



Warwickshire Retail Crime Initiative

Privacy and Data Handling Policy

Working in partnership to prevent and reduce crime and anti-social behaviour in retail and licensed business premises in Warwickshire

Member of National Association of Business Crime Partnerships

1. Privacy Policy Introduction

- a. The Warwickshire Retail Crime Initiative Limited (WRCI) is a County wide, membership organisation employing a Partnership approach to prevent and reduce crime and anti-social behaviour in retail and licensed business premises in Warwickshire.
- b. Members are supported by the provision of 'information profiles' of individuals where their criminal or anti-social behaviour satisfies the criteria for inclusion.
- c. These individuals may be 'excluded' from members premises.
- d. WRCI is committed to handling, processing and protecting all the data it handles in accordance with the General Data Protection Regulations (GDPR) 2018 and the Data Protection Act 2018.
- e. WRCI is registered with the Information Commissioner for the purpose of 'the prevention and detection of crime and the prosecution of offenders', under Registration Number Z9138572.

2. Contact Details

Warwickshire Retail Crime Initiative, Safer Neighbourhood Team, Rugby Police Station, Newbold Road, Rugby, Warwickshire CV21 2DH

3. Data

- a. WRCI holds data on members, and 'individuals' from information reports supplied by members. All membership data is held and processed on a password protected online encrypted platform called DISC. (www.discagainstcrime.com)
- b. A person is added to DISC if they are known to be currently actively involved in committing or attempting to commit crime or acting in an anti-social manner and are subject of an information report via DISC or the previous system ACIS or a Police incident report.
- c. Unknown individuals are added to DISC where an image is provided with a member information report. These individuals are known as 'id soughts'. The report and photo remain on the DISC database for 21 months from the date of report if they are not identified.
- d. The WRCI Board has appointed a Data Controller and Data Processors who are the WRCI Administrators employed by WRCI Limited.
- e. WRCI has a data sharing agreement with Warwickshire Police for the provision of images, authorised intelligence reports, access to the Police National Computer (PNC) and the Police Incident Management system for information collection on individuals who meet the criteria for research or inclusion in the 'target package' to members.
- f. WRCI does not have a data sharing agreement with any party other than members.

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- g. WRCI may share data on individuals held on DISC with other retail crimes schemes or approved data sharing platforms.
- h. WRCI has carried out a Data Protect Impact Assessment on the content and handling of individuals added to DISC.
- i. WRCI monitors, via DISC, log-in information and the printing of information from DISC by members and submission of information reports.

4. Membership Data

- a. WRCI holds the business name and address, contact names, contact emails, contact telephone numbers and information provided for invoice purposes of members.
- b. WRCI processes members data to:
 - i. Advise Servicom of the members contact detail for invoice purposes
 - ii. Contact them to provide updates to DISC and weekly newsletters
 - iii. Send alerts by email for the prevention and detection of crime,
 - iv. Request them to attended meetings
 - v. Make personal contact for WRCI administrative purposes.
 - vi. Monitor the submission of 'information' reports.
- c. Members may request a copy of the information held on them by WRCI and ask for this to be deleted or amended.
- d. All membership data will be deleted if the member leaves the scheme, except for the premises name and address, except where this is recorded in an 'information report' in which case this will be retained on the live system for two years and then archived for a further four years.
- e. WRCI will not provide any membership data to any third party unless the member gives permission.
- f. WRCI does not collect any sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc) in respect of members. WRCI does not stereotype when recording information on individuals subject of information reports.

5. Data collection

- a. In the development of information on an individual provided to members WRCI will collect data from information reports and data from and through Warwickshire Police under a data sharing agreement.
- b. This information may include sensitive or 'special category' personal data (ethnicity, sexuality, religious beliefs etc), only if it is necessary and proportional to record this information.

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- c. WRCI does not collect or process any data on a person under 16 years of age. We may process data for a person aged 16 to 17. Each instance will be holistically assessed against necessity, proportionality, threat and risk.
- d. An individual will only be added to DISC if they satisfy the criteria outlined in paragraph 3b.
- e. Information can only be accessed by members with a login authorisation for DISC.

6. Member obligations

- a. Members must ensure that information from DISC that they have access to is kept and handled securely to ensure that privacy is maintained.
- b. Each user of DISC must have their own individual email and password.. Members must not access DISC using a shared email and password.
- c. Members must:
 - i. Securely store any electronic device used to access DISC web.
 - ii. Not leave DISC 'logged in'.
 - iii. Not disclose their passwords for accessing DISC web to any other person.
 - iv. Not disclose and data to 'non-members' or persons who are not employees of the member business.
 - v. Securely store and not leave in public view any images they may have printed from DISC.
 - vi. Record any showing of images to member business employees.
 - vii. May not produce or recirculate 'DISC data' in any form, for example using a mobile telephone to photograph and image and then forwarding it electronically.
 - viii. Not disclose any issues discussed at 'members meetings' to any non-member.
 - ix. Not forward the weekly 'News' email to any non-member.

7. Information Reports

- a. Members can submit via the encrypted DISC system 'information reports' on incidents within or outside their premises. These may contain images, video and the names of individuals. These reports are imported into DISC.
- b. Members may also submit 'information reports' in written form. Once added to DISC they must be scanned and retained in a secure folder on the Warwickshire Police computer system. The form will then be securely shredded and disposed off using the Police secure disposal process.
- c. Where images are submitted, if these are used on DISC WRCI must ascertain that they were taken lawfully.
- d. These are retained for two years on the live system and four years in the archive.

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- e. If an individual is named in an information report, they are informed in writing that they have been identified as a person of interest to WRCI because of their behaviour. If they are aged 16 – 17 years, then the parent or guardian will also be informed in writing.

8. Individual Rights

- a. An individual may ask for a details of the personal information that WRCI holds about them (subject access request) to have any inaccuracies in the information corrected.
- b. Where WRCI holds data for which they are not the data controller, they will not release that data.
- c. It may be necessary to redact (censor or obscure) some data for legal or security purposes, especially if the information is concerning another Individual or classed as confidential as above.
- d. If a named person is the subject of an information report, and is added to DISC or is 'banned from scheme premises' they will be informed in writing via the post to their last known address.

9. Subject Access Request

- a. Subject access requests should be made in writing to Warwickshire Retail Crime Initiative, Safer Neighbourhood Team, Rugby Police Station, Newbold Road, Rugby, Warwickshire CV21 2DH
- b. These will be answered with 30 days. There is no fee. Personal identification is required such as a passport or photo driving licence.

10. Exclusions

An individual may be excluded from all member premises if they satisfy the criteria in the WRCI Exclusion Policy.

11. WRCI Website

WRCI has a website, wrci.org.uk. The website complies with the policy on cookies for tracking visitor activity. The website hosting company Xperience Web Hosting Ltd, Suite 34, New House, 67-68 Hatton Garden, London EC1N 8JY collects information on visitors. WRCI may from time to time view information collected on visitors. Web browsers have the option to turn cookies off.

Certification

I certify that I have read and will comply with all the conditions in this document:

Member name:

User Print Name:

User Signature:

Date:

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