



Department for
Communities and
Local Government

Policy on protecting personal and other sensitive information in fire and rescue incident and casualty data

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Scope

Fire and Rescue Services across Great Britain record details of all incidents attended and of casualties. A national data base is populated from these and this contains details as described in the document *Incident Recording System Questions and Lists* ->

www.communities.gov.uk/fire/researchandstatistics/firestatistics/newincidentrecording/. This includes information collected at the scene typically from the occupant of the building. This is personal information and so must be protected appropriately. It typically relates to the characteristics of individuals and households.

The purpose of this policy is to provide an overview of how the need to protect personal and other sensitive information gives rise to some limitations to both:

- i) **statistics** that can be published¹ relating to fire and rescue incidents and in particular casualties, and
- ii) the extent of **access** that can be granted to **record-level** fire and rescue incident and casualty data

Both are covered in this document since there is much in common in the principles and considerations of the data items that need to be protected.

Introduction

In order to protect personal or sensitive details, the risk of disclosure must be actively managed by each guardian of the data.

Disclosure of personal or sensitive information would occur if it were both possible to i) identify an incident or casualty, including by combination with other sources of information, and ii) it was also possible to deduce any personal or sensitive information, including any information provided by eg the occupant of a building attended by the fire and rescue service (see second half of the table below for examples of sensitive data fields).

In statistical outputs, it is possible to make the risk of disclosure negligible, albeit that this may require that some outputs are not available.

In giving access to record-level data, even after removing attributes that would be likely to allow identification, there is typically a small residual risk of identification. In these cases, the benefits (the public good) have to be weighed up against risk of disclosure of information that is to be protected (eg personal or other sensitive information). It is also instructive to consider the risks or missed opportunity if access to information were not to be provided due to data protection (eg risks were very small, and if no access were granted, even under strict access conditions, to information that could make an important

¹ The UK Statistics Authority Code of Practice states "Ensure that arrangements for confidentiality protection are sufficient to protect the privacy of individual information, but not so restrictive as to limit unduly the practical utility of official statistics. Publish details of such arrangements."

contribution to public safety). With some information, any risk of disclosure will be unacceptable, whereas in other cases, eg if the information about a person or incident that might be deducible is unlikely to cause distress or loss, then this risk may on balance be acceptable if there is a sufficiently strong specific benefit for the information being available, with appropriate access conditions and safeguards. All these considerations must be guided by the appropriate legislation eg the Data Protection Act, by guidance eg from the Information Commissioner², and by best practice from across the Government Statistical Service.

How potentially sensitive details among fire and rescue incident and casualty data are protected

Risk of disclosure is addressed as follows:

For statistical outputs:

Outputs are reviewed, particularly where cell values are small. Where they are, outputs are redesigned by grouping categories and/or suppressing values.

It is worth noting that small numbers in cells in output tables are not always a disclosure risk. For example, numbers of fire fatalities have long been published by fire and rescue authority area. These data are typically single figure values. Moreover, cell values are commonly zero and one. While an individual can nominally be pinpointed from within the data, for example with information from a press report, the only information that could be deduced from these simple counts would be that a known fatality must have been the *only* fatality in that geographical area in that time period. This is not personal information and the risk of distress or loss or disclosure of such an insight is negligible. It is important to note that this is only true of very basic counts of casualties, and may not hold if the data output included other details such as personal or household characteristics.

For record-level data sets: the Data Protection Act requires not only that access meets certain requirements³, but also that access is only provided to those fields which can be demonstrated to be needed for the proposed purpose. Therefore, where any casualty details or where any information about dwellings or other buildings is involved, sensitivity and

² eg http://www.ico.gov.uk/for_organisations/data_protection/topic_guides/data_sharing.aspx

³ Access to data that includes personal or other potential sensitive information with a non-negligible risk of identification can only be arranged for projects where there the public good/benefit outweighs risks and costs, where the data requested for the project can be verified as being needed for the project's aims, and where the applicants that can demonstrate the required knowledge and they can arrange for their organisation to sign up to appropriate access conditions. Such access is subject to signing up to a detailed data access agreement by senior officials. The agreement specifies responsibilities and requirements including that the data is accessed and held only for a specified period of time. The individuals who are to have access to the data are also required to be familiar with principles of risks of disclosure, and to confirm that they have studied documents including the National Statistician's Guidance on Confidentiality of Official Statistics (<http://www.statisticsauthority.gov.uk/national-statistician/ns-reports--reviews-and-guidance/national-statistician-s-guidance/confidentiality-of-official-statistics.pdf>)

disclosure risk is considered for each field in the context of each individual request for access to record-level data.

Whole records are excluded for some incident types (eg explosions or where an incident may have national security considerations). Some fields are excluded or subject to groupings, such as the examples of details noted below.

Action taken to protect personal or other sensitive information for:
Statistical outputs Record-level data sets

Data fields that are at particular risk of enabling identification:

Casualty name Incident location/address Vehicle registration or identification number	Not part of statistical outputs	Highly identifiable. Thus to be removed unless there is a strong public good and under stringent data access conditions.
Geographical area	Statistics are provided for ranges so that cell sizes are not too small. In practice, care is needed for sub-England/GB figures.	Often identifiable in combination with other details of an incident, and in combination with local press reports. Thus removed unless there is a strong public good and under stringent data access conditions.
Casualty age (Q9.7)	If sensitive personal or household information categories are involved, statistics are provided for ranges so that cell sizes are not too small.	If access conditions provide adequate safeguard then group into few categories: eg under 18, 18-64 and 65+. Else remove.
Casualty ethnicity (Q9.9)	Broad groups eg White, Black, Asian, other are used provided this does not give numbers that are small. If this is insufficient, then it is not possible to provide outputs on this field.	Ethnicity is noted as being a particularly sensitive field under Data Protection Act guidance. Thus it is removed unless there is both a strong public good and stringent data access conditions in place.
Gender (Q9.8) – May make more likely to be identifiable in combination with other details such as above.		
Age band of perpetrator (Q8.3)	Analysis would be provided only where cell sizes are not small	Excluded unless there is a strong public good and under stringent data access conditions.

Examples of other information that is personal or sensitive, thus for which

disclosure must be guarded against

Role that victim played (Q9.12) (eg resident, employee, visitor)	Analysis would be provided only where cell sizes are not small, except for numbers of firefighter casualties.	Excluded unless there is a strong public good and under stringent data access conditions.
Cause of rapid growth (Q 8.8) (explosives categories)	Unlikely to be able to provide outputs because cell sizes are likely to be small	Categories of fireworks, ammunition, chemicals grouped in with 'other'.
Categories within deliberate fires (own/other's property)	Unlikely to be able to provide outputs because cell sizes are likely to be small	Categories are grouped together into a single 'deliberate' field
Nature of injury of fatality (Q9.22) Circumstances of injury of fatality (Q9.25) eg immobility, or under influence of drink or alcohol (also Q8.17) What was the Household composition at Type at the time of the incident? (Q8.15) Human factors contributing to fire (Q8.16) Some non-fire incident types (Q3.3) Whether the property was normally occupied at the time of incident (Q5.14)	Analysis would only be provided where cell sizes are not small	Include only if access conditions provide adequate safeguard