

# OFFICIAL

## Bulk Personal Data Acquisition Retention (BPDAR) form January 2016 to present

### Bulk Personal Dataset: Record form

Please read the [Notes for Guidance](#) (insert link here) as you complete this form

Fields will expand as you type

Dataset name	<input type="text"/>
BPD ref. no.	<< <u>Relevant Team</u> to allocate>>
Current Endorser ( <u>relevant senior official</u> )	<input type="text"/>  Role: the endorser is <u>accountable</u> for the dataset while it is in GCHQ's possession and is <u>responsible</u> for ensuring that all aspects of the dataset's life-cycle are managed appropriately.
Current Requester	<input type="text"/>  Role: the requester is typically the analyst who will use the dataset operationally and has first-hand knowledge of its value to the mission.

#### 1. Information about the dataset

##### General description of dataset

Brief description of data
Source of dataset
Classification, other protective marking, ECI/COI (if applicable)
Other handling instructions imposed by source

##### Plans for Acquisition and Disposal

Definitive answers may not be possible – give as much information as you can about what you expect to happen.

##### Initial acquisition of dataset

Does GCHQ have the data? YES / NO
If yes, when was it received?
If yes, how and where is it held now?

OFFICIAL

# OFFICIAL

If no, when and how do you expect to receive it?
--

## Further acquisition of data

Is this a one-off acquisition?	YES / NO
If no, how frequently will further data be acquired?	
By what method?	
Will further acquisition replace or add to the existing dataset?	

## Deletion / disposal of dataset

Is dataset being acquired for a specific, time-bounded purpose?	YES / NO
If yes, when will dataset be deleted?	
If no, how long do you anticipate data will remain of value?	Whole dataset?
	Individual data items?
Deletion regime?	

OFFICIAL

# OFFICIAL

## Details of dataset

The purpose of this section is to enable the relevant team to determine:

- (i) how intrusive the data is;
- (ii) how sensitive it is that GCHQ has it and is using it for intelligence purposes.

Intrusiveness and sensitivity will be assessed by the relevant team and recorded in the "Authorisation to Acquire" section below.

Approximate size of dataset
-----------------------------

Does this dataset contain any of the following personal information?

(Yes, No, Not Known yet – Y, N, N/K)

Personal details (e.g. DoB, nationality, address, phone no., email address, etc.)
Passport, identity card numbers
Bank account, credit card details

Financial transaction details
Other (please specify below)

Does this dataset contain any of the following sensitive personal information?

(Yes, No, Not Known yet – Y, N, N/K)

Racial or ethnic origin
Political opinions
Religious, or similar, beliefs
Membership of a trade union
Physical or mental health
Sexual life
Commission or alleged commission of any offence
Legal proceedings and their outcomes, including sentencing
Any other personal information that appears similarly sensitive – please specify below

# OFFICIAL

What proportion of the data (High, Medium, Low, Zero, Not Known – H, M, L, 0, N/K) relates to...

...people of no probable intelligence interest?
...UK nationals?
... <u>Foreign Partner</u> nationals?
...children/minors?

Will any of the above data be removed before the dataset is made available to analysts? If so, which?
---

# OFFICIAL

## 2. Acquisition

### Legal Adviser endorsement

I confirm that all legal criteria for the dataset's acquisition have been satisfied.		
Name:	Position:	Date:

LA Comment (if applicable)
----------------------------

### Initial justification to acquire

Intelligence case to justify GCHQ's acquisition of this dataset, including how it relates to GCHQ's statutory and mission purposes – see notes for completion <<link when available>>
---

Could the dataset have been acquired by other means?
--

Who will have access to the BPD?
----------------------------------

Is the BPD likely to include confidential comms (e.g. Legal Professional Privilege (LPP), journalistic sources or spiritual/religious counselling)?
---

What are the plans for exploitation of this dataset?
--

Intelligence case completed by		
Name:	Position:	Date:

# OFFICIAL

Endorsed by		
Name:	Position:	Date:

## Authorisation to acquire

Authoriser to select and delete one entire blue box, as applicable, then complete remaining pink fields. Copy & paste ✓ into appropriate boxes.

<b>Approve</b>									
Authoriser's assessment (High, Medium, Low – H, M, L) of dataset's	<table border="1"><tr><td>Intrusiveness</td><td></td></tr><tr><td>Sensitivity</td><td></td></tr></table>	Intrusiveness		Sensitivity					
Intrusiveness									
Sensitivity									
This Bulk Personal Dataset should be treated as (tick one)	<table border="1"><tr><td>Targeted</td><td></td></tr><tr><td>Non-targeted</td><td></td></tr></table>	Targeted		Non-targeted					
Targeted									
Non-targeted									
I am satisfied that acquisition of this dataset is necessary and proportionate in relation to one or more of GCHQ's authorised purposes.									
I authorise acquisition of this Bulk Personal Dataset by GCHQ, subject to any conditions or restrictions noted in the "Authoriser's comments" section below.									
The justification for its continued retention must be reviewed approximately... (tick one or complete 3 <sup>rd</sup> box)									
<table border="1"><tr><td>6 months after acquisition i.e. at the <u>next</u> meeting of the BPD Retention Review Panel</td><td></td></tr><tr><td>12 months after acquisition i.e. at the <u>next-but-one</u> meeting of the BPD Retention Review Panel</td><td></td></tr><tr><td>24 months after acquisition i.e. the maximum period of time allowed under GCHQ's Closed Handling Arrangements for BPD</td><td></td></tr><tr><td>...in _____ months' time, for the following reasons:</td><td></td></tr></table>		6 months after acquisition i.e. at the <u>next</u> meeting of the BPD Retention Review Panel		12 months after acquisition i.e. at the <u>next-but-one</u> meeting of the BPD Retention Review Panel		24 months after acquisition i.e. the maximum period of time allowed under GCHQ's Closed Handling Arrangements for BPD		...in _____ months' time, for the following reasons:	
6 months after acquisition i.e. at the <u>next</u> meeting of the BPD Retention Review Panel									
12 months after acquisition i.e. at the <u>next-but-one</u> meeting of the BPD Retention Review Panel									
24 months after acquisition i.e. the maximum period of time allowed under GCHQ's Closed Handling Arrangements for BPD									
...in _____ months' time, for the following reasons:									

# OFFICIAL

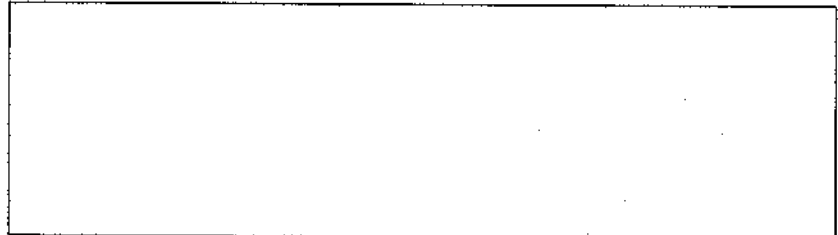
## Reject

I do not consider that an adequate case has been made to justify GCHQ's possession of this data.

If the data is already in GCHQ's possession, all copies must be deleted from GCHQ systems and removable media as soon as possible. Confirmation that this has been done must be sent to xxxxxxxxxx [redacted]

## Authoriser's comments

Signature of  
authorising officer  
(copy & paste .jpg of  
signature into box)



Name:	Position:	Date:
-------	-----------	-------

# OFFICIAL

### 3. Experimental Use

To be completed only if it is proposed to use some or all of this dataset for an experimental purpose.

#### Justification for experimental use of dataset

Description of proposed experimental use

Intelligence case to justify experimental use

Intelligence case completed by

Name:

Position:

Date:

Endorsed by

Name:

Position:

Date:

#### Authorisation of experimental use

Authoriser to select and delete one entire blue box, as applicable, then complete remaining pink fields.

##### Approve

I have considered the risks associated with the proposed experimental use of this dataset. I am satisfied that it is an appropriate use of this dataset and that it is necessary and proportionate in relation to one or more of GCHQ's authorised purposes.

I authorise use of this dataset for this purpose, subject to any conditions or restrictions noted below.

##### Reject

I have considered the risks associated with the proposed experimental use of this dataset. I do not consider that an adequate case has been made to justify using this dataset for this purpose, for the reasons given below.

Authoriser's comments



# OFFICIAL

--

**Signature of  
authorising officer**  
*(copy & paste .jpg of  
signature into box)*

--

<b>Name:</b>	<b>Position:</b>	<b>Date:</b>
--------------	------------------	--------------

# OFFICIAL

## 4. Disclosure

To be completed only if it is proposed to share some or all of this dataset with an external organisation other than that which provided the data to GCHQ in the first place. This does not include intelligence Reporting.

### Justification for disclosure

What data will be shared, with whom and how?

Intelligence case for sharing

Intelligence case completed by

Name:

Position:

Date:

Endorsed by

Name:

Position:

Date:

### Authorisation to share

Authoriser to select and delete one entire blue box, as applicable, then complete remaining pink fields.

#### Approve

I am satisfied that sharing of this dataset, as described above, is justified in terms of necessity and proportionality.

I authorise this sharing, subject to any conditions or restrictions noted in the "Authoriser's comments" section below.

#### Reject

I do not consider that an adequate case has been made to justify sharing this data, for the reasons given below.

# OFFICIAL

**Authoriser's comments**

**Signature of  
authorising officer**  
*(copy & paste .jpg of  
signature into box)*

**Name:**

**Position:**

**Date:**

# OFFICIAL

## 5. Continued Retention

**Justification to retain – submission to** <<Month YYYY>> **Review Panel**

If, in the Endorser's view, continued retention cannot be justified, make a brief note to this effect in the 'Intelligence case' box and proceed to the 'Final disposal of dataset' section below.

Intelligence case to justify GCHQ's continued retention and use of this data

Intelligence case completed by

Name:

Position:

Date:

Endorsed by

Name:

Position:

Date:

### Authorisation to retain

Authoriser to select and delete one entire blue box, as applicable, then complete remaining pink fields. Copy & paste ✓ into appropriate box.

#### Approve

I am satisfied that continued retention of this dataset is necessary and proportionate in relation to one or more of GCHQ's authorised purposes. I confirm that the assessment of Intrusiveness and Sensitivity remains the same.

I authorise continued retention of this Bulk Personal Dataset by GCHQ, subject to any conditions or restrictions noted in the "Authoriser's comments" section below.

The justification for its continued retention must be reviewed in approximately...  
(tick one or complete 3<sup>rd</sup> box)

<input type="checkbox"/>	<b>6 months after acquisition</b> i.e. at the <u>next</u> meeting of the BPD Retention Review Panel	<input type="checkbox"/>
<input type="checkbox"/>	<b>12 months after acquisition</b> i.e. at the <u>next-but-one</u> meeting of the BPD Retention Review Panel	<input type="checkbox"/>
<input type="checkbox"/>	...in _____ months' time, for the following reasons:	

# OFFICIAL

## Reject

I do not consider that an adequate case has been made to justify GCHQ's continued possession and use of this data.

All copies of the data must be deleted from GCHQ systems and removable media as soon as possible.

The final section of this form must be completed and confirmation that this has been done sent to

xxxxxxxxxx [redacted]

by the Endorser.

Authoriser's comments

Signature of authorising officer,

on behalf of the

Retention Review Panel

(copy & paste .jpg of  
signature into box)

Name:	Position:	Date:
-------	-----------	-------

# OFFICIAL

## 6. Template for subsequent Continued Retention requests

For each subsequent retention request, copy everything between the blue lines and paste it above (after the previous "Back to top" link), leaving these blank templates for future use...

Justification to retain – submission to <<Month yyyy>> Review Panel

If, in the view of the Data Sponsor, continued retention cannot be justified, make a brief note to this effect in the 'Intelligence case' box and proceed to the 'Final disposal of dataset' section below.

Intelligence case to justify GCHQ's continued possession of this data

Intelligence case completed by

Name:

Position:

Date:

Endorsed by

Name:

Position:

Date:

## Authorisation to retain

Authoriser to select and delete one entire blue box, as applicable, then complete remaining pink fields. Copy & paste ✓ into appropriate box.

# OFFICIAL

## Approve

I am satisfied that continued retention of this dataset is necessary and proportionate in relation to one or more of GCHQ's authorised purposes. I confirm that the assessment of Intrusiveness and Sensitivity remains the same.

I authorise continued retention of this Bulk Personal Dataset by GCHQ, subject to any conditions or restrictions noted in the "Authoriser's comments" section below.

The justification for its continued retention must be reviewed in approximately...  
(tick one or complete 3<sup>rd</sup> box)

<input type="checkbox"/>	<b>6 months after acquisition</b> i.e. at the <u>next</u> meeting of the BPD Retention Review Panel	<input type="checkbox"/>
<input type="checkbox"/>	<b>12 months after acquisition</b> i.e. at the <u>next-but-one</u> meeting of the BPD Retention Review Panel	<input type="checkbox"/>
<input type="checkbox"/>	...in _____ months' time, for the following reasons:	

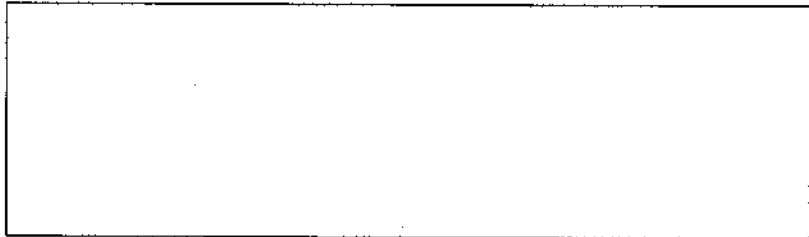
## Reject

I do not consider that an adequate case has been made to justify GCHQ's continued possession and use of this data.

All copies of the data must be deleted from GCHQ systems and removable media as soon as possible.  
Confirmation that this has been done must be sent to xxxxxxxxxx [redacted]

Authoriser's comments

Signature of authorising officer,  
on behalf of the  
Retention Review Panel  
(copy & paste .jpg of  
signature into box)


--

# OFFICIAL

<b>Name:</b>	<b>Position:</b>	<b>Date:</b>
--------------	------------------	--------------

**7. Final disposal of dataset**

To be completed by the Endorser when GCHQ *finally* relinquishes interest in this dataset.

Complete one of these tables, as applicable:

<p style="text-align: center;"><b>If GCHQ's acquisition of this dataset was authorised by <u>the relevant team</u> but data was never in fact received, date on which approval to acquire expired or was terminated</b></p>	Date or N/A	
<p>As Endorser, I confirm that GCHQ no longer has an interest in acquiring this dataset</p> <p style="text-align: center;"><i>(copy &amp; paste .jpg of signature into box)</i></p>		
<b>Name:</b>	<b>Position:</b>	<b>Date:</b>

<p style="text-align: center;"><b>If GCHQ's acquisition of this dataset was authorised by <u>the relevant team</u> and data was received but never in fact exploited (perhaps for technical reasons), date on which authorisation to retain expired or was terminated</b></p>	Date or N/A	
<p>As Endorser, I confirm that all copies of this personal data have been deleted and any removable media properly disposed of</p> <p style="text-align: center;"><i>(copy &amp; paste .jpg of signature into box)</i></p>		
<b>Name:</b>	<b>Position:</b>	<b>Date:</b>

<p style="text-align: center;"><b>If this dataset has been exploited for intelligence purposes but <u>its retention by GCHQ can no longer be justified</u>, date on which authorisation to retain expired or was terminated</b></p>	Date or N/A
---	-------------



# OFFICIAL

<p>As Endorser, I confirm that all copies of this personal data have been deleted and any removable media properly disposed of <i>(copy &amp; paste .jpg of signature into box)</i></p>		
Name:	Position:	Date:

