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 notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a ‘privacy notice’) and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

**Who collects the information**

ABWA (the ‘Organisation’) is a ‘data controller’ and gathers and uses certain information about you. Where the Organisation 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.

**About the information we collect and hold**

The table set out on the following pages, appendix 1, summarises the information we collect and hold, how and why we do so. Details on how we use it and with whom it may be shared can be found on appendix 2.

We ensure that all data sharing is done securely, and that it is proportionate. This means that we share only the minimum amount of personal data required, and only with those that need to have access.

In delivering our services ABWA will normally only share personal information with another agency/organisation with your consent, such as other Women’s Aid groups, Voluntary Organisations, Argyll & Bute Council and/or Police Scotland.

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 is at risk of significant harm. ABWA staff have a duty to report any issues relating to child protection or adult safeguarding.
* Where there is another legal reason or requirement to disclose your personal information.

We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

**Where information may be held**

Information will be held on our secure online data storage facility which is only accessed by us at ABWA, all data stored in this way is encrypted. Paper copies of your information may also be stored, this will be done securely and only accessed by staff and volunteers of ABWA.

**How long we keep your information**

We keep your information for a maximum of 8 years after your last contact with us. Further details on this can be found in our Data Protection Policy. A copy of this can be requested by asking your key worker or contacting the office.

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

Please contact ABWA either by e-mail, telephone or in writing if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask ABWA for the information we hold and process to be erased (the ‘right to be forgotten’). Please contact us if you require further information on this.

**Keeping your personal information secure**

ABWA has appropriate technical and organisational measures in place to prevent the personal information we hold about you from being accidentally lost, used or accessed in an unauthorised way.

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 and any applicable regulator of a suspected data security breach where we are legally required to do so.

**How to complain**

We hope that ABWA can resolve any query or concern you raise about our use of your information (please refer to our complaints policy, which is available on request). If not, you can contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) 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** |
| **Your name, address, date of birth, telephone number, e-mail address, NI number** | From you or other agencies (as detailed in Appendix 2) | Legitimate interest:  To identify you on our case management system and to enable us to contact you. |
| **Ethnicity, cultural and religious information, nationality** | From you or other agencies (as detailed in Appendix 2) | Explicit consent for non-MARAC cases:  To understand your individual needs and to be able to provide you with tailored support.  Necessary to protect the vital interests for MARAC cases:  To enable us to identify and manage risks to those assessed as being at high-risk from domestic abuse |
| **General health information and information on any addictions** | From you or other agencies (as detailed in Appendix 2) | Explicit consent for non-MARAC cases :  To be able to provide you with tailored support that meets your needs.  To complete a risk assessment and safety planning to ensure your safety and that of others.  Necessary to protect the vital interests for MARAC cases:  To enable us to identify and manage risks to those assessed as being at high-risk from domestic abuse |
| **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** | From you | Vital interest:  To enable us to pass relevant information to Police Scotland should we have the need to report you as a missing person. |
| **Information on any offences or criminal convictions relating to you** | From you or other agencies (as detailed in Appendix 2) | Necessary to protect the vital interests:  To complete a risk assessment and safety planning to ensure your safety and that of others. |
| **Details of anyone who is a risk to you (e.g name, date of birth, address, sex and relationship to you)** | From you or other agencies (as detailed in Appendix 2) | Vital interest:  To complete a risk assessment and safety planning to ensure your safety and that of others.  To be able to provide you with tailored support that meets your needs. |
| **Information on the criminal convictions, including any bail conditions of anyone who is a risk to you** | From you or other agencies (as detailed in Appendix 2) | Necessary to protect the vital interests:  To complete a risk assessment and safety planning to ensure your safety and that of others.  To be able to provide you with tailored support that meets your needs. |
| **Other agency involvement** | 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.  To be able to provide you with tailored support that meets your needs. |
| **Information on your individual support needs (e.g. needs relating to safety and housing)** | From you | Legitimate interest:  To compile a support plan which is tailored to your individual support needs. |
| **Information on referrals we have made to other agencies with your agreement** | From you | Legitimate interest:  To be able to provide you with tailored support that meets your needs. |
| **Information on your children (e.g. names, ages and whether they live with you)** | 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.  To be able to provide you with tailored support that meets your needs. |
| **Basic information on the abuse you have experienced** | 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.  To be able to provide you with tailored support that meets your needs. |
| **Court and trial information (e.g trail dates and outcomes)** | From you or other agencies (as detailed in Appendix 2) | Legitimate interest:  To be able to support you through the court process at relevant stages and keep you up-to-date with proceedings. |
| **CCTV Images** | CCTV system in refuge | Legitimate interests  For the prevention and detection of crime against service users, staff and the property.  To ensure the safety of all residents and staff. |

Who we may share your information with (Appendix 2)

In providing our services, ABWA will normally only share personal information with another agency/organisation with your permission. Agencies that we may need to share information with (to ensure we meet your best interests and support you the best we can) are:

* Other Women’s Aid groups
* Health (Health Visitor, GP, Psychologist, Psychiatrist, Mental Health Services, CPN)
* Argyll & Bute Council and other local authorities (Housing, Social Work Children and Families, Social Work Adult Services, Social Work Criminal Justice)
* Police Scotland
* VIA (Victim Information and Advice)
* The Job Centre
* Department for Work & Pensions
* Argyll & Bute Rape Crisis
* Safe, Secure and Supported at Home
* CAB
* Homestart
* Family Support in Argyll & Bute
* Addiction Services
* The Foodbank