



Privacy Notice

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?

Scotland's Domestic Abuse and Forced Marriage Helpline is a 'data controller' and gathers and uses certain information 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).

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, Scotland's Domestic Abuse and Forced Marriage Helpline will occasionally 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:

- We believe a child or a vulnerable adult is at risk of serious harm
- We believe that an individual is in immediate danger and that there is a potentially life threatening situation
- We receive a court order requiring us to share information or are required to do so by legislation
- We receive information about acts of terrorism, bomb warnings, or other threats to life
- You threaten the safety of our staff or the delivery of our service

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 which is only accessed by staff and volunteers at Scotland's Domestic Abuse and Forced Marriage Helpline. Paper copies of your information may also be stored; this will be done securely and only accessed by relevant staff and volunteers of Scotland's Domestic Abuse and Forced Marriage Helpline. 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

Scotland's Domestic Abuse and Forced Marriage Helpline 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 any Helpline Call Handler by phone or email.

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

Please contact Scotland's Domestic Abuse and Forced Marriage Helpline either by email or telephone 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 Scotland's Domestic Abuse and Forced Marriage Helpline 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

Scotland's Domestic Abuse and Forced Marriage Helpline 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 Lydia Okroj, Helpline Manager, by email to lydia.okroj@womensaid.scot. 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.

*Breach Management Plan in development 07/01/2019

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
Your name	From you	<p>Legitimate interest:</p> <p>Your first name, if you choose to give it, will be used as part of a unique identifier that allows us to identify you in our system.</p> <p>We may also collect your full name to enable us to contact you or to enable us to pass relevant information to other agencies if a referral is agreed or required.</p>	Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.
Your Local Authority area	From you	<p>Legitimate interest:</p> <p>Your Local Authority, if you choose to give it, will be used as part of a unique identifier that allows us to identify you in our system.</p>	Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.
Your full address	From you	We may collect your full address to enable us to contact you if you request information by post or to enable us to pass relevant	<p>After two years, information about referrals made to statutory agencies are archived.</p> <p>If the reason we collected your address was to send you a letter, we</p>

		information to other agencies if a referral is agreed or required.	will dispose of this securely immediately after the letter has been sent.
Your phone number	From you or from our telephone caller ID	<p>Legitimate interest:</p> <p>The last four digits of your phone number will be used as part of a unique identifier that allows us to identify you in our system.</p> <p>We may collect your full phone number to enable us to contact you or to enable us to pass relevant information to other agencies if a referral is agreed or required.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.</p> <p>If we collect your full phone number for the purpose of calling you back, this will be disposed of securely immediately after the call has been made.</p>
Your email address	<p>From you</p> <p>From an email you send us</p>	<p>Legitimate interest:</p> <p>We may collect your email address to enable us to contact you or to enable us to pass relevant information to other agencies if a referral is agreed or required.</p>	<p>If we collect your email address for the purpose of providing email support, this will be securely deleted up to one month after this contact has ended.</p> <p>Information about referrals made to statutory agencies are archived after two years.</p>
Relevant information on the abuse you have experienced and any additional issues that are affecting you	From you	<p>Legitimate interest:</p> <p>To provide you with tailored support that meets your needs.</p>	Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years,

		To provide anonymised information to our funders about the types of calls we receive.	<p>information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
Information on your individual support needs (e.g. needs relating to safety and housing)	From you	<p>Legitimate interest:</p> <p>This will help us to provide you with tailored support that meets your needs.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
Ethnicity, cultural and religious information, nationality, sexuality, and age	From you	<p>Legitimate interest:</p> <p>To understand your individual needs and to be able to provide you with tailored support.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years,</p>

		<p>To provide anonymised diversity information our funders.</p> <p>AND</p> <p>Explicit consent:</p> <p>We will seek your explicit consent ensuring that it is a clear and specific statement of consent.</p>	<p>information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
General health information and information on any addictions	From you	<p>Legitimate interest:</p> <p>To understand your individual needs and to be able to provide you with tailored support.</p> <p>To provide anonymised diversity information our funders.</p> <p>AND</p> <p>Explicit consent:</p> <p>We will seek your Explicit consent ensuring that it is a clear and specific statement of consent.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
Other agency involvement	From you or other agencies (as detailed in Appendix 2)	<p>Legitimate interest:</p> <p>This will help us to provide you with tailored support that meets your needs.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years,</p>

			<p>information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you or another agency share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
Information on referrals we have made to other agencies with your agreement	From you	<p>Consent:</p> <p>We have your consent so we can provide you with tailored support to meet your needs.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years, information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
Information on your children (the number of children you have and their ages)	From you	<p>Legitimate interest:</p> <p>This will help us to provide you with tailored support that meets your needs.</p>	<p>Personal information is kept for a period of up to two years. After this, the information held in our system is anonymised. After two years,</p>

		<p>To provide anonymised diversity information to our funders.</p>	<p>information about referrals made to statutory agencies are archived.</p> <p>Paper notes containing details of our contact are kept for no longer than one month and are then securely disposed.</p> <p>If you share this information with us by email, the email will be kept for no longer than one month and then deleted.</p>
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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:

- Women's Aid groups
- Emergency services (ambulance, police, fire and rescue)
- Local authorities (Housing, Social Work Children and Families, Social Work Adult Services)
- Police Scotland
- Rape Crisis Scotland
- Men's Advice Line
- Forced Marriage Unit
- Language Line