

**Equality and Human Rights Impact Assessment (EqHRIA)**

**Summary of Results**

### Policy/Practice Name:

Interim Vulnerable Persons Database Rules, Conventions and Data Input Standards National Guidance

### Owning Department:

Specialist Crime Division - Public Protection – National Risk and Concern

### Date EqHRIA Completed:

23/02/2022

### Purpose of Policy/Practice:

The purpose of the interim Vulnerable Persons Database (iVPD) reflects the main purposes of policing and enables the police to improve the safety and wellbeing of people and communities across Scotland. This is achieved by promoting measures to prevent crime, harm and disorder. The database also allows police to record contact with individuals who may be experiencing adversity and/or vulnerability.

Policing must continue to evolve to meet the new and emerging needs of those in our communities. This is never more relevant than in the growing number of individuals who experience situational vulnerabilities due to a number of differing and/or collective factors that impact on their wellbeing and at times puts them at significant risk of harm. The Police and Fire Reform (Scotland) Act 2012 also creates a statutory requirement for the police to support those individuals.

To discharge this duty, iVPD contains concern reports relating to children and adults, which are shared with external statutory and non-statutory partners where deemed necessary and proportionate, with the primary purpose of achieving improved outcomes for all.

### Summary of Analysis / Decisions:

**What the assessment found, and actions already taken.**

In preparation for the release of the version 9.00 upgrade to iVPD, the opportunity was taken to update the iVPD Rules, Conventions and Data Input Standards Guidance document to reflect the forthcoming improvements brought about by the upgrade, alongside already existing changes as result of evolving business processes and the introduction of Age of Criminal Responsibility (Scotland) Act 2019.

Officers and staff were also provided with additional guidance material to support the release of the upgrade and a revised iVPD Data Protection Impact Assessment (DPIA) was produced to reflect the system based functional updates.

The existing iVPD EqHRIA was reviewed.

The main findings were positive for all of the protected characteristics with the purpose of improving the safety and wellbeing of all persons, localities and communities of Scotland. The biggest impact was found to be in regards to Age and Disability. For Age the impact was assessed for both younger and older age ranges as age might increase a person’s vulnerability whether they are a child or an older person. For Disability it was found that the recording of a disability would assist in determining the services available and which partner agencies might be most suitable for sharing information with. Each case will be risk assessed and the rationale for decision making, to either share information or indeed the decision not to share information, will be accurately recorded.

Human Rights articles 2, 3, 4 and 8 were found to be protected due to early and effective intervention strategies being applied and effective working with third sector agencies and partners to safeguard and protect individuals. Article 8 recorded an infringement as with the sharing of personal information there is potential to infringe a person’s right to privacy. As a rigorous structured assessment is conducted throughout the detailed and in-depth decision making process for iVPD it was assessed that such infringement would be minimised as it would be a necessary, proportionate, justified and a legitimate reason for any sharing of information.

### Summary of Mitigation Actions:

**What the assessment found, and actions already taken.**

Police Scotland’s National Risk and Concern (NRAC) provides national oversight and business governance of iVPD. It monitors the application of the system, ensuring that its use is in keeping with force policy, data standards and legislative frameworks. NRAC also regularly consults internally with Concern Hubs, and externally with statutory and non-statutory partners to maintain information sharing effectiveness and identify any issues that may evolve.

Concern Hub staff undergo bespoke training in terms of Concern Hub duties as well as iVPD e-learning modules which are mandatory for all Police Scotland staff.

Training has been cascaded to Concern Hub staff on General Data Protection Regulation (GDPR) and the Data Protection Act 2018.