



*Definition: A policy sets out the **strategic direction** of the organisation as decided by senior management. A policy will lay out a destination, but won't give any direction on how this is to be executed. For example a policy would contain a statement such as:*

*'Time and attendance will be tracked for all staff and contractors in a clear and consistent way', but wouldn't give any indication as to how that should be done.*

|                          |                         |
|--------------------------|-------------------------|
| <b>Policy Name:</b>      | <b>Privacy Policy</b>   |
| <b>Policy Owner:</b>     | <b>Sabrina Holyhead</b> |
| <b>Date Created:</b>     | <b>01.09.2021</b>       |
| <b>Next Review Date:</b> | <b>May 2027</b>         |

**1. Policy Description:**

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.

**2. Purpose of the Policy:**

The primary purpose of the Privacy policy is for subjects to understand the ways in which Anawim use, process and protect their personal information and to understand their rights.



For women let down by the system.

For women with nowhere else to turn.

For women who've suffered.

Text ANAWIM to 70085 to make a £5 donation.  
To make a referral, visit [www.anawim.co.uk/what-we-do/make-a-referral](http://www.anawim.co.uk/what-we-do/make-a-referral)

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### 3. Scope:

#### **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 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).

#### **Criminal conviction data**

We will only collect criminal conviction data where it is appropriate given the nature of the services you are to provide to us and where the law permits us. This data will usually be collected during contract negotiation, however, may also be collected during your engagement. We use criminal conviction data to determine your suitability, or your continued suitability for the engagement. We rely on the lawful bases of legal obligation and legitimate interests to process this data, namely our duty to comply with safer recruitment practices and to check DBS barred lists.

- **Signed up to training**

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



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- **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 the data is stored securely on Google's servers. 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 assign 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.

- **Entered into a professional contract with us**



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We keep several categories of personal data about you in order to carry out effective and efficient processes. We keep this data in a file relating to each contractor and we also hold the data within our computer systems, for example, our accounts systems.

- **Gift Aid Donations**

By signing up to Gift Aid you agree that:

- You want to Gift Aid your current donation and any donations you may make in the future or have made in the past to Anawim.
- You are a UK taxpayer and understand that if you pay less Income Tax and/or Capital Gains Tax than the amount of Gift Aid claimed on all my donations in that tax year it is your responsibility to pay any difference.
- You will notify Anawim of any change in your personal circumstances, such as name and a tax status

By signing up to Gift Aid you are appointing Anawim to act as an agent to sell your donated goods; therefore, you are arranging for Anawim to sell them on your behalf and will give the sale proceeds (minus any commission charged) to Anawim as a gift aid donation. You have a right to keep all the proceeds from the sale of your goods and can choose to donate all or part of the amount.

If the cumulative net sales proceeds are less than £100 in a tax year, Anawim does not have to notify you before claiming gift aid on the amount. Anawim will contact you to notify you once the sale proceeds have reached over £100, giving you the opportunity to decide whether to donate the proceeds to Anawim. You will have 21 days to inform Anawim.

An end of each tax year a letter will also be sent if the cumulative proceeds are over £20, and if we have not contacted you within the past 3 years.

### **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.



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### **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.

### **Failure to provide data**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering a contract with you or performing the contract that we have entered.

### **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 it is required by law, or directed by a court, or if the benefits to a child or young person that will arise from sharing the information outweigh both the public and the individual's interest in keeping the information confidential.

### **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.



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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 while 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 guidelines.

#### **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

Please see Data protection policy for further details.

#### **Your rights**

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

- a) Request access to your personal data



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- 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 may make use of some third-party service providers based in other countries so that processing of your personal data will involve a transfer outside the EEA. 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](#).



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**4. Monitoring and Review:**

This policy is reviewed on an annual basis.

**Acronyms:**

| Acronym | Meaning                 |
|---------|-------------------------|
| COO     | Chief Operating Officer |
| CEO     | Chief Executive Officer |
|         |                         |

**Sign Off:**

| Name:             | Role:    | Date:                     | Version No: |
|-------------------|----------|---------------------------|-------------|
| SMT               | Review   | May 2024                  | V4.0        |
| Board of Trustees | Sign off | May 2024                  | V4.0        |
| Donna Lewis       | Sign off | 15 <sup>th</sup> May 2025 | V5.0        |
| SMT               | Sign off | 13 <sup>th</sup> May 2026 | V6.0        |



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