Tunbridge Wells



Partnership

Privacy Impact Assessment

The Tunbridge Wells Business Crime Reduction Partnership has been established to assist members of the business community in the area, who are vulnerable to theft, intimidation and assault, anti-social behaviour and other criminal activity by customers or anti-social elements. The members join together to share and exchange information about the activities of suspects, whether identified or not; to take steps to alert other members to the presence of those potential risks; to exclude potential offenders from their business premises; to arrest them or to take such other action either jointly or singly, to prevent theft, violence and anti-social behaviour and to protect their assets and staff.

Members will be encouraged to identify offenders by name, if known, or by description, and to communicate information about those persons, their movements and their associates, where it is suspected or believed that the intention and presence of those persons is or may be unlawful.

The need for a PIA has been identified because new information of criminal behaviour will be collected about individuals and disclosed to the members and partners who are organisations and people who have not previously had routine access to the information. The information will also be used to assist the Board of Management to make decisions and subsequently take action against individuals that could have a significant impact on them in the form of exclusion notices.

Information Flows

Where a criminal offence has been committed against a member, that member, apart from any notification to police, should complete an incident report and forward it to the Business Crime Manager of the partnership.

The Business Crime Manager will assess that information for accuracy and relevance before making a decision as to whether the information should be retained or disposed of forthwith. If the offender is unknown but the incident has been dealt with by police, the Business Crime Manager will

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		

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

Risk	Ap	proved solution	Approved by
Incorrect processing or circulation of data relating to individuals	1.	Correct assessment by the Business Crime Manager	The board of management/directors of the partnership
	2.	Oversight of the Business Crime Manager by a nominated board member or director (the data protection officer)	

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.