



Ashford Partnership Against Crime

Ashford Partnership Against Crime Ltd
c/o The Community Safety Unit
Police Station
Ashford
TN23 1BT
Tel: 07513 633050
Email: admin@apac-kent.co.uk

ASHFORD PARTNERSHIP AGAINST CRIME Ltd

PRIVACY NOTICE – OFFENDERS AND MEMBERS OF THE PUBLIC

This statement confirms the purpose of Ashford Partnership Against Crime Ltd Business Crime Reduction Partnership and explains why Ashford Partnership Against Crime Ltd processes the personal data of specific individuals (subjects) and the lawful basis for that processing.

It describes the kind of information about 'Subjects' that Ashford Partnership Against Crime Ltd processes and what it does with that information.

1. Who we are and what we do – our role is explained in our website introduction.

Website: www.disc-net.org/ashford

Address: c/o Community Safety Unit, Kent Police Station, Ashford, Kent. TN23 1BT.

Email admin@apac-kent.co.uk

2. Ashford Partnership Against Crime's Data Controller is responsible for ensuring its compliance with current Data Protection law and can be contacted at the above postal or email address. The Scheme is registered with the Information Commissioners Office as a Business Crime Reduction Partnership.

The Scheme employs the services of the following Data Processors:

Littoralis Disc, Suite 210, 91 Western Road, Brighton. BN1 2LB. UK <https://discagainstcrime.com/contact/>

DISC provides the members-only online intelligence sharing database.

3. Purpose of processing personal data

Members of Ashford Partnership Against Crime Ltd have the right to protect their property, staff and customers from crime and anti-social behaviour and to exclude from their premises any individuals who are considered threats to their property, staff or customers or who disrupt the peaceful enjoyment that their customers expect from the goods and/or services that our Members offer. Ashford Partnership Against Crime Ltd processes Subjects' personal data for the management of its Exclusion Scheme on behalf of its Members;

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to inform Members of an offender's modus operandi; to collate intelligence on criminal activity within the area of the Ashford Partnership Against Crime's operation; and to contribute to legal proceedings against offenders where appropriate.

4. Ashford Partnership Against Crime's area of operation, and its Exclusion Scheme, is within the boundaries of the Borough of Ashford & Tenterden.

5. Types of processing

Ashford Partnership Against Crime Ltd undertakes the following types of processing of personal data of Subjects:

- a. Data collection; see Sources of personal data below;
- b. Data storage; storage of Subjects' data in a facility independently certified as secure to a high standard;
- c. Data retention; see Data Retention period below;
- d. Data collation; associating individual Subjects with multiple incidents, and with other Subjects;
- e. Data sharing; as defined in Recipients, or categories of recipients, of personal data below;
- f. Data deletion; see Data Retention period below;
- g. Data analysis; of de-personalised data for historical comparisons etc.

6. Lawful basis of processing

Ashford Partnership Against Crime Ltd Members' 'legitimate interests' provides the lawful basis on which it may process specific items of Subjects' personal data for specific purposes without Subjects' consent. Ashford Partnership Against Crime Ltd has assessed the impact of its processing on Subjects' rights and freedoms, has balanced these with its members' own rights, and has concluded that its members' rights prevail over Subjects' rights in this specific matter. Therefore, for the purposes of the management of its Exclusion Scheme on behalf of its members; to inform Members of an offender's modus operandi; to collate intelligence on criminal activity within the area of Ashford Partnership Against Crime's operation; and to contribute to legal proceedings against Offenders where appropriate.

7. Categories and types of personal data processed

- a. Subject's name, age, facial image and any relevant information about the nature of his/her activities may be processed; the purpose of this processing is to enable Members to identify Subjects in order to submit reports about them; to include them in a list or gallery of excluded persons (if appropriate and in line with

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Ashford Partnership Against Crime's Rules & Protocols); and to provide information about them which may be necessary to protect the property and personal safety of Members and their staff, customers etc. This data may be shared among Members and other agencies that have a legitimate interest.

b. Subjects' postal and email addresses, telephone number(s) and other contact details; the purpose of this processing is to enable Ashford Partnership Against Crime Ltd to communicate with Subjects from time to time, for example to send warning letters, confirmation of exclusions, rules of the exclusion scheme, or confirmation that exclusions have expired. Such data will not be shared with Members except for the purposes of civil recovery or any legal proceedings.

c. Information and evidence about incidents in which a Subject has been involved; the purpose of this processing is to enable Ashford Partnership Against Crime Ltd to authorise the issuing of Exclusion Notices, to inform Members of a Subject's modus operandi, to collate intelligence on criminal activity within the area of Ashford Partnership Against Crime Ltd.'s operation and to defend its legal rights against any claim or suit by a Subject or other party. Such data may be shared with Members.

d. For the purposes of identification, some sensitive or 'special category' personal data may be processed by the BCRP e.g., ethnicity and for the safety and protection of our members, some medical conditions where the condition has symptoms that would render the Subject a danger to our Members. The dissemination of this information to our members will not be widespread or general in nature but rather targeted to those most likely to be affected.

8. Subjects' personal data may be collected or provided to the BCRP from:

a. Subjects who may voluntarily offer information about themselves;

b. Members who may submit reports about incidents in which Subjects have been involved. They may also send relevant 'intelligence' about Subjects, for example they may provide a name when asked to identify an unidentified CCTV image;

c. Police or other public agencies may provide Subjects' personal data under a formal Information Sharing Agreement.

d. Social media platforms where such information is in the public realm by virtue of being displayed, without privacy controls, on a publicly accessible platform.

9. The following may have access to Ashford Partnership Against Crime Ltd.'s data, including the personal data of Subjects: Kent Police and Partner Agencies, Ashford Partnership Against Crime Member Businesses, Subjects via a Subject Access Request; other similar organisations where the offender may operate.

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10. The BCRP will not transfer Offenders' data outside the UK.

11. Data retention period: When a Subject is reported by a Member for participating in any threat or damage to any Member's property, staff or customers, his/her name, date of birth and facial image together with any relevant information of offences or offending behaviour may be shared among Members for 12 months or for the period of exclusion which may be longer dependent upon the circumstances. If no further report is submitted during that period, the Subject's data will be withdrawn from Members at the expiry of that period. It will be retained for a further 12 months in the Scheme's database (which can only be accessed by the Data Controller and authorised personnel) after which time, if no further incidents are reported, it will be irrevocably deleted. If during the 12 months when a Subject's data is circulated among Members, he/she is reported for another incident involving any Member's venue, staff or customers, his/her name, date of birth and facial image may be circulated among Members for a further 12 months. Additionally, the Subject may be excluded from the properties of all or some Members for 12 months, and this fact will be shared with Members. If no further report is submitted by a Member during that period, the Subject's data will be withdrawn from Members 12 months after the expiry of that exclusion period. It will be retained for a further 12 months in the BCRP's database (which can only be accessed by the Data Controller and authorised personnel) after which, if no further incidents are reported, it will be irrevocably deleted.

Digital radio transmission data is recorded and stored by the Partnership on our secure servers. This data is retained for 6 months, after which it is deleted unless required by police or courts as part of an investigation. In those cases, the files will be retained for 6 years following which they will be deleted.

Subject / Offenders' rights inc Subject Access Requests

12. Every Subject has the right to view data held about them by the Partnership. To do so, the Subject must contact the Data Controller (see contact details above) requesting to view the information; the Subject will be required to provide proof of his/her identity, which may include attending a personal meeting. In any case Ashford Partnership Against Crime Ltd will respond to the request within 30 days of the subject confirming their identity and provide full documentation to demonstrate compliance with Data Protection law. If, when a Subject accesses his/her personal data, any of it is deemed by the Subject to be incorrect, unnecessary, or disproportionate, the Subject can require Ashford Partnership Against Crime Ltd to correct it. Subjects do not have the right to require Ashford Partnership Against Crime Ltd to delete information that

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is correct, necessary, or proportionate.

13. Subjects are able to complain about Ashford Partnership Against Crime Ltd to the Information Commissioners Office.

Subjects can submit a complaint on the ICO's website at <https://ico.org.uk/concerns/handling/>

APAC Ltd is registered with the ICO: Registration Number ZA772305

Our membership is reviewed annually by the Data Controller; any changes to our registration is communicated to the ICO Registration Department.

PRIVACY STATEMENT - GENERAL PUBLIC

Ashford Partnership Against Crime Ltd is committed to protecting your privacy. This Privacy Statement explains how we use the information which we may collect through the Ashford Partnership Against Crime Ltd website (the "website"). References in this Privacy Policy to "we"/ "us" shall be deemed to be references to Ashford Partnership Against Crime Ltd. If you are a member of Ashford Partnership Against Crime Ltd or a Subject who has received a warning or exclusion notice from us then please see the relevant Privacy Notice on the Ashford Partnership Against Crime Ltd website which explains how we may retain, use, process your information.

1.1 If you have any queries in relation to our Privacy Statement, please contact us at: c/o The Community Safety Unit, The Police Station, Ashford, Kent. TN23 1BT or by email at admin@apac-kent.co.uk

1.2 We process personal data in accordance with the Data Protection Act 2018.

1.3 Where the website contains links to other websites, we are not responsible for their privacy practices. This privacy statement applies solely to the Ashford Partnership Against Crime Ltd website.

1.4 If you are not happy with our Privacy Statement, we ask that you stop using the website.

1.5 By submitting information to us via our Contact form or using our website you consent to the collection

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and use of your personal information in the manner set out in this Privacy Statement.

Personal Information

2.1 It may be necessary for us to collect your personal information. The types of information collected will vary depending on your use of the website, as described below.

2.2 To contact us you are required to give your contact information (name, email address and phone number). This will trigger an email to us to contact you in relation to your enquiry. Information you send us for the purpose of your enquiry could be with a view to membership. This information will be treated by us with the greatest care and for the purpose of the enquiry only.

Use of Information

3.1 Personal information will only be used for the purpose for which you have provided; to communicate with you about our work, your use of our website and/or changes to the website.

3.2 In order to provide our services we keep a record of all correspondence to help us keep track of the enquiries we receive, to comply with the law.

3.3 We will never pass your personal information to anyone else without your consent.

3.4 If your personal information changes or if you no longer wish to receive communication or emails from us, please let us know and we will correct, update or remove your details. This can be done by writing to us at Ashford Partnership Against Crime Ltd, c/o The Community Safety Unit, The Police Station, Church Road, Ashford, Kent. TN23 1BT

Security

4.1 Ashford Partnership Against Crime Ltd follows strict security procedures in the storage and disclosure of information which you may give to us, to prevent unauthorised access. However, the Internet is not a secure environment, and we cannot guarantee the security of any information.

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