

Scottish Raptor Monitoring Scheme: Data Sharing & Use Policy

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1. Introduction

This document sets out our policy on sharing and use of the data we hold. The policy helps us achieve a rational and consistent approach towards the management of data availability and use. It is intended to help our data providers and users better understand our aims and intentions. We want those that provide us with data to understand how it will be used and made available to others. We want those that use the data we hold to understand the rationale behind any constraints we place on the availability of data.

1.1 A note for data providers

Thank you for providing your raptor data to the SRMS. Your data is fundamental to the SRMS, allowing it to monitor and report on the health of Scottish raptor populations, understand the causes of population change and identify problems that conservation non-governmental organisations, statutory agencies and ultimately Scottish Government can act on to conserve raptors effectively. We recognise that many of you collect data in a purely voluntary capacity, for which we are extremely grateful. We also recognise that much expertise in local raptor populations is held by those that collect the data on the ground, which is why through this policy we will encourage all data users to liaise with data providers wherever possible, to help provide local knowledge and context for the uses to which these data are being put. Local liaison will not always be possible though and this policy is trying to ensure that your data can be at the fingertips of conservation professionals in SRMS partner organisations so that they can make effective decisions to benefit raptors at a local, regional, national and even international level.

Please note that when you submit your data to the SRMS you are agreeing to share it for use by the SRMS for routine reporting and analysis purposes (as agreed through the SRMS Annual Work Plan), with SRMS partners, with the National Wildlife Crime Unit and, at appropriate resolution, with the public via the Atlas of Living Scotland.

1.2 A note for data users

Thank you for your interest in using SRMS data for Scottish breeding raptor populations. The data currently consist of a record per individual breeding attempt from many discrete study areas (and more casual recording) across Scotland, providing information on occupancy and breeding outcomes.

SRMS data are available on the Atlas of Living Scotland (<https://registry.nbnatlas.org/public/show/dp245>) at a 10 km resolution (10 km x 10 km square), which may be adequate for your purposes. If you are a conservation professional working for one of the nine SRMS partner organisations, you may already have access to the SRMS data and will be able to liaise with a named individual within your organisation who governs internal access to SRMS data. If you are not affiliated with an SRMS partner organisation, this policy explains how you can request more detailed access to SRMS data for specific purposes via the SRMS Data Request process.

Many of the SRMS regular data providers spend huge amounts of time in the field studying raptors and collecting monitoring information, many in a purely voluntary capacity. As such, these observers hold a large amount of local knowledge that cannot be captured within a typical standardised dataset like that held by the SRMS. They are best placed to advise on how to interpret local and regional raptor data. **Whenever possible, we would strongly encourage you to liaise with these local observers/data providers to enable you to make more informed decisions about how to use SRMS data. This is particularly important if you are using the data to make detailed decisions at a fine scale.** Useful contact information can be accessed on the SRMS website (see <http://raptormonitoring.org/srms-data/data-sharing-use-policy/1-2-a-note-for-data-users/srms-data-provider-contacts>).

Please also note that the SRMS will, at any time, only hold records collected in the previous breeding season. Records from any particular field season are typically submitted in the following autumn and are not added to the master dataset until the spring of the following breeding season. Therefore, if you require urgent information during a current breeding season, you will need to contact the relevant SRSG branch(es) directly (see <http://raptormonitoring.org/srms-data/data-sharing-use-policy/1-2-a-note-for-data-users/srms-data-provider-contacts>).

Please take the time to understand the nature of the data held by the SRMS and heed any terms and conditions associated with their use. Please consider the considerable benefits of liaising with SRMS data providers ahead of making any use of SRMS data.

2. Definitions

SRMS	The Scottish Raptor Monitoring Scheme (SRMS), which is a repository for Scotland-wide breeding raptor monitoring data.
SRMS partner	One or more of the nine organisations making up the SRMS partnership: British Trust for Ornithology (BTO), Scottish Forestry (FS), Forestry and Land Scotland (FLS), Joint Nature Conservation Committee (JNCC), NatureScot ¹ , Rare Breeding Birds Panel (RBBP), Royal Society for the Protection of Birds Scotland (RSPB Scotland), Scottish Ornithologists' Club (SOC) & Scottish Raptor Study Group (SRSG).
SRMG	The Scottish Raptor Monitoring Group (SRMG) consists of representatives of the nine SRMS partner organisations. The SRMG is chaired by NatureScot and the SRMG meet regularly to oversee the work of the SRMS.
SRMC	The Scottish Raptor Monitoring Coordinator (SRMC) is the person employed by SRMG to deliver the work of the SRMS. The SRMC is the initial point of contact for the SRMS (srmc@bto.org).
SRMS data	All records entrusted to the SRMS as data custodian and that we make available to others to further raptor conservation.

¹ NatureScot is the operating name of Scottish Natural Heritage.

3. Our Aims and Objectives

The Scottish Raptor Monitoring Scheme (SRMS) is a partnership of nine organisations each of which plays a key role in Scottish ornithology, notably with expertise in undertaking and reporting on scientifically rigorous monitoring of birds of prey. The SRMS aims to provide robust information on Scottish breeding raptor populations, in order to report on trends in numbers, distribution, survival and productivity and to understand the causes of population changes and constraints on raptor populations.

4. The data we hold

Currently the SRMS holds data from the 2003 breeding season onwards. Coverage of Scotland geographically and levels of coverage of species vary. Please note that the SRMS does not hold roost data, which in the context of raptors is usually most relevant to the non-breeding season.

The SRMS holds records for individual breeding attempts, showing occupancy and breeding outcomes.

4.1 Raptor datasets provided to the SRMS by SRMS partners

Data are largely provided to the SRMS by SRMS partner organisations, which includes (but is not limited to) the following datasets:

SRMS partner	Datasets which are routinely shared with SRMS
BTO	<ul style="list-style-type: none"> All Scottish breeding raptor data from the Nest Record Scheme. National SCARABBS data for UK breeding raptors where BTO is the lead survey partner (Peregrine).
FS	<ul style="list-style-type: none"> All breeding raptor data where FS has contracted monitoring due to SRMS data being unavailable.
FLS	<ul style="list-style-type: none"> All breeding raptor records stored on FLS's in-house GIS database.
NatureScot	<ul style="list-style-type: none"> All breeding raptor data where NatureScot has contracted monitoring due to SRMS data being unavailable. Schedule 1 licence returns will be shared with the SRMS via RBBP. National SCARABBS data for breeding raptors via the lead survey partner.
RBBP	<ul style="list-style-type: none"> Schedule 1 licence returns from individuals who are not members of SRSG. All breeding raptor records stored on RBBP's in-house GIS database from direct submissions to RBBP.
RSPB	<ul style="list-style-type: none"> All breeding raptor data from annual reserves monitoring. All breeding raptor data from monitoring undertaken outwith RSPB's reserve network. National SCARABBS data for breeding raptors where RSPB is the lead survey partner (Red Kite, Marsh Harrier, Golden Eagle, Hen Harrier, Merlin).
SRSG	<ul style="list-style-type: none"> All breeding raptor data from annual monitoring.

4.2 Raptor datasets provided to the SRMS by others

The SRMS also holds data received from individuals and other organisations. If you are interested in providing data to the SRMS so that it can be used to further raptor conservation (see section 8) then please contact the SRMC.

5. SRMS as data custodian

Data held by the SRMS is owned by the original data observers (or organisation in instances where the data have been collected by paid professionals), however, the SRMS is the data custodian. This role is performed by the SRMC (and supported by a BTO Scotland Research Ecologist) on behalf of the SRMG. The role of the custodian, on behalf of the data owners, is to:

- Collate and curate the database.
- Take all reasonable measures to prevent unauthorised access to, duplication of, or distribution of the raptor monitoring data while they have possession of these.
- Prepare datasets for use in specific analyses and reports.
- Maximise the efficiency of the database to facilitate access to service data sharing and requests.
- Make the raptor monitoring data available within the terms of this *Data Sharing & Use Policy* liaising with partners and the public over access to these data especially for data requests seeking data beyond what is publicly available via Atlas of Living Scotland.

6. Data Management

Data are submitted at the end of the breeding season with a submission deadline of 31 October each year. When data are received, they undergo a process of checking and archiving:

- The data submissions are filed electronically in the format received. Up to and including 2019 most data have been received on the standard SRMS spreadsheet but following the launch of SRMS Online (<https://app.bto.org/demography/srms/public/login.jsp>) in April 2020 the expectation is for an increasing number of submissions to be online going forward.
- A copy of each data submission is amalgamated with all other data received for that breeding season.
- The amalgamated dataset is checked for spatial errors and erroneous grid references corrected, where identified.
- The amalgamated dataset is checked for duplicate records.
- The amalgamated dataset is run through a cleaning programme. Data which are incomplete, incorrect, inaccurate and irrelevant are located then replaced, amended or removed to produce a final quality assured dataset fit for purpose. Cleaning ensures, for example, that observer, species, site names and codes and the habitat information are standardised. Incomplete or inaccurate information on occupancy

and nest contents are also intelligently populated, where this is feasible, based on information that has been provided².

- The cleaned version of the data is then added to the SRMS master dataset.
- A copy of the relevant subset of the cleaned version of the data is also sent to each original data provider for their records.
- A copy of the cleaned dataset is uploaded to [Atlas of Living Scotland](#) at resolutions that SRMG agree are appropriate for public viewing (see sections 6.1 and 7.2).
- A copy of the cleaned dataset is uploaded to the SRMS Legacy Data Portal to be available to SRMS partner organisations (see sections 6.2 and 8).

6.1 Administration of SRMS data on Atlas of Living Scotland

The SRMC will provide an annual update of the SRMS dataset to the Atlas of Living Scotland (AoLS) by the end of April which will include the data from the previous breeding season. As the majority of SRMS data relates to the location of breeding sites of rare and sensitive species, data are uploaded to AoLS at a 10 km resolution (10 km x 10 km square). These are distribution data only, i.e. presence in each grid square and not numbers or productivity data.

The SRMC is the primary point of contact for the [NBN Trust](#) and AoLS users and is responsible for administering the dataset on the AoLS which entails having access to online controls via the AoLS website. These online controls enable the setting of access levels to the dataset, responding to access requests from AoLS users and editing information relating to the dataset. The AoLS provides the SRMC with details of who has downloaded the data along with a detailed description of the purpose for which the data have been downloaded.

6.2 Administration of SRMS data on the SRMS Legacy Data Portal

The SRMC will provide an annual update of the SRMS dataset to the SRMS Legacy Data Portal by the end of April each year which will include the data from the previous breeding season. Through the online interface users can gain password-protected access to view and download SRMS data. The SRMS data are held on a secure BTO server.

7. Accessing SRMS data

7.1 Introduction

The most up to date data available from the SRMS will always be that from the previous breeding season. If data are sought for the current breeding season contact will be required with the relevant SRSG branch or other bodies that may hold additional information for the current season.

² Occupancy information will be upgraded based on the subsequent productivity information (e.g. where a raw record has occupancy captured as “single adult” but the productivity information indicates there was a nesting attempt, the cleaning programme upgrades the occupancy status to “adult pair”). Productivity information at various stages (egg, small chick, large chick and fledged young) will be upgraded based on subsequent stages (e.g. where a raw record has the number of eggs captured as “outcome unknown” (perhaps as a raptor worker was unable to check the nest contents at this stage) but another part of the record indicates that chicks were present on a subsequent visit then the cleaning programme upgrades the eggs to “Yes”).

Please note that as both geographic and species coverage across Scotland varies, the SRMS may not hold data or may only hold incomplete data for the geographical location and/or species relevant to enquiries.

7.2 Publicly available data

SRMS data are available to the public via the [Atlas of Living Scotland](#) (AoLS) at resolutions agreed by the SRMG (See section 6.1).

7.3 How to request more detailed access to SRMS data

If SRMS data which are publically available are not of a sufficient resolution for a specific purpose, requests to access more detailed information can be made either via the [Atlas of Living Scotland](#) or direct to the SRMC. Requests to access more detailed information from non-SRMS partners will be considered by the SRMG on a case-by-case basis. This includes contacting the original data provider to determine whether they are happy that data is supplied on their behalf for the requested purpose. SRMC will aim to process such data requests within 20 working days but please note that more complex requests (that may require more time to process) may take longer. A SRMS Data Request Form can be downloaded from the SRMS website (<http://raptormonitoring.org/srms-data/how-do-i-access-data-held-by-the-srms>).

Conservation professionals wishing to make a legitimate use of SRMS data on behalf of a SRMS partner organisation should refer to Section 8 for access rights and responsibilities. Requests from SRMS partners which could be considered either commercial uses or scientific research uses that will lead to publication in the public domain (see Section 8.2.2) will need to be referred to SRMG for consideration on a case-by-case basis as described for non-SRMS partners through the formal data request process described above.

7.4 Access restrictions

Access to all or part of some datasets may be restricted for the following reasons:

- If SRMG decide that the release of certain data is likely to put particularly sensitive species at risk. Making the data resources we hold available is designed to maximise the use of data for conservation management purposes.
- If the data provider has requested that certain data or information are withheld, for example, where data may be commercially sensitive, or where the data are under preparation prior to publication. In such cases the restriction may be permanent or temporary depending on the restrictions agreed with the data provider(s).
- If the data contain personal information. Information within the SRMS is managed in accordance with the Data Protection Act 2018 (See <http://www.legislation.gov.uk/ukpga/2018/12/enacted>). Personal information may be removed from the data resources that we make available. Please also consult our Privacy Statement (<http://raptormonitoring.org/srms-data/privacy-statement>).

7.5 Terms and Conditions of using SRMS data

Data providers have given SRMS permission to hold a copy of their data. All SRMS data are made available for use under the following SRMS Terms & Conditions.

- SRMS data should be stored securely with access limited to named individuals who are aware of the SRMS's Data Sharing & Use Policy.
- Any outputs produced using SRMS data must acknowledge their use. Use of SRMS data must be acknowledged in the following format when reproduced in internal or external documents and publications: **Data from the Scottish Raptor Monitoring Scheme.**
- SRMS data may not be shared with any other party without prior written consent from SRMG.
- SRMS data may not be sold to a third party or used within work for which there is a commercial gain, without prior written consent from SRMG.
- Other than SRMS products in the public domain, SRMS data may not be used for any scientific research likely to lead to publication without prior written consent from the SRMG.
- Where the use of detailed locational data (i.e. 100m resolution or higher) have been conferred through this policy, any outputs containing detailed locational data must be treated confidentially and must not enter the public domain unless agreed in writing with SRMG.

7.6 Liaison with data providers

Many data providers have considerable expertise on raptors and local knowledge which may be pertinent to data requests. While we encourage you to request access to SRMS data through the ways described in sections 7.2 and 7.3 we would also strongly advocate liaising with the data providers who may be able to assist with interpretation and be able to offer specific advice in relation to your request. The SRMC will be happy to provide you with relevant contact information where our providers have indicated they are happy to be contacted in this way. Contact information for some data providers is available on the SRMS website (

<http://raptormonitoring.org/srms-data/data-sharing-use-policy/1-2-a-note-for-data-users/srms-data-provider-contacts>).

7.7 Charges

Where agreed with data providers, SRMS data will be made available free-of charge to SRMS partner organisations and, wherever possible, to other users wishing to use the data for purposes which the SRMG considers to be contributing to the aims and objectives of the SRMS (provided that processing requests are not unduly time-consuming). Charges may apply for commercial uses, and in such cases detailed data requests for commercial purposes will be referred to the relevant data partner.

8. How SRMS data are used

8.1 Use of SRMS data by the SRMS and SRMG

The SRMS uses the data for core SRMS work which includes any work agreed by SRMS partners in the SRMS Annual Work Plan (see <http://raptormonitoring.org/about-the-srms/work-programme>). Routine uses of SRMS data include (but are not limited to):

- reporting on regional and national trends in numbers and productivity published in an annual report and made available on the SRMS website – raptormonitoring.org.
- analysis and reporting of patterns of breeding success and causes of breeding failures.

8.2 Use of SRMS data by SRMS partners

SRMS partners use the data to benefit raptors, at a local, regional, national and even international level.

8.2.1 The purposes for which SRMS data can be used by SRMS partners

Where appropriate, SRMS seeks to ensure that detailed information (i.e. 100m resolution) is made available to those in the statutory and voluntary conservation organisations who need such data to ensure that species and sites are adequately protected from development or other threats. SRMS partner organisations use the SRMS data to support a range of conservation uses, including development of effective conservation policy, assessment and reporting of the conservation status of raptor populations for international conservation obligations and national designated sites, planning of national surveys of raptors, production of responses to human developments and threats and provision of information to help combat wildlife crime, for example. The terms and conditions governing the use of SRMS data by SRMS partners is detailed below.

Below is a list of routine conservation uses which SRMS data can be used for by the named SRMS partner organisations.

SRMS partner	Agreed purposes for which SRMS data can be used by each partner
BTO	<ul style="list-style-type: none"> • To contribute to the Nest Record Scheme to enhance the production of UK-wide trends in the breeding performance of raptors which are published in the <i>BirdTrends</i> report. • To plan national surveys for raptors (e.g. as part of the SCARABBS programme).
FS	<ul style="list-style-type: none"> • To protect raptors from disturbance by forest management activities such as tree felling and track construction, and from other activities such as formal and informal recreation. • To screen the potential impact of planting proposals before they are submitted to FS for approval for grant support. • To determine the requirement for an EIA assessment associated with a forest operation. • To monitor trends in raptor success associated with forest operations approved and grant aided under SRDP.
FLS	<ul style="list-style-type: none"> • To protect raptors from disturbance by forest management activities such as tree felling and track construction, and from other activities such as formal and informal recreation.

JNCC	<ul style="list-style-type: none"> • UK-scale national reporting. • Assessment of species status within statutorily designated sites of international importance (on behalf of NatureScot).
NatureScot	<ul style="list-style-type: none"> • SRMS data may be used by NatureScot (or those working directly on their behalf) for the purposes of fulfilling its statutory nature conservation functions with respect to raptors including: <ul style="list-style-type: none"> • To establish protected areas. • To contribute to NatureScot Site Condition Monitoring. • To identify areas where targeted conservation action should be directed by NatureScot for species conservation (e.g. informing management decisions and management planning on designated sites). • To inform responses to development control casework. • To update sensitivity maps for developments (e.g. onshore windfarms). • To plan national surveys for raptors (e.g. as part of the SCARABBS programme). • To understand the causes of population change and limitation in raptors. • To support the development and implementation of policy and action for raptors. • For national reporting on Annex 1 species (e.g. as required under Article 12 of the EU Birds Directive and the Convention on Migratory Species' Memorandum of Understanding on the conservation of migratory raptors). • For reporting on monitoring activity (that may disturb birds listed on Schedule 1 of the Wildlife & Countryside Act) undertaken under license.
RBBP	<ul style="list-style-type: none"> • To maintain the UK's definitive archive of rare breeding bird data. In the context of breeding raptors, data will be provided for those raptor species which feature on RBBPs species list, currently Honey-buzzard, White-tailed Eagle, Marsh Harrier, Hen Harrier, Goshawk, Golden Eagle, Osprey, Merlin, Hobby, Peregrine.
RSPB	<ul style="list-style-type: none"> • To inform responses to development control casework. • To plan regional and national surveys for raptors (e.g. as part of the SCARABBS programme). • To update sensitivity maps for developments (e.g. onshore windfarms). • To inform Investigations Team work to help prevent wildlife crime. Data will at times be required to form part of intelligence packages provided to the police or National Wildlife Crime Unit.
SOC	<ul style="list-style-type: none"> • To plan surveys of raptors locally or nationally (in liaison with other partners) • For the purposes of compiling a national Scottish Bird Report • For the purposes of supplying summaries for inclusion in local bird reports
SRSG	<ul style="list-style-type: none"> • To further its knowledge of status, distribution and breeding success of raptors in Scotland. • To organise monitoring coverage. • SRSG are also encouraged to use its own data that has been processed by the SRMS (see section 6) to satisfy any commercial requests for data. However, SRSG may not sell any SRMS data originating from a non-SRSG

	source to a third party or use it within work for which there is a commercial gain or for research publications without approval of the data owner.
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8.2.2 The purposes for which SRMS data cannot be routinely used by SRMS partners

Any uses of data which are not covered in section 8.2 require specific approval from SRMG. Any doubts or queries as to whether a planned use falls beyond that covered in section 8.2 should be clarified through consultation with SRMG (initial contact should be the SRMC).

There are some specific uses that SRMS partners may not make of SRMS data (where that partner is not the originating source) without further consultation with SRMG. These include:

- Commercial uses.
- Scientific research uses that will lead to publication in the public domain.

For both of these uses, it is essential to make a formal specific data request and the SRMS will revert back to the original data providers to discuss how to proceed.

8.2.3 How access to SRMS data by SRMS partners will be managed

SRMS data is accessible to statutory bodies through a secure online interface – the SRMS Legacy Data Portal (<https://app.bto.org/srms-legacy/>). The SRMS data are held on a secure server administered by BTO.

RBBP and RSPB are able to download a copy of the SRMS data from the SRMS Legacy Data Portal periodically and host a copy on their in-house GIS systems.

Internal approval of access to these data within each SRMS partner organisation is controlled by a named individual within each organisation appointed by the relevant SRMG representative from the SRMS partner organisation.

SRMS partner	Named individual responsible for governing internal access to SRMS data within their organisation
BTO	Associate Director – Chris Wernham
FS	Biodiversity Policy Lead – Colin Edwards
FLS	Species Ecologist – Kenny Kortland
JNCC	Senior Ornithologist – Danny Heptinstall
NatureScot	Ornithology Adviser – Andrew Stevenson
RBBP	Secretary – Mark Eaton
RSPB	Investigations Intelligence Officer – Robin Lyon Sinclair
SOC	SOC Birding Officer – Stuart Rivers
SRSG	Chair of North-east Scotland branch – Ewan Weston

This means that access is only be granted to those with a business need for using these data and in accordance with the own organisations policies over access to sensitive information.

For terms and conditions governing the use of all SRMS data please refer to Section 7.5.

8.2.4 Review of SRMS partner use of SRMS data

Each SRMS partner is required to report back at the end of April each year on the purposes to which SRMS data have been put within their organisation. A SRMG representative will provide an annual report to the SRMG. SRMG will review the uses and ensure that all have been compliant with this Data Sharing & Use Policy.

8.3 Use of SRMS data by the National Wildlife Crime Unit

SRMS data may be passed to a competent authority under Part 3 of the Data Protection Act 2018 (DPA 2018) for law enforcement purposes which includes the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security. A 'competent authority' is defined under Part 3 (30) and Schedule 7 of the DPA 2018, and includes UK police forces and the UK National Wildlife Crime Unit (NWCU).

The NWCU is a national police unit that provides support to all police forces and law enforcement agencies across the UK and internationally. The unit comprises an intelligence and analytical function whilst also providing direct operational support via an investigative support function. It is fully compliant to working police protocols and conventions regarding intelligence. The unit's role is to support investigations, providing a start to finish support service for Police Wildlife Crime Officers based in all UK forces.

Personal information collected at NWCU is managed in accordance with the following legislation and policy:

- The Data Protection Act 2018
- The Human Rights Act 1998
- Freedom of Information Act 2000
- Computer Misuse Act 1990
- Government Security Classification Policy
- Statutory Code of Practice for the Management of Police Information.

Reference will also be made to relevant case law and to legal guidance and codes of practice issued by the Office of the Information Commissioner.

Any data used for a law enforcement purpose by a competent authority under Part 3 of the DPA 2018 will comply with the six data protection principles as set out in Part 3, Chapter 2 (35(1) – 40) of the DPA 2018 as follows:

- The processing of personal data for any of the law enforcement purposes must be lawful and fair.
- Personal data collected on any occasion must be specified, explicit and legitimate, and must not be processed in a manner that is incompatible with the purpose for which it was collected.
- Personal data processed for any of the law enforcement purposes must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

- Personal data processed for any of the law enforcement purposes must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the law enforcement purpose for which it is processed, is erased or rectified without delay.
- Any personal data processed for any of the law enforcement purposes must be kept for no longer than is necessary for the purpose for which it is processed.
- Personal data processed for any of the law enforcement purposes must be so processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, “appropriate security” includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Any SRMS data passed to the NWCUC may be shared with other law enforcement agencies for the purposes as described in Part 3 of the DPA 2018, complying with data protection principles as presented above using information management guidance set out in the National Intelligence Model (NIM) and the Management of Police Information (MoPI) policy documents.

Any processing carried out by police or a competent authority which is not for the primary purpose of law enforcement will be covered by the general processing regime under Part 2 of the DPA 2018.

9. Policy review

The policy will be reviewed by SRMG annually and revisions to this policy can be made with the agreement of all partners.

In the event that the SRMS terminated then SRMG would do its utmost to repatriate records to the data owners or to find an alternative mutually agreeable home for the records.