



Appropriate Policy Document

As part of York BID Safety Network's function as a British Crime Reduction Partnership, we process Special Category and Criminal Offence data in accordance with Article 9 and 10 of the UK General Data Protection Regulation (UK GDPR) and Schedule 1 of the Data Protection Act (2018) (DPA).

This policy will tell you what Special Category and Criminal Offence data we process, our lawful bases (including our schedule 1 condition in the DPA) for processing that data, the purposes for which we process it, and how we ensure compliance with the principles of data protection law provided in Article 5 of the UK GDPR.

Description of the Data Processed

We process the following types of Special Category and Criminal Offence data:

- Racial/ethnic origin
- Criminal offence data

Schedule 1 Condition for Processing

YBSN process special category data for the following purposes in Part 2 of Schedule 1:

- Paragraph 10 (1) Preventing or detection of unlawful acts
- Paragraph 11 (1) Protecting the public against dishonesty etc
- Paragraph 12 (1) Regulatory requirements relating to unlawful acts and dishonesty etc.

Procedures for Ensuring Compliance with the Principles

Accountability Principle

YBSN take responsibility for complying with UK GDPR. We put in place appropriate technical and organisational measures such as:

- Adopting and implementing data protection policies
- A written contract with ShopSafe Alert! to process personal data on our behalf
- Implementing appropriate security measures
- Recording, and where necessary, reporting personal data breaches
- Carrying out a *Data Protection Impact Assessment*
- Carrying out yearly reviews of all data policies and procedures

Principle (a): lawfulness, fairness and transparency

YBSN have identified an appropriate lawful bases for our processing. We have also identified conditions, as above, for special category and criminal offence data. (*Personal Data Processing Policy for Members and Offenders*)

We have considered how the processing may affect the individuals concerned and can justify and adverse impact (*DPIA*).

We are open and honest, and comply with the transparency obligation of the right to be informed (*Personal Data Processing Policy for Members and Offenders, and Subject Access Policy*).

Principle (b): purpose limitation

YBSN have clearly identified our purpose for processing. (*Personal Data Processing Policy for Members and Offenders*)

Data Policies are reviewed and, where necessary, updated yearly.

Principle (c): data minimisation

YBSN only collect personal data we need for our specified purpose. We review data we hold, and delete anything no longer relevant. (*Personal Data Processing Policy for Members and Offenders*)

Principle (d): accuracy

YBSN ensure the accuracy of any personal data within the Alert! database (*DPIA*). Any data updated to the database, the source of said data is recorded alongside. Information where the originator cannot be identified will be destroyed.

Members can correct any erroneous data at any time on Alert! or via the Scheme or ShopSafe staff to correct any errors on their behalf. (*Personal Data Processing Document Members*).

If, when an Offender accesses their personal data, any of it is found to be incorrect, unnecessary or disproportionate, the Offender can require the Scheme to correct it. Offenders do not have the right to require the Scheme to delete correct, necessary or proportionate information. (*Personal Data Processing Document Offenders*).

Principle (e): storage limitation

YBSN have a policy with standard retention periods (*Personal Data Processing Policy for Members and Offenders*)

Principle (f): integrity and confidentiality (security)

Shop Safe Limited process data on behalf on YBSN.

YBSN have an *Information Security Policy* for members and *Data Integrity Statement* in place.

Retention and Erasure Policies

YBSN have explained our retention and erasure policies for Special Category and Criminal Offence data in our *DPIA* and *Personal Data Processing Policy for Offenders*.