



# Privacy Policy

The safety of your personal information is something that we take very seriously and we are committed to protecting and respecting your privacy.

You may have heard of the General Data Protection Regulation (or GDPR); if you haven't, it is legislation regarding how personal data can be stored and used and was effective from 25th May 2018. This updated Privacy Policy has been written in accordance with GDPR.

This Privacy Policy explains how we use, process and protect your personal information for the purposes of providing support to service users, training professionals, campaigning and taking an active role in safeguarding arrangements in the West Midlands.

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

If you have any questions about what we have set out below then please contact us at [data protection email address].

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## How do we collect personal information?

Personal information is anything that can identify you, for example your name, address, personal details in a client referral form, or email address for a newsletter subscriber. We collect information about you if you have:

- [Applied to us](#) for a job or volunteer / student / counsellor placement
- Signed up to a [training](#) event
- Accessed our [website](#)
- [Referred](#) yourself to us for support
- [Been referred](#) to us by another service

### Applied for a job or placement with us

When you apply for a role you will fill in a standard form which sets out your contact details, some personal information about your career and / or education history, and your information in support of your application. This will include a statement about any criminal convictions or cautions you may have. We process your information to carry out a recruitment / placement exercise.

Once working with us you will continue to share information with us, and we will record information about you, including relevant health information (e.g. if you take sick leave, maternity leave, disclose a disability), financial information (salary / pension / NI contributions etc.) and information you might share in supervision. We will process this information to manage and support you in your work, and to comply with employment and other legal requirements and any contractual relationships we have in place (for example with external educators).

### Signed up to training

You may have supplied your information to directly or via your employer. We will process your information for legitimate interests: in order to deliver the training, and follow up with you for feedback on the event.

### Accessed our website

Whilst using our website we collect anonymous information about your browsing session to help us improve our website.

We use a tool called Google Analytics to collect this data. All of the data is stored securely on Google's servers. In order to track your browsing across sessions, Google analytics will place a 'cookie' on your machine (a small text file that websites use to track and remember information across several browsing sessions). You can tell your web browser not to accept cookies if you don't your data to be collected in this way (refer to your web browser's help file for more information).

For further details on Google Analytics, and the Google Analytics privacy policy, please [visit the Google Analytics website](#).

## Referred yourself to us

You can refer yourself to us by calling our general number or emailing our referrals email address. As you would expect, we will then take details from you including your name, contact details, your current situation, and some monitoring information like your age, ethnicity, and nationality. We keep all of this information securely on our purpose-built database, and share it internally so that you can receive the support you need from us.

You can ask to see your file at any time.

The legal basis for us to process your information is your consent.

## Been referred to us by someone else

We ask referrers to seek your consent before referring you to us. They will fill out a form to give us your contact details, monitoring information, personal circumstances, and support needs. We process this information onto our database. We will then call you to check that you are happy to receive support from us, and then link you up with a support worker.

You can ask to see your file at any time.

The legal basis for us to process your information is your consent.

# How do we share your information?

We believe that to trust another person with private and personal information is a significant matter. When you give us information in confidence, we will only use it for the purpose you share it, and will only share it with other people in the specific situations described below.

## Consent

You may ask us to share your information, for example if you ask us to refer you to another agency, or write a letter of support or reference for you.

## Information sharing agreements

Some of our services are run in partnership with other agencies, and so information will be shared with them as part of running the service. Also, we share information for safeguarding children, vulnerable adults and people who are experiencing domestic violence. We are currently having our service independently assessed by researchers with the University of Birmingham. There are information sharing agreements in place for each of these arrangements, which you can ask to see at any time by contacting our Data Protection Lead.

## Risk of serious harm

We have clear safeguarding policies in place which deal with how and why we would share information where there is a risk of serious harm. We would ask for consent first, and only share information without your consent if we feel under a duty to share it because of the risk, or exceptionally if there is no time to get your consent, or if we are legally prevented from speaking to you about it.

## Required by law

HMRC, regulators and other authorities may require reporting of processing activities in certain circumstances, and HMRC may audit our financial books and records.

If we receive information about a terrorist threat then we are legally required to report this to police.

If a local authority is acting under its safeguarding powers, then it can legally require us to share information.

If there is a court order requiring us to produce documents, then we must comply.

## Data processors

Professional advisors may have access to Anawim data in the course of performing their duties (these may include lawyers, auditors, insurers, bankers, accountants, HR and IT support). We also use external providers for email & webhosting.

Where we do share data in this way, we have contracts in place which protect the security of your personal data and ensure that your data is only processed for specific purposes and in accordance with our instructions.

## How do we look after your information?

Anawim has taken suitable measures to safeguard and secure data collected. These are compliant with the General Data Protection Regulation (GDPR).

In the unlikely event that your personal information is compromised, you will be informed as required in the GDPR.

## How long do we keep your information?

We will only keep personal data for as long as necessary to fulfil the purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. In deciding how long to keep data, we consider:

- a) The amount, nature, and sensitivity of the personal data
- b) The potential risk of harm from unauthorised use or disclosure of personal data
- c) The reason why we are processing the personal data and whether it is possible to achieve those ends through other means
- d) The applicable legal requirements

Description of data	Period to keep
Information about clients, and people who are referred to us	Six years from the date we last had contact with you
Unsuccessful job applicants	Six months from the date of the recruitment decision
Information about staff, including counsellors who work with us	Six years from the date you finish working with Anawim
Information about volunteers and students	Six years from the date the placement ended

Description of data	Period to keep
Personal information within the finance records, for example invoices, or if a bank transfer discloses the name of the transferor	Six years from the end of the financial year to which the record relates
Name and contact details for collaborators / contractors who work with Anawim	Six years after last work carried out
Information supplied to us via email, including the contact form on our website	Six years after the receipt of the email

## Your rights

Under certain circumstances, you have rights under data protection laws. These include the right to:

- a) Request access to your personal data
- b) Request correction of your personal data
- c) Request erasure of your personal data
- d) Object to processing of your personal data
- e) Request restriction of processing of your personal data
- f) Request transfer of your personal data (where it has been processed using automated means, which does not apply to us)
- g) Withdraw consent for processing

These rights are set out fully [here](#). You always have the right to complain to the Information Commissioners Office ([here](#)).

To exercise any of these rights, email us at [referrals@anawim.co.uk](mailto:referrals@anawim.co.uk)

## Where in the world does your information go?

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to personal data, so European law has forbidden transfers of personal data outside of the EEA unless the transfer meets certain criteria.

We make use of some third party service providers based in the United States so that processing of your personal data will involve a transfer of data outside the EEA. In order to protect you, such transfers only take place with providers who have signed up to the EU –US Privacy Shield: These are:

- Google (provides Google Analytics on our website) certificate [here](#)

There is information about the Shield [here](#).

## How to contact us

Anawim Women Working Together  
228 Mary Street  
Balsall Heath  
Birmingham  
B12 9RJ  
Telephone: 0121 440 5296  
Email: [referrals@anawim.co.uk](mailto:referrals@anawim.co.uk)

Our Data Protection Lead is Joy Doal and you can contact them on [joydoal@anawim.co.uk](mailto:joydoal@anawim.co.uk)

## Version

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