**West Midlands Anti-Slavery Network Privacy Notice**

This Privacy Notice sets out how we retain and use your personal data to help us carry out our work in collaboration with partner organisations to end modern slavery, human trafficking and exploitation.

We will always protect your data and keep it secure, and we will comply with current legislation including the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation 2018 (GDPR).

# The type of personal data we collect

We currently collect and process the following personal data:

* Contact details of external stakeholders including name, address, and email address.
* Service user details including names, addresses, dates of birth, national insurance details, National Referral Mechanism details, medical information including prescriptions, legal advice, employment details, perpetrator details, other victim’s details as above.
* Contact details of other organisations and their representatives who have supported the service users eg, representatives from the Police, Local Authorities, Charities etc.
* Contact details of funding organisations.

Some of this information, for example information about your health, is called ‘special personal data’ in the GDPR.

We set out further down when we will process your personal and special personal data and when we will ask for your consent.

# How we obtain your personal information and what it is used for

Most of the personal information we process is provided to us directly by you and is processed by us for one of the following reasons:

* To support victims of trafficking and exploitation
* For the purposes of stakeholder engagement and [to support] members of the network
* To improve outcomes for potential victims of exploitation and provide appropriate care and support

Personal data is also shared with us by referring organisations as follows:

* Service user and perpetrator details are shared by referring agencies and other stakeholders so that we can support victims of trafficking and exploitation.

# When we share your personal data

We may share your information with internal and external stakeholders where you have given your consent. We will never share your information without first obtaining your consent.

# Our lawful reasons for processing your data

Under the GDPR, we must have lawful reasons for processing your data. These are:

1. Your consent – if you are a service user we will ask for your consent before processing your data, including your ‘special personal data’ such as data about your health. You may withdraw your consent at any time – to do so please contact us at the address below.
2. We have a contractual obligation – if we have a contract with you, we may process your information, for example if you have contracted with us to provide a service.
3. We have a legal obligation – we may have a legal obligation to process your data, for example if we are involved in a legal dispute.
4. We have a legitimate interest – we may have a legitimate interest in processing your data, for example if you are a partner of ours and we need to process your contact details.

If we are processing your ‘special personal data’ such as information about your health (see above) then we will also have one of the following additional lawful reasons for processing special personal data:

* 1. Your consent - You may withdraw your consent at any time – to do so please contact us at the address below.
  2. If this is in your vital interests – for example to provide emergency medical care where you are unconscious or otherwise incapable of giving consent to data processing.

# How we store your personal information and keep it secure

Your information is securely stored in Microsoft 365.

We keep personal information and details of service users, internal and external stakeholders and partners for no longer than is necessary (see below). We will then dispose your information by securely deleting and destroying all data and information from our databases.

# How long we keep your personal information

We will keep your information for no longer than necessary and for the following periods:

**Service Users** – Personal information will be retained for a period of no more than 3 years. This allows for NRM processes to conclude.

It also acknowledges the fact that survivors are often traumatised, and may not be ready to fully disclose or seek support on initial engagement with our services. Retention is proportionate and justified in allowed survivors to reconsider their options during this timeframe.

The exception to this rule caters for occasions when the WMASN is made aware of the fact that the survivor is providing evidence to support a criminal prosecution. This could be as both a victim and/or witness. In these circumstances, the service user’s personal information will be retained for a period of 6 years in order to comply with criminal justice disclosure requirements (CPIA 1996).

**Network members** – we will keep this under a rolling review every 12 months. If there has been no contact from the network member during this time, all data will be deleted.

**Grant makers** – 3 years after the end of the grant or as per funders’ requirements.

**Other stakeholders** – if a period of 12 months passes without any contact from the stakeholder, all data will be deleted.

**Emails** – all emails will be deleted after 3 years.

# Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information. This is known as a Subject Access Request.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restrict processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask us to transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

There is no charge for exercising your rights except in limited circumstances. If you make a request, we have one month to respond to you.

# How to contact us or complain

If you have any concerns about our use of your personal information or if you to exercise your rights, please contact us at:

*Business Manager, Donna Pryor*

*Landmark,*

*2 Snow Hill,*

*Birmingham.*

*B4 6GA*

Phone Number:

E-mail: info@westmidlandsantislavery.org

If you are not satisfied with our response, you can raise a complaint with the ICO at:

*Information Commissioner’s Office*

*Wycliffe House*

*Water Lane*

*Wilmslow*

*Cheshire*

*SK9 5AF*

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk