



## Warwickshire Retail Crime Initiative

*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 and  
National Business Crime Solutions - Accredited by Secured by Design

### PRIVACY NOTICE (OFFENDERS)

This document describes the Scheme and 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 Warwickshire Retail Crime Initiative

The Warwickshire Retail Crime Initiative (WRCI) is a membership organisation made up of Owners, or their representatives, of private property or other private facilities open to the public in the Scheme Area, Officers of public agencies statutorily tasked with the prevention and / or detection and / or reduction of crime and / or anti-social behaviour in the Scheme Area and Administrators or Sub-Administrators of Partner schemes who share a similar legitimate interest.

#### Contact details

Warwickshire Retail Crime Initiative, Safer Neighbourhood Team, Rugby Police Station, Newbold Road, Rugby, Warwickshire CV21 2DH Email: [enquiries@wrci.org.uk](mailto:enquiries@wrci.org.uk)

Because the Scheme will process personal data, including your own, it is registered with the Information Commissioners Office: Registration Number: Z9138572

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 purpose of the Scheme is to prevent, detect, or reduce the impact of, crime and anti-social behaviour on local businesses in Warwickshire. Members 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 proven threats to their property, staff or customers or disrupt the peaceful enjoyment that their customers expect from the goods and/or services that our Members offer.

WRCI processes Offenders' personal data for 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 operation and to contribute to legal proceedings against Offenders where appropriate.

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.

Scheme members can view the personal data of that individual based on their geographical location within Warwickshire and the potential impact of that individual's reported activity.



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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 county of Warwickshire.

### 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 Members' 'legitimate interests' provides the lawful basis on which it may process specific items of Offenders' personal data for specific purposes without Offenders' consent. The BCRP has assessed the impact of its processing on Offenders' rights and freedoms, has balanced these with its Members' own rights, and has concluded that its Members' rights prevail over Offenders' 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 the BCRP's operation and to contribute to legal proceedings against Offenders where appropriate, Members' legitimate interests constitute the BCRP's lawful basis for processing Offenders' personal data without requiring 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:

- a. **Data collection;** see **Sources of personal data** below.
- b. **Data storage;** storage of Offenders' 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 Offenders with multiple incidents, and with other Offenders.
- 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.

### 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, other open source imagery), 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.



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- **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

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, 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 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 and authorised personnel) after which time, if no further incidents are reported, it will be irrevocably deleted.

### Your rights

You have the right to obtain a copy of all the personal data which the Scheme holds about you; to do so you 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 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/>