

Privacy Notice – Intelligence Mapping - PARCS

Portsmouth Abuse and Rape Counselling Service

Portsmouth Area Rape Counselling Service (PARCS, part of **Family Action**) is a registered charity (Charity Commission number 264713) and will be the data controller for all data processing activities covered in this notice.

Our Commitment

PARCS/Family Action is committed to protecting your personal data and respecting your right to privacy and security. We want you to be clear about when we collect your data and not do anything you would not reasonably expect us to do with your personal data. This notice is to help you understand what personal data we collect, how we use it and how we store it.

PARCS/Family Action adheres to the requirements of the Data Protection Act (2018), UK GDPR and the General Data Protection Regulation 2016/679 (GDPR).

Should you have any questions relating to this notice or our processing of personal data, please email dataprotection@family-action.org.uk or contact us at 34 Wharf Road, London N1 7GR.

Under the Data Protection Act (2018), Family Action are registered with the Information Commissioner to process personal information and we act as data controllers. We will only process information for the purpose for which it was provided and in accordance with the regulations in the Act and our joint control agreement.

It is the nature of the work we do that we may need to collect sensitive information regarding health, social circumstances or ethnicity referred to as 'special category data' in data protection law. Wherever such data is processed we will seek your explicit consent to process this. You have the right to withdraw your consent to this processing at any time, however, if consent is withdrawn this may affect the planning of services to support and improve outcomes for you and your family.

When do we collect your information?

We may collect information about you at a number of stages in your use of our service, for example first call back.

What personal information do we record?

Throughout your engagement with us, our team will record information about you along with the information you choose to share. We can offer you a service if you do not wish to share the details listed below. Your mobile number will be stored on our system unless you request this to be removed.

The information we collect from you will include:

Information about you:
Name & Address
Date of Contact with PARCS
Contact Telephone (Mobile)
Age
*Ethnic Origin
*Gender
*Sexuality
*Disability
*Religion (or belief system)
*Reason for contact with PARCS
Issues/Concerns
How you heard about the service
Where we have signposted you to

* **Special Categories of Data** - due to the service we provide, some of the data we collect is sensitive. Information relating to Health, Ethnicity and any specific requirements you may have are considered 'Special Categories of Data', we are required to take extra care when handling this information.

Who do we share your information with and why?

Within the service your records will be accessible by staff/volunteers for the purposes of:

- Administration – our team may use your records to make contact with you, for example to offer your further support
- Supervision – workers may discuss their work with their peers and manager.
- Quality Assurance and audit – PARCS/Family Action may look at records to ensure that the service is working in line with legislation and the standards required by our regulators and commissioners.
- Investigation of complaints or allegations

We will not share any information about you *outside* of PARCS at Family Action unless it is necessary to:

- prevent serious physical harm to a person
- prevent loss of human life
- protect public health (e.g. notification of a disease)
- safeguard vulnerable adults or children (including unborn children)
- respond to an emergency
- protect national security (e.g. concerns of terrorist activity)
- fulfil an obligation which requires us by law to share information

e.g.

- for a Child Practice Learning Review (previously known as Serious Case Review)
- in response to a request from the Crown Prosecution service for information to support a prosecution
- in response to a request from the Police for information to support a criminal investigation or to enable public protection

In these circumstances we would share only the information necessary and would usually inform you of the need to share information, unless doing so would put you or others at greater risk of serious harm.

Retention

Information we hold about you will be held for 7 years after your final contact with PARCS, with some exceptions, please see the table below.

Adults Requests for Support, Service Users Records, Safeguarding Referrals,	7 Years from date of application to use the service	After 7 Years – Destroy Data
Records of concern in relation to potential historic child abuse allegations	Retain on file until client is 75yrs	After 75yrs – Destroy Data
Childrens Requests for Support, Service Users Records,	7 Years from date of application to use the service	After 7 Years – Destroy Data
Child Protection	Retain on file until client is of normal retirement age	After 68yrs – Destroy Data

Exceptions There are some situations where records need a longer retention period. For example, if:

- the records provide information about a child's personal history, which they might want to access at a later date – (this can be related to some of the PARCS services)
- the records have been maintained for the purposes of research
- the information in the records is relevant to legal action that has been started but not finished
- the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

Commented [CM1]: This comment is incorrect when you view the 75 years below.

Change the sentence to state information we hold about you will be held for 7 years with some exceptions (please see table below). That way it is clear.

Sharing & Disclosure

Your information will only be accessed by staff who need to do as part of their role.

Within Family Action:

- Staff working at PARCS
- Senior managers, (as required);

Outside of the service:

- Sensitive personal data will not be shared with anyone outside of Family Action without good reason.

Legal Basis on which your Data will be processed:

Legal Basis: Legitimate Interests – Article 6 (f) – Processing is necessary for the purposes of legitimate interest pursued by the controller or by a third party.

Special Category data: – will be processed under Article 9 (g) – Processing is carried out for Reasons of substantial public interest (with a basis in law)

Substantial public interest condition set out in DPA 2018 – Condition 18. Safeguarding of children and individuals at risk

How we store your personal information

Written notes may either be securely filed in a locked filing cabinet (or equivalent) and/or stored in an electronic storage form.

Laptops/Computers: Information about you in electronic files and data systems that are password protected.

Mobile phone: We store your contact telephone number to make contact with you throughout the time that you are accessing the services provided by PARCS, if you have given us permission to contact you in this way. We use Family Action mobile phones that are passcode protected.

Email: your email address will be stored and used for contacting you in relation to your work with PARCS, if you have given permission for us to contact you in this way.

Website: PARCS/Family Action website uses cookies. We cannot use this information to find out further personal information about you.

Contacting and Communication

We are obliged to protect any confidential information we hold about you and we take this very seriously, it is imperative that you let us know immediately if you change any of your contact details.

We may contact you using text messages to your mobile phone in the event that we need to notify you about appointments and other services, if we have your consent. It is important that we have your up-to-date details, this is to ensure that we are contacting you and not another person.

Rights

The GDPR legislation provides you with a number of rights in relation to your personal data.

- **Right to Withdraw Consent:** Where you have consented to our processing of your data, you have the right to withdraw that consent at any time.
- **Right to Access:** You have a right to obtain copies of the information that we hold about you. In the interest of security, you will need to prove your identity before any information can be shared with you. We may not be able to disclose all of the information you request, for example if it contains information about other people or there are legal reasons for us to withhold the data.

- **Right to Rectification:** We try to ensure the data we hold about you is accurate and up-to-date. If you believe our data is inaccurate, please tell one of our staff who will make any necessary amendments.
- **Right to Erasure or the Restriction of Processing:** In certain circumstances, you can ask us to remove your data from our systems.
- **Right to Complain:** If you are concerned about the way we have processed your personal information, you have the right to complain to the Information Commissioners Officer (ICO). To do so please refer to the ICO website <http://ico.org.uk>

Please contact data.protection@family-action.org.uk if you have any queries regarding data.

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