

The Convener  
Justice Committee  
The Scottish Parliament  
Edinburgh  
EH99 1SP

By email

7 December 2018

Dear Convener

### **Police Scotland's interim Vulnerable Persons Database**

Thank you for your letter of 22 November concerning the interim Vulnerable Persons Database (iVPD).

Police Scotland contacted the Information Commissioner's Office (ICO) in September 2017 upon realising that the iVPD did not comply with data protection requirements relating to retention of personal data. At that time, we advised that retention and weeding rules were required and should be kept under review after implementation. We also advised that individuals must be informed that a record of the incident would be retained by Police Scotland and for how long. We also queried whether individuals who presented no cause for concern should have been added to the iVPD at all.

Since then, we have been in regular contact with Police Scotland and received updates on progress towards improved compliance. We have also discussed other matters that have arisen, including those resulting from the change in data protection law in May 2018.

In October 2018, we received a data protection impact assessment (DPIA) from Police Scotland relating to their collection and sharing of personal information with partner agencies. We are currently reviewing the DPIA and will be seeking some further information from Police Scotland shortly, after which, more detailed advice will be given.

We will continue to monitor developments and engage with Police Scotland as necessary until the appropriate changes are made.



Yours sincerely

**Ken Macdonald**  
**Head of ICO Regions**