



Dartford Town Against Crime
C/O Community Safety Unit
Civic Centre , Home Gardens
Dartford
DA1 1DR

T: 01322 343400

DTAC – Dartford Town 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 DTAC

We are a membership organisation made up of local businesses, police, local authority departments, town centre management and other agencies. It is managed by a board of management (BoM) made up from the membership. The partnership is non-political and non-profit making. The purpose of the Scheme is to prevent, detect, or reduce the impact of, low-level crime and anti-social behaviour on local businesses in the area of Dartford Borough.

Contact details

DTAC – Dartford Town Against Crime, Community Safety Unit, Dartford Borough Council, Civic Centre, Dartford, DA1 1DR
Email: intel.manager@dartford.gov.uk
Tel: 01322 343400 / 07881 844153

Because the Scheme will process personal data, including your own, it is registered with the Information Commissioners Office (Registration Number Z7629935 as a Business Crime Reduction Partnership)

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 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 the Borough of Dartford.

You have been reported as 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 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 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, Images (Police Custody Images & Members' CCTV 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.

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

Data Retention: We shall retain data for as long as a subject is 'active' in our locality.

However, data over two years old will be deleted under yearly audits e.g. even if a subject is active, any incidents over 2 years previously shall be deleted.

If a subject only comes to notice once and no further reports are received, they shall be deleted after 12 months.

Images of unidentified offenders shall be deleted after 12 months.

Information regarding vulnerable persons shall be held for the same time period as above.

Information concerning persons under 14 shall not be retained unless there is a significant public interest and the agreement is obtained from the police and DTAC Board of Management.

Information regarding persons under 18 shall be retained if they are active but this shall be deleted if they have not come to notice for more than 12 months.

When an Offender is reported by a Member for participating in any threat or damage to any Member's property, staff or customers, his/her name and facial image may be shared among Members for 12 months. If no further report is submitted during that period, the Offender'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) after which time it will be irrevocably deleted.

If, during the 12 months when an Offender's data is circulated among Members, he/she is reported for another incident involving a threat or damage to any Member's property, staff or customers, his/her name and facial image will be circulated among Members for a further 24 months from the date of the second report. Additionally, the Offender will be excluded from all the properties of all Members for a set period, in line with Exclusion Policy, and this fact will be shared with Members. If no further report is submitted by a Member during that period, the Offender'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) after which it will be irrevocably deleted.

The above limits are to ensure that data is kept no longer than necessary to prevent and detect offending against members, their staff and property. Once it can be assumed they are no longer of interest and not involved in such behaviour locally, their records shall be deleted.

Offender Profiles and Incidents on the DTAC Members Only access website:

Type of Data	Active Profile	Inactive Profile
Known Offender Profile	Will be kept live all the time the offender is active*	Profile and photos will be removed from member view after one year but will be retained for a further year, unpublished and hidden from member view. A record of deleted profiles is retained by the Crime Manager, in case of any Subject Access Request.

Unknown offender profile	Will be retained for one year	Profile and photos be deleted after one year if no further incidents have occurred. Record of deleted unknown profiles is not retained.
Under 18 years old	Will be retained for one year	Profile and photos will be deleted after one year if no further incidents have occurred. A record of deleted profiles is retained by the Crime Manager, in case of any Subject Access Request.
Under 14 years old	Will only be retained if there is significant public interest, for a period of one year, with approval of Police and Board of Management	Will be deleted after one year if no further incidents have occurred. A record of deleted profiles is retained by the Crime Manager, in case of any Subject Access Request.
Incident information	Will be kept live for two years, then deleted	Will be kept live for two years, then deleted

*Active is defined as having committed offences against our member businesses within the period of one year.

Your rights

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); you may be required to provide proof of your identity. In any case the Scheme will respond to your request within 30 days.

If, when you accesses 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/>