE-UNDERLINED AND ITALICS

## **LOOSE MINUTE**

To: DDG  
From: MI5 Official  
Ext. No: [REDACTION]  
Date: 21 October 2014  
File Ref.: [REDACTION]  
Copied To: Legal adviser and MI5 officials

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**SUBJECT: Bulk Personal Data – Proposal to adopt flexible review periods**

1. The relevant team would like to change the way MI5 carries out its reviews of bulk personal data (BPD). This is in response to feedback from business sections about the heavy workloads associated with the current process, and our desire to adopt a more risk based approach. Your approval is requested.

2. The attached Loose Minute describes the proposed approach. In essence, we intend to use our assessments of (i) levels of intrusion and (ii) sensitivity/corporate risk as the primary factors in determining review periods:

HIGH Intrusion and/or HIGH Corporate Risk	<b>6 months</b>
MEDIUM Intrusion and/or MEDIUM Corporate Risk	<b>12 months</b>
LOW Intrusion and/or LOW Corporate Risk	<b>2 years</b>

3. The proposal has been circulated to members of the Bulk Data Review Panel out of committee. There have been no objections, and all comments received have been supportive. Senior MI5 Official, in his capacity as chair of the BDRP, is content. In terms of SIA alignment, GCHQ already uses flexible review periods (6 and 12 months), and SIS has approved (but not yet implemented) moving to a more complex formulation for flexible reviews ranging between 12 and 42 months.

4. If you are content, we would like to implement the new process with immediate effect.

5. We will need to notify the Home Office and Intelligence Services Commissioner. Draft letters for you to send each are attached. We recommend offering the IS Commissioner to discuss this with us during his inspection in December.

MI5 Official

[REDACTION]

GENERAL INSTRUCTIONS

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