

request the offender's details to be disclosed by the police using the appropriate policy and paperwork. If the information is to be retained, a decision will be made as to whether it is to be made available to members to assist in the prevention and detection of crime and the prosecution of offenders, or whether it is to be retained for a defined period of time to ensure that any future offending behaviour by that person may be linked and further action taken in light of that.

Where personal data is to be made available to members, it will be by electronic means through a database system designed for that purpose and operated exclusively by the partnership for that purpose.

The number of persons affected by this will vary depending on levels of criminal activity and other local conditions. All personal or sensitive personal data will only be processed in accordance with the data protection principles set out in the Act.

Consultation Requirements

Consultation has taken place internally with the board of management/directors who are local business members of the partnership and other persons co-opted as board members, as well as the broader membership to ensure that they are fully aware of the nature of the work of the partnership, their duties in respect of oversight of the work of the Business Crime Manager and the liabilities which may be incurred in the event of any failure.

Externally, the Business Crime Manager is in regular communication with the police, who are supportive of the work of the partnership and who have access to partnership data for the purposes of the prevention and detection of crime and the prosecution of offenders, and who also provide the partnership with selected information to assist in that purpose. The partnership has an information sharing agreement with Kent Police which sets out in detail what data the police will provide to the partnership, who it may be circulated to, its retention period and other restrictions, permissions or reviews.

Risk Assessment

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
Targeting or identification of offenders, suspects or persons of interest	Incorrect identification of persons of interest and circulation of information	Failure to properly validate information	Breaches of DPA, reputational damage

Privacy Solutions

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
Incorrect processing or circulation of data relating to individuals	Ensure ALL information is properly and thoroughly checked before consideration is given to circulation to members	The risk is reduced considerably	Provided the intelligence related to each potential offender is subject to proper review and analysis before it is considered for circulation, then the subsequent response is proportionate to the risk and is a legitimate aim of the partnership

Outcomes

Risk	Approved solution	Approved by
Incorrect processing or circulation of data relating to individuals	<ol style="list-style-type: none">1. Correct assessment by the Business Crime Manager2. Oversight of the Business Crime Manager by a nominated board member or director (the data protection officer)	The board of management/directors of the partnership

Contact point for future privacy concerns

The Business Crime Manager is the initial contact point for the partnership. They will bring any privacy concerns or subject access requests to the immediate attention of the board or designated board member.