

Stockport Women's Centre

Effective Women's Centre Partnership Privacy Notice

This Privacy Notice gives you detailed information on why and how your personal information is collected when you receive support or other services from Stockport Women's Centre's and/or provide your responses to the Women's Risk Needs Assessment ("WRNA") and/or the Gendered Wellbeing Assessment ("GWA").

This Privacy Notice applies to the processing your personal information in this context by:

- Stockport Women's Centre (the "**Women's Centre**");
- The University of Birmingham ("**UoB**"); and
- The JABBS Foundation ("**JABBS**").

Unless we say otherwise, any reference to "we", "our", or "us" in this Privacy Notice, we are referring to all these organisations. We are all working together to provide the WRNA and the GWA (as detailed further below), and we are all committed to keeping your personal information safe and meeting our responsibilities under privacy law. Given that this is information that can be used to identify you, we want you to be confident that we are using it responsibly. This Privacy Notice explains how we use your personal information, how we keep it secure, and how you can let us know if you would like us to change how we manage it.

NB For a shorter, more high-level version of this Privacy Notice, please visit our summary document [here](#)..

1. [Who we are](#)
2. [What personal information we may hold about you](#)
3. [Where we obtain your personal information](#)
4. [How we use your data](#)
5. [Our lawful bases](#)
6. [Retaining your personal information](#)
7. [How we share your personal information](#)
8. [International data transfers](#)
9. [How we keep your personal information safe](#)
10. [Your rights](#)
11. [Other websites](#)
12. [Updates to this Notice](#)
13. [Contact us](#)

1. Who we are

Stockport Women's Centre is a charity (charity number is 1119969). the Women's Centre will use the information you provide for the WRNA and/or GWA as part of the support and services that it provides to you, and to better understand your potential needs and strengths, as well as the interventions or treatment options that might be appropriate for you in light of those needs and strengths.

UoB has undertaken significant work in developing WRNA and the GWA and will carry out further research in relation to the casework and models of care that these assessments use.

JABBS is a charity (charity number: 1128402) wishing to (among other things) support (i) women involved with, or at risk of contact with, the criminal justice system and (ii) organisations that address those women's needs, JABBS helped create and continues to fund the WRNA and the GWA.

We are all working together to make the WRNA and the GWA available to Women's Centres to help provide a better service to women who need support (either because they have been impacted by the criminal justice system or for other reasons). We want to improve the circumstances of women, not only by providing them with the support that they need, but also by carrying out research.

If you have questions regarding your personal information or its use, please contact us using the details set out in the 'Contact us' section below.

2. What personal information we may hold about you

Personal information is any information that relates to an individual but does not include anonymised data such as overarching statistics where no one person can be identified.

We collect the following personal information about you:

- Identification information, such as your name;
- Contact information, such as your email address, telephone number and home address;
- Official information, such as your national insurance number and NHS number;
- Details of your GP and emergency contact;
- Details about your friends and personal life;
- Details of your employment and financial needs;
- Details of housing safety;
- Information about anger and hostility;
- Information about your mental health history (including depression, PTSD and psychosis screening);
- Details of any abuse you may have suffered as a child or adult, including physical and sexual abuse;
- Details of any substance abuse (current and historic) and/or gambling addiction;
- Information about any parental stress relationship dysfunction or family conflict you may be dealing with;
- Information about education, family support and involvement and/or self efficacy
- Criminal offence information (including details of your current offence(s) and your version and/or view of the offence and your criminal history).
- Demographic data, including age, gender, religion, race, disability and other demographic and protected characteristics information
- Case notes and references

If you contact us, for example to provide your feedback or other communications, we may keep a record of that feedback and correspondence, as well as your name and contact details.

Sensitive Personal information

Under data protection legislation, certain personal information is considered more 'sensitive' (e.g., information relating to race, religion, political affiliation and health, as well as information relation criminal offences). This is also known as 'special category data'. The nature of the WRNA and GWA, as well as the work that we do, means that we collect various types of special category data about you, including in relation to your:

- Health (such as your mental health history, details of substance abuse, addiction, details of disabilities and/or any other health concerns that may be relevant);
- Race and religion (as part of the demographic data we collect);
- Sex life and sexual orientation, where relevant to your circumstances.

We will also collect criminal offence information in relation to you, including in relation to any current offence(s), case notes and references and/or your criminal history.

3. Where we obtain your personal information

We collect and retain personal information about you that you have given us when you receive support from the Women's Centre: as part of that support, your caseworker will ask you specific questions, including questions that have been developed as part of the WRNA and/or the GWA. We might also collect your personal information when you contact us directly via email, phone, in person or by post.

We may also collect personal information about you from third parties, including:

- as part of referral forms about you that are provided to us so that we can provide you with support; and
- from government departments such as the Ministry of Justice ("MoJ") or HM Prison and Probation Service ("HMPPS") where necessary in order to enable us to carry out research on the impact of our work on women over time (though we will carry out this research on a pseudonymised basis where we can, meaning that will mask your identification information if at all possible).

4. How we use your personal information

The purposes for which we use your personal information will differ depending on the organisation:

- In the case of the Women's Centre:
 - to provide you with support and manage your case, including by suggesting interventions that might be most appropriate for you in light of your strengths and needs
 - to learn from your experience to develop and improve our work
 - in very limited cases, to prevent or detect crime (for example in relation to people that you mention when you respond to the questions asked as part of the WRNA and/or GWA).
- In the case of UoB:
 - to carry out research on the impact of our work and the casework and models of care that the WRNA and GWA seek to provide, on a pseudonymised or anonymised basis wherever possible (including, where appropriate, by sharing your information with government departments like the MoJ and HMPPS)
- In the case of JABBS:
 - to facilitate the Women's Centre's work, including through technical support of software and data quality management
 - to anonymise your data so that we can understand broader trends relating to women affected by the criminal justice system, and pursue policy change accordingly to further our aims and our work.

- We will all process your personal information to:
 - ensure that we can keep our database(s) accurate, relevant and up to date; and
 - ensure that we comply with our legal obligations and/or are able to exercise or defend our legal rights.

5. Our lawful bases

We will only use personal information when the law allows us to (i.e., where we have a ‘lawful basis’). Again, the lawful bases that we rely on will depend on our particular purposes:

	Purpose	Lawful Basis
The Women’s Centre	Provide you with support and manage your case, including by suggesting interventions that might be most appropriate for you in light of your strengths and needs	Legitimate interests (including our interests in providing our services to you and improving our work based on your experiences)
	Learn from your experience to develop and improve our work	Legitimate interests (including our interests in providing our services to you and improving our work based on your experiences)
	In very limited cases, to prevent or detect crime	Legitimate interests (including our interests in providing our services to you and improving our work based on your experiences)
UoB	Carry out research on the impact of our work and the holistic casework and whole system models of care that the WRNA and GWA seek to provide	Perform a task carried out in the public interest (including the public interest of carrying out research into the difficulties faced by women and improving their circumstances), or in the exercise of our official authority
JABBS	Facilitate the Women’s Centre’s work, including through technical support of software and data quality management	Legitimate interests (including our interests in providing services)
	Anonymise your data so that we can understand broader trends relating to women affected by the criminal justice system, and pursue policy change accordingly to further our aims and our work.	Legitimate interests (including our interests in furthering our aims and pursuing policy change)

All	Ensure that we can keep our database(s) accurate, relevant and up to date; and	Legitimate interests (in the case of the Women's Centre and JABBS), including the interests of maintaining accurate records and providing services appropriately; and Perform a task carried out in the public interest (in the context of UoB).
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Where we process sensitive personal information (as described above), we may rely on the condition that the processing is necessary (as relevant in each case) for:

- health or social care purposes;
- the provision of confidential counselling, advice or support or of another similar service provided confidentially
- the purposes of (i) protecting you from neglect or physical, mental or emotional harm or (ii) protecting your physical, mental or emotional well-being;
- the prevention or detection of crime (for example, if we need to report a crime);
- in the case of UoB and JABBS, scientific research purposes or statistical purposes.

We do not carry out any automated decision-making using personal information which produces legal effects or otherwise significantly affects individuals.

To the extent that we would like to use your personal information for research purposes, we will obtain your consent as part of, and in accordance with, appropriate research ethics and governance processes, which are separate from data protection. For more information, please see the research consent form, which will be provided to you separately. Please note that even if you don't provide your consent to participate in our research, your personal information will still be used as part of the WRNA and the GWA to provide you with support and/or manage your case.

If we do rely on your consent from a data protection perspective, we will make clear about the purposes for which we are relying on that consent. In these cases, you can withdraw your consent and request us to stop processing your personal information for research at any time by emailing us using the details set out in the 'Contact us' section below (or other details as provided to you from time to time).

6. Retaining your personal information

We will not keep personal information for longer than necessary, and the appropriate retention period will vary according to the intended purpose for which we collected the personal information.

The main criteria we use to determine the retention period of personal information is the nature of our work and the research that we do (in other words, the purposes for which we're collecting your information). A key part of this research involves understanding the impact of our work on women over a long period of time (often many years), and so we may need to retain your personal information for at least that period (however, as we've said elsewhere, we will try and make sure that we pseudonymise or anonymise your information whenever we can, so that you are only identifiable where absolutely necessary).

Other criteria that we might take into account include: (i) the respective statutory retention period; (ii) our relationships with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators. After expiration of that period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract, the initiation of a contract or to protect or defend our position or that of a third party.

If you have any questions about our retention periods, please email us using the details in the 'Contact us' section below.

7. How we share your personal information

We may share your personal information with third parties, including the following:

- with each other, to the extent necessary for the purposes set out above;
- with government bodies such as the MoJ or HMPPS (on a pseudonymised or anonymised basis if possible, or otherwise to the minimum extent necessary) to carry out research on the impact of our work on women over time;
- with contractors, suppliers, or other third parties that provide services on our behalf (such as platform host providers);
- as part of a sale, merger or acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding;
- pursuant to a subpoena, court order, or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties;
- with law enforcement authorities if we need to report a crime;
- with our professional advisors, lawyers, accountants and auditors; or
- with your consent or as otherwise disclosed at the time of data collection or sharing.

8. International data transfers

We do not currently transfer personal information we hold to a country outside the UK. If we do so, we will take steps to ensure that your personal information is protected in accordance with appropriate safeguards, especially where the recipient country is not considered to be adequate under UK law. In particular, we will rely on the appropriate safeguards under data protection legislation, such as standard contractual clauses approved by the UK Government to protect your personal information.

9. How we keep your personal information safe

To protect your privacy we will make sure your personal information is kept securely and disclosed only to relevant organisations or representatives who need to access it to perform their roles. Further, where we can carry out our work with anonymised or pseudonymised data (where your identity is either masked or removed entirely) we will do so, so that we are only processing your personal information where absolutely necessary.

Please note that while we seek to use appropriate organisational, technical and administrative measures to protect personal information within our organisation, unfortunately no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contact us" section below.

10. Your rights

Under certain privacy laws, you have rights relating to your personal information. You may have a right to the following:

- to request access to the personal information we hold about you;
- to request that we rectify or erase your personal information;
- to request that we restrict the processing of your personal information;
- to object to our processing of your personal information in certain circumstances;
- under certain circumstances, to ask us to transfer personal information about you that you have provided to us to you or to a third party; and
- where we previously obtained your consent, to withdraw consent to processing your personal information.

To exercise these rights, contact us via the “Contact us” section below. Please be aware that we may not apply these rights to your data under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

Additionally, you have the right to lodge a complaint against us, which you can do by contacting the supervisory authority in your country of residence. In the UK, this is the Information Commissioner’s Office at www.ico.org.uk/make-a-complaint.

11. Other websites

We may, from time to time, provide you with links to other resources or websites. Please note that when you click on one of these links, you are entering another website for which we have no responsibility (even if you access the website via a link to one of our websites). We encourage you to read the privacy notices on all such websites.

12. Updates

This Privacy Notice may change from time to time – for example, to take into account changes at the Women’s Centre, UoB and/or JABBS, or to reflect changes in regulation or legislation.

Updates to this Notice will be posted on this page – please check back from time to time. We will also use reasonable efforts to inform you of any significant changes by email where appropriate.

13. Contact us

If you have any questions or concerns about this Privacy Notice or the way in which we handle your personal information, please contact us using the following details:

	Email address	Postal address
Women’s Centre	admin@stockportwomenscentre.co.uk	39 Greek Street Stockport SK3 8AX
UoB	dataprotection@contacts.bham.ac.uk	The Information Compliance Manager Legal Services The University of Birmingham Edgbaston

		Birmingham B15 2TT
JABBS	admin@thejabbsfoundation.co.uk	PO Box 16067 Birmingham B32 9GP