

[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

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	6 months
MEDIUM Intrusion and/or MEDIUM Corporate Risk	12 months
LOW Intrusion and/or LOW Corporate Risk	2 years

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]

NOTE: REDACTED AND INDICATED REDACTED WORDS AND PHRASES ARE IN BOLD
SOURCE: UNDERWRITER AND PART OF

LOOSE MINUTE

To: [REDACTED]

From: [REDACTED]

Ext. No: [REDACTED]

Date: 21 October 2014

File Ref: [REDACTED]

Copies To: [REDACTED]

SUBJECT: Bulk Personal Data - Proposed to adopt for the review periods

1. The proposed changes would like to change the way this data is reviewed at bulk personal data (BPD). This is in response to feedback from business customers about the heavy workload associated with the current process, and our desire to reduce a more fair based approach. Your advice is requested.

2. The attached loose minute describes the proposed changes to streamline the process to use our assessments of (i) level of intrusion and (ii) sensitivity/complexity risk as the primary factors in determining review periods.

- LOW intrusion and/or LOW complexity risk: 3 months
- MEDIUM intrusion and/or MEDIUM complexity risk: 12 months
- HIGH intrusion and/or HIGH complexity risk: 18 months

3. The proposal has been drafted to mirror the BPD Data Review Panel and its committee. There have been no objections and all comments received have been supportive. **Senior IT Director** in his capacity as chair of the BPD is content in principle with the proposal. **IT Director** has already seen the data review process in his capacity as chair of the BPD and has approved (but not yet implemented) moving to a more complex formulation for the data reviews ranging between 12 and 18 months.

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

5. We will need to notify the Data Office and Intelligence Services Commission. Data Office for you to send with the attached VAP recommendation during the 15 Commission to discuss this with us during the expected in October.

MRS [REDACTED]