



Dover Partnership Against Crime

(‘the Scheme’)

PRIVACY NOTICE (OFFENDERS)

This document describes the Scheme, explains why it will process your personal data and the lawful basis for that processing.

It describes the types of processing we will carry out, and the kind of information about you we will process. It also explains how we obtain your personal data, who we will share it with and for how long we will keep it.

At the end of the document, you will be able to read about your rights.

About: Dover Partnership Against Crime

We are a membership organisation made up of business owners or their representatives, Police and Local Authority partnerships and accredited partner Business Crime Reduction Schemes. The purpose of the Scheme is to prevent, detect, or reduce the impact of low-level crime and anti-social behaviour on local businesses within Dover Partnership Against Crime Area and/or any additional area that the Board of Management may decide.

Contact details.

Dover Partnership Against Crime
Maison Dieu House,
Biggin St
Dover
CT16 1DW
Tel: 07967 077493
Email - dpac.org.uk@gmail.com

Because the Scheme will process personal data, including your own, it is registered with the Information Commissioners Office.



One of the Scheme's obligations under the law is to provide you with all the information you may wish to know about why and how it will process your personal data – and tell you about your rights. This is the purpose of this document.

Purpose of processing personal data

The Scheme is a membership organisation which represents its members who have the right to protect their premises, property, staff and customers from crime and anti-social behaviour, and to exclude from their premises any individuals who are threats to their premises, property, staff, or customers.

Where an individual has been reported by a Member of the Scheme or one of our Partners for direct involvement in an incident that represents such a threat, the Scheme will process that individual's personal data for the specific purpose of enabling Members to exercise their rights.

The Scheme's Members will share the personal data of that individual among themselves so that they can identify the individual and may exclude the individual from all the properties of all scheme Members, across the Scheme's Area of Activity which is Dover Partnership Against Crime Area, or any additional area as stipulated by the Scheme's Board of Management.

You have been reported as having been involved directly in one or more incidents that represented a threat to one or more Members' premises, property, staff, or customers, and therefore your personal data will be processed by the Scheme, under the heading 'Offenders Data', on behalf of its members.

Lawful basis of processing

The Scheme's Members' 'legitimate interest' provides the lawful basis on which it may process specific items of Offenders' personal data for specific purposes without your consent.

The Scheme may process Special Category Data under Schedule 1, Part 2 of Data Protection Act 2018 as the Scheme has a substantial public interest in preventing and detecting unlawful acts.

The Scheme also processes alleged or suspected criminal activity under Schedule 1 Part 3 of the Data Protection Act 2018, Paragraph 36 for Substantial Public Interest.



Types of processing

The Scheme undertakes the following types of processing of personal data of Offenders:

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

Personal, Special Category and Criminal Activity data

The Scheme may collect the following types of personal data relating to identified and unidentified Offenders:

Names; Addresses, Images (including Police Custody Images, Members' CCTV Images and Open-Source images); date of birth; descriptions; ethnicity; aliases; associates who commit retail crime (including partners); vehicles; arrests; suspected/attempted criminal or anti-social activity; convictions; warning markers; health information.

Sources of personal data

Offenders' personal data may be provided to the Scheme by:

- **Offenders** who may voluntarily offer information about themselves.
- **Members** who may submit reports about incidents in which Offenders have been involved. They may also send relevant 'intelligence' about Offenders, for example they may provide a name when asked to identify an unidentified CCTV image.
- **Police or other public agencies** may provide Offenders' personal data under a formal Information Sharing Agreement.



- **Data Controllers of other organisations, similar to the Scheme**, in other areas where there is evidence that an Offender has participated, or is likely to participate, in any threat or damage to premises, property, staff and customers in those areas.

Recipients, or categories of recipients, of personal data

The following types of individuals may have access to the Scheme's data, including Offenders' personal data:

- **Members** who are property owners, agents or their employees working within the operational area of the Scheme who share the same legitimate interests.
- **Employees and officers of public agencies** involved in the prevention and detection of crime, such as police, whose lawful basis for processing your data is their public task.
- **Data Controllers of other organisations, similar to the Scheme**, in neighbouring areas if there is evidence that an Offender has participated, or is likely to participate, in any threat or damage to property, staff and customers in areas outside the Scheme's area of operation.

The Scheme will not transfer Offenders' data outside the UK.

Data retention period of: -

Unidentified Offenders

Unidentified Offenders (CCTV Images) will be displayed to members for 6 months from the date of the incident unless they are identified sooner. In that case, they may be treated as Targeted or Excluded. If they do not fit either criterion, they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 6 months on the Disc Database, only viewable by Administrators and Sub-Administrators before it is irrevocably deleted.

Criteria for Unidentified Offender: - Any report by a Member of an Offender whose identity is unknown.

Targeted Offenders

Targeted Offenders' data will be displayed to members for at least 6 or 12 months from the date of the incident (depending on the incident type) unless they are identified as being involved in further incident(s). In that case, they may have that 'view' date extended by up to a further 12 months or may be treated as Excluded. If they do not fit



that criterion, they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 12 months on the Disc Database, only viewable by Administrators and Sub-Administrators before it is irrevocably deleted.

Criteria for a Targeted Offender: - An Offender who has been reported by a member, employee or officers of public agencies or other organisations similar to the Scheme, for their direct involvement in an incident that represents a threat to members of the Scheme.

Excluded Offenders: -

Excluded Offenders' data will be displayed to members for the period of any exclusion imposed unless they are identified as being involved in further incident(s). In that case, they may have that 'view' date extended by up to a further 12 months. Once their Exclusion period has ended, they will revert to being 'Targeted' for 12 months and their data treated as above. Once they do not fit that criterion, they will cease to be displayed to members. Once the data has ceased to be displayed to members, it will be retained for 12 months on the Disc Database, only viewable by Administrators and Sub-Administrators before it is irrevocably deleted.

Criteria to Exclude: - **1.** Offering violence or being abusive towards owners/employees/representatives, security, customers or Police on arrest or detention (Zero Tolerance). **2.** Involved in an incident of significant other crime or ASB. **3.** Already Displayed as 'Targeted' and is involved in further anti-social behaviour or crime at or near a member premises. **4.** Already displayed as 'Excluded' and enters or attempts entry to any premises registered on the Scheme or is involved in further anti-social behaviour or crime at or near a member premises.

Your rights – Subject Access Requests

You have the right to obtain a copy of all the personal data which the Scheme holds about you; to do so the Offender must contact the Data Controller (see contact details above) and submit a Subject Access Request; you will be required to provide proof of your identity. This may require identification in person by personal facial recognition. In any case the Scheme will respond to your request within 30 days.

1. As soon as practical thereafter the Data Controller must:
 - a. collect all personal data relating to the applicant, including image(s).
 - b. redact all data identifying any other person from the data.



- c. provide the relevant personal data to the applicant, in a conventional, readable format.
- d. provide all documentation demonstrating the Scheme's compliance with Data Protection law.
- e. inform the applicant of his/her right to require corrections of any data which the applicant can demonstrate to the satisfaction of the Data Controller is incorrect, unnecessary, or disproportionate.

Document the completion of the SAR process.

If, when you access your personal data, any of it is found to be incorrect, unnecessary, or disproportionate, you can require the Scheme to correct it. You do not have the right to require the Scheme to delete any data which is correct, necessary, or proportionate for the Scheme's purposes of processing.

You have the right to complain about the Scheme to the Information Commissioners Office; you can submit a complaint on the ICO's website at <https://ico.org.uk/concerns/handling/>