

[REDACTED]

BPD guidance, Inter-agency data release from and BPD review panel terms of reference, in force as at 1 June 2014 onwards

Double underlined sections have been gisted for OPEN.

Release of raw Sigint data to the SIA community –as at 1 June 2014 to present

Release of Raw Sigint Data to the SIA Community

What is the Data Exchange Process?

The Data Exchange Process enables IPTs to share data with BSS and SIS (and vice versa). The relevant team, as GCHQ's Release Authority, is responsible for all raw Sigint Data release in support of the Data Exchange Process.

For Sigint data to be released in support of the Data Exchange Process it must comply with the Key Principles of Raw Sigint Data Release.

How do I send data to MI5/SIS?

1. The Requesting agency must fill in an Inter-Agency Data Release Form. The relevant POCs are the relevant teams in SIS and MI5.
2. SIS/MI5 should send the request to the relevant team.
3. The relevant team will then approve or deny the request.
4. On receipt of policy approval, the GCHQ POC should arrange for the data to be prepared and sent. This will usually be done via email, [REDACTED].
5. An Intelligence report record must be completed in the relevant database to record the data release. This should include:
 - a. The heading SIA Data Release,
 - b. Details of the data set released, including times and dates where appropriate,
 - c. The data source code,
 - d. Any unique handling instructions that accompanied the data release.
6. The intelligence report reference number must accompany the data as a means of identification and accountability. If using relevant system, the report reference should be included as the title in the relevant system exchange.
7. There is no longer a requirement to keep a copy of the actual data sent, unless requested to do so by the relevant team.

How do I request data from MI5/SIS?

1. The requestor (relevant senior GCHQ official) must find a sponsor to approve the request. In general the sponsor should either be the Senior User for this type of work, or if it is IPT specific then it should be the relevant GCHQ senior official.
2. An internal approval to acquire the data is sought by filling in a Data Acquisition Authorisation, or DAA form accessed from the relevant team's web page which is sent to the relevant teams for approval.
3. Once the relevant team have authorised the DAA, an Inter-Agency Data Release Form can be completed by the requestor, and passed to MI5/SIS who will then make

[REDACTED]

[REDACTED]

a decision on whether to pass the data to GCHQ. The providing agency will complete the return half of the form and arrange for the data to be sent to us.

[Inter-agency data release form](#) 23 October 2014 to present

Data Sharing Request

The requesting agency should complete the form below which should then be sponsored by a group leader or equivalent (relevant senior GCHQ officials). The donor agency should approve the request [redacted]. In the case that GCHQ is a recipient please forward a copy of the completed and authorised form to relevant Points of Contact in GCHQ for filing.

Request reference	
Date of request	
Name/contact details	
Authorised statutory purpose	
Data description to include source details e.g. Access description / <u>data source codes</u> (inc required date range)	
Business case/justification (inc necessity and proportionality)	
Intended use and dissemination of data	
Responsible owner of received data at recipient organisation	
Proposed data retention period [REDACTED]	
Other comments	<i>(e.g requested delivery method and</i>

[REDACTED]

	<i>frequency)</i>
Sponsored by	

Data Sharing Response

The donor agency should complete the following and return it to the requesting agency.

Data sharing authorised by whom and when.	
Classification of the dataset	
Other caveats	
Intrusion of the dataset.	
Expected delivery timescale	

NB for Bulk Personal Data being received by GCHQ from another agency please also refer to the internal webpage Data Acquisition Authorisation).

Inter-agency data release form as at June 2014 to October 2014

Data Sharing Request

The requesting agency should complete the form below and get it authorised by a relevant senior official. Then send it to the donor agency (GCHQ: [REDACTED], SIS: [REDACTED] and MI5: [REDACTED]).

Request reference	
Date of request	
Name/contact	

[REDACTED]

[REDACTED]

details	
Authorised statutory purpose	
Data description (inc required date range)	
Business case/justification (inc necessity and proportionality)	
Intended use and dissemination of data	
Responsible owner of received data	
Proposed data retention period	
Other comments	
Authorised by	

Data Sharing Response

The donor agency should complete the following and return it to the requesting agency.

Data sharing authorised by whom and when.	
Classification of the dataset	
Other caveats	
Intrusion of the dataset.	

[REDACTED]

Expected delivery timescale	
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BDP Review Panel Terms of reference – 25 March 2015 to date

Bulk Personal Data Review Panel: Terms of Reference

Introduction

These Terms of Reference (ToR) set out the purpose and functions of GCHQ's Bulk Personal Data Review Panel (the Panel).

The ToR derive for the most part from the [SIA Bulk Personal Data Policy](#), agreed by all three Intelligence Agencies under the Accord programme. They supersede the draft ToR under which the Panel has been operating since its inception in 2010.

Purpose

The purpose of the Panel is to provide effective senior oversight of the lifecycle¹ of Bulk Personal Data in GCHQ's possession, thereby providing assurance that GCHQ handles Bulk Personal Data appropriately and in accordance with the law.

Composition

The Panel will be chaired by a Director or Deputy Director.

The Panel will include senior representatives of the relevant teams.

Representatives of MI5 and SIS will be invited to attend Panel meetings.

Functions

The Panel's primary functions are:

- to consider requests from the business to authorise continued retention and exploitation of Bulk Personal Datasets, with particular regard to necessity and proportionality, and
- to satisfy itself that GCHQ's handling of Bulk Personal Data throughout its life-cycle meets required standards, as described in the SIA Bulk Personal Data Policy.

Authorisation of the initial acquisition of a Bulk Personal Dataset is not part of the remit of the Panel as a whole, although such requests must be approved by a Panel

¹ The life-cycle stages are Acquisition, Use, Sharing, Retention and Deletion/Destruction. The definitions of Bulk Personal Data and of these stages are given in the SIA Bulk Personal Data Policy, linked above.

[REDACTED]

member, wherever possible before a dataset is acquired and in all circumstances before it is loaded into a GCHQ system for exploitation.

Similarly, the following must be authorised in advance by a Panel member:

- any novel or experimental use of Bulk Personal Data, e.g. for the testing of new analytical techniques or technical capabilities,
- any proposal for GCHQ to share Bulk Personal Data with another Agency, whether by passing a copy of the data to another Agency or by granting access to the data on GCHQ systems.

Process

The Panel will meet approximately every six months, typically in March and September.

It will review paperwork relating to datasets that fall due for review at each meeting, considering especially:

- the adequacy of the information provided in the Bulk Personal Data form,
- the quality of the case (if any) made by the business for the retention of the Bulk Personal Dataset, in terms of its value and level of use set against the sensitivity, intrusiveness and corporate risk of continued retention, and
- the arrangements and plans for the continued acquisition (if applicable), storage, exploitation, sharing and ultimate deletion/destruction of the data.

If a request for retention is submitted, the Panel will either:

- authorise retention for whatever period it sees fit, [redacted], or
- authorise provisional or temporary retention with stipulations or conditions, or
- reject the request and require the deletion/destruction of the Bulk Personal Dataset in question.

If no such request is received, the Panel will require evidence of the deletion of the Bulk Personal Dataset.

At each meeting, the Panel will also:

- require evidence of the satisfactory completion of actions from the previous meeting, especially deletion of Bulk Personal Datasets where permission to retain was refused; and
- confirm or modify its assessment of the intrusiveness and sensitivity of GCHQ's possession of the datasets under review.

All Panel decisions must be recorded.