

# ***Inverness Women's Aid***

## **Privacy Notice – Women**

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your support and after it ends. We are required to make you aware of this information under data protection legislation. Please make sure that you read this privacy notice and any other similar notice that we may provide to you from time to time when we collect or process personal information about you.

### **Who collects the information**

**Inverness Women's Aid** is a 'data controller' and gathers and uses certain information about you. Where **Inverness Women's Aid** is also a 'data processor', we will process information received from third parties about you.

### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy. This means we promise to respect and keep safe any personal information you share with us about you and your child(ren) and information we get from other agencies/organisations.

### **About the information we collect and hold**

The tables set out on the following pages, called Appendix 1, summarises the information we collect and hold, explains how and why we hold it, and how long we keep it. Details on how we use the information and agencies/organisations we may share your information with can be found in Appendix 2.

In providing our services, **Inverness Women's Aid** will normally share personal information with other agencies/organisations. Please see Appendix 1, this will tell you when we will seek your consent to do so.

We make sure that all data sharing is done securely, and that it is proportionate. By proportionate, we mean that we share only the minimum amount of personal data required, and only with those that need to have access to this information.

However, there are exceptional circumstances where we may have to disclose personal information without your consent. These are:

- If we believe that either you or someone else linked to you is at risk of significant harm. **Inverness Women's Aid** staff have a duty to report any issues relating to child protection or adult safeguarding.
- Where an issue comes up that means we have a requirement to disclose your personal information.

In certain circumstances, we will notify you of any changes to information we collect or the purposes for which we collect and process it.

## Where information may be held

Information will be held on our secure management system (OASIS) which is only accessed by staff at **Inverness Women's Aid**. Paper copies of your information may also be stored, this will be done securely and only accessed by relevant staff of **Inverness Women's Aid**.

We have security measures in place to seek to ensure that there is appropriate security for information we hold.

## How long we keep your information

Women's Aid keeps your information for no longer than is necessary for the purposes for which we collected information in the first place. Further details on this can be found in our Retention policy and the tables on the following pages. If you would like to see a copy of this policy, you can ask your support worker or contact the office.

## Your rights to correct and access your information and to ask for it to be erased

Please contact **Inverness Women's Aid at 2 Anderson St, Inverness IV3 8DF**, either by e-mail, ([info@Invernesswomensaid.org](mailto:info@Invernesswomensaid.org)) telephone (01463 220719) or in writing if you would like to make any changes to the information that we hold relating to you, if you would like to see this information or if you have any questions about this notice. You also have the right to ask **Inverness Women's Aid** for the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Please contact us if you require further information on this.

## Keeping your personal information secure

**Inverness Women's Aid** has taken care to make sure that the personal information we hold about you is protected from being accidentally lost, used or accessed by someone who does not need to see it.

We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you of a suspected data security breach where we are legally required to do so, as well as any applicable regulator e.g. the Information Commissioner's Office (ICO), Police Scotland. Information about data security can be found in our Data Protection Policy.

## How to complain

If you have any questions or concerns about our use of your information or if you want to make a complaint about the way we have processed your personal information, you can contact **the Executive Manager**.

If you are unhappy with our response, you can contact the ICO at <https://ico.org.uk/make-a-complaint/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Schedule relating to the information we collect and hold

Appendix 1

The information we collect	How we collect the information	Why we collect the information and how we use it	How long we keep your information for
<b>Your name, address, date of birth, telephone number, e-mail address, NI number</b>	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To identify you on our system/in our records to enable us to contact you.	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .
<b>Relevant information on the abuse you have experienced</b>	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To complete a risk assessment and safety planning to ensure your safety and that of others. This will help us to provide you with tailored support that meets your needs.	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings.
<b>Information on your individual support needs (e.g. needs relating to safety and housing)</b>	From you	Legitimate interest: To put together a support plan which is tailored to your individual support needs.	Six years from when the support service has ended because information may be needed for further

			support and possible involvement in legal proceedings .
<b>Ethnicity, cultural and religious information, nationality</b>	From you or other agencies (as detailed in Appendix 2)	<p>Legitimate interest: To understand your individual needs and to be able to provide you with tailored support.</p> <p><b>AND</b></p> <p>Explicit consent: We will seek your explicit consent ensuring that it is a clear and specific statement of consent in order to understand your individual needs and to be able to provide you with tailored support.</p>	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .
<b>General health information and information on any addictions</b>	From you or other agencies (as detailed in Appendix 2)	<p>Legitimate interest: To understand your individual needs and to be able to provide you with tailored support.</p> <p>To complete a risk assessment and safety planning to ensure your safety and that of others.</p>	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .

		<p><b>AND</b></p> <p>Explicit consent:</p> <p>We will seek your Explicit consent ensuring that it is a clear and specific statement in order to be able to provide you with tailored support that meets your needs.</p> <p>To complete a risk assessment and safety planning to ensure your safety and that of others.</p>	
<p><b>Details of your emergency contact (name, number and relationship to you), your place of birth, occupation, mobile phone network, height, build, complexion, distinguishing marks, vehicle type and registration, access to passport</b></p>	<p>From you</p>	<p>Vital interest:</p> <p>To enable us to pass relevant information to Police Scotland should we have the need to report you as a missing person.</p>	<p>Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .</p>
<p><b>Information on any offences or criminal convictions relating to you</b></p>	<p>From you or other agencies (as detailed in Appendix 2)</p>	<p>Legitimate interest:</p> <p>To understand your individual needs and to be able to provide you with tailored support.</p> <p><b>AND</b></p>	<p>Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .</p>

		<p>Explicit consent:</p> <p>We will seek your Explicit consent ensuring that it is a clear and specific statement in order to be able to provide you with tailored support that meets your needs.</p>	
<p><b>Details of your partner/ex-partner (e.g name, date of birth, address, gender and relationship to you)</b></p>	<p>From you or other agencies (as detailed in Appendix 2)</p>	<p>Processing this data is exempt under DPA 2018, Schedule 1, Part 2, Para 17 and Schedule 2, Para 2</p> <p>To complete a risk assessment and safety planning to ensure your safety and that of others.</p> <p>To be able to provide you with tailored support that meets your needs.</p>	
<p><b>Information on your partner/ex-partner's offences and criminal convictions, including any bail conditions</b></p>	<p>From you or other agencies (as detailed in Appendix 2)</p>	<p>This processing is exempt under DPS 2018, Schedule 1, Part 2, Para 17 and Schedule 2, Para 2</p> <p>To complete a risk assessment and safety planning to ensure your safety and that of others.</p> <p>To be able to provide you with tailored support that meets</p>	<p>Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings .</p>

		your needs.	
<b>Other agency involvement</b>	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To complete a risk assessment and safety planning to ensure your safety and that of others. This will help us to provide you with tailored support that meets your needs.	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings.
<b>Information on referrals we have made to other agencies with your agreement</b>	From you	Legitimate interest: To be able to provide you with tailored support that meets your needs.	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings.
<b>Information on your children (e.g. names, ages and whether they live with you)</b>	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To complete a risk assessment and safety planning to ensure your safety and that of others. This will help us to provide you with tailored support that meets your needs.	Six years from when the support service has ended because information may be needed for further support and possible involvement in legal proceedings.
<b>Court and trial information (e.g. trial dates and outcomes)</b>	From you or other agencies (as detailed in Appendix 2)	Legitimate interest: To be able to support you through the court process at	Six years from when the support service has ended because information may

		relevant stages and keep you up-to-date with proceedings.	be needed for further support and possible involvement in legal proceedings.
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## Appendix 2 - Who we may share your information with

Agencies, organisations and other third parties that we may need to share information with (to ensure we meet your best interests and support you the best we can) include but may not be restricted to:

- Other Women's Aid groups
- Health (Health Visitor, GP, Psychologist, Psychiatrist, Mental Health Services, CPN)
- Highland Council and other local authorities (Housing, Social Work Children and Families, Social Work Adult Services, Social Work Criminal Justice)
- Police Scotland
- MARAC – this is a multi-agency meeting made up of key agencies that share information they all have about you, they share the information to try and make sure you are not at risk of harm. The agencies that typically attend are Women's Aid, housing, social work, education, police, other agencies may attend as appropriate.
- VIA (Victim Information and Advice)
- The Job Centre
- Department for Work & Pensions
- RASASH (Rape and Sexual Assault Services Highland)
- Addiction Services
- Clothes Bank
- The Foodbank
- Solicitors (acting on your behalf)