**DATA PROTECTION & GDPR POLICY & PRIVACY POLICY**

Both Parents Matter Cymru & Aegis take Data protection & privacy policies very seriously.

We have strict measures in place to always protect your information.

From first point of contact with us, you will be informed all information is kept confidential and we will never share any of your information, unless required to do so under current law or for safeguarding reasons, but we will always inform you if this has happened.

We use a secure database to capture and store your information which has multilayer protection in place to help prevent unauthorised access. You also confirm the information provided to us and or from us will remain confidential at all times.

If we have reason to believe any breach has taken place, we will contact anyone affected as soon as possible under our duty of care towards you.

For people registering with us to obtain service support, the information about you which we collect is defined by our standard Service User Pack (downloadable from the Home Page).

The charity takes your confidentiality and protection of your data very seriously. We ensure that anything you tell us remains confidential. Your data is stored within GDPR compliant software to which only charity officers have access, via password and authenticator protections.

As part of the process of completing the Service User Pack you are asked to agree to the Confidentially statement on page 1 and this fulfils our obligation for your consent and a lawful basis for processing and storage of your data. You have a right to revoke such consent at any time by notification to the charity of this desire.

We don’t share your information with any third party except with your consent, for example to help you obtain legal aid or representation in Court or to protect you as a victim of domestic abuse. However, we may have a legal obligation to share data without your consent if we believe there is a child protection issue that requires such disclosure, or to protect you or others. We agree to notify you of our decision to share data without your consent at the earliest opportunity if these provisions should apply.

You have a right to request copies of your personal information that we hold. You have other rights under data protection as may be found at the Information Commissioner’s Office.

In registering as a service user or a volunteer with the charity you agree to keep confidential any information about others that is obtained whilst discharging your duties with the charity or that is shared with you by other service users through accessing any of our services (e.g., disclosures on private Facebook pages). You further agree to allow us to use your data in fully anonymised form for academic, research, promotional and other non-commercial uses. Service users are asked to sign their Service User Pack or otherwise confirm their agreement to the charity’s Data Protection & Confidentiality policy and consent to the above notices, as well as confirming that the information you have supplied is true to the best of your knowledge & belief.

**Our contact Details.**

Name: Both Parents Matter Cymru

Address: Office 4, Abacus House, Caxton Place, Cardiff, CF23 8HA

Phone Number: 0333 050 6815

E-mail: feedback@fnf-bpm.org.uk

Reg charity No: 1134723 Company Reg No: 7108520

 **The type of personal information we collect.**

We currently collect and process the following information:

1. Personal identifiers, such as your full name, address, Date of birth, email contact,
2. Names of Children involved in your case, Children’s Date of birth and Address.
3. Details, when possible, of the other party involved in your case but would we not normally have any contact with them, this is for any conflicts.

**How we get the personal information and why we have it**

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

1. To allow our in-house case advisors to provide support to you and offer guidance with your case which may include us helping with court applications and statements.
2. To better understand your situation and helps keep us updated and ensure we are offering the best support possible to you.
3. To provide emotional support via our in-house and when needed external support services.
4. With your permission we will provide the information you have provided to us to one of the solicitors we work with to assist you with your case, However we always carry out conflict checks to ensure your information is kept secure before we pass all the details over to a solicitor, Step 1 would be your personal details such as Name, address, phone number and Date of birth to the solicitor, if no conflicts we then provide the Service user pack to them which captures the information you told us.
5. By providing the information to us, we may be able to assist with legal aid evidence letters once we have done an assessment with you, but we may need you to approach other agencies such as a medical professional to assist us with the information we need, this will be explained to you should we need this.
6. From time to time, you may wish to send reports into us for our case advisors to look at, all information will be held on a secure system known as Case Worker.

**We may also receive personal information from but not limited to the following sources in the following scenarios:**

1. The solicitor we have sent you to may give us updates so we can provide extra support to you.
2. If we have provided an IDVA to your case (Independent Domestic Violence Advocate) or an ISVA (Independent sexual violence advocate) or IDSVA ( both roles into 1) we may receive information from the Multi Agency professionals with whom the IDVA/ISVA held the MARAC with. More information on MARAC / IDVA and GDPR can be found in this link > <https://safelives.org.uk/sites/default/files/resources/Sharing%20Information%20and%20Marac%20GDPR%20FAQs%20-%20England%20%26%20Wales%20version.pdf>
3. If we have asked you to provide us with a medical letter (we will send this to you first) this will be held on file from the medical professional to assist your case.

We use the information that you have given us in order to Provide the correct support with Legal advice, Referral to a solicitor, in -house emotional support and other 3rd parties as agreed with you when needed.

We may share this information when required to do so by law such as Safeguarding issues, Danger to life, formal requests from a government agency.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

Consent, <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>

Legitimate interests, <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>

Criminal Offence Data, <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/criminal-offence-data/>

**The lawful bases for information sharing are described below.**

Without detriment of any other legal basis that may be applicable, UK GDPR Article 6(1)(d) - processing is necessary in order to protect the vital interests of the data subject or of another natural person – and Article 9(2)(c) Recital 46 form the core legal basis for each of the parties to process MARAC data.

**Other relevant legislation includes:**

• DPA 2018 Schedule 1 Part 2 Conditions: 10, 11, 17, 18

• Human Rights Act 1998: Article 2 and Article 3 whereas Only proportionate and directly relevant information to the safety of the victim and their children will be shared. This includes their personal information, information about the abuse they have suffered, their health, the support they have received from Social Work Services and other agencies/ organisations, their housing situation. It also includes information about the perpetrator as they are the source of risk that needs to be managed.

This information can include the perpetrator’s behaviour and criminal history, the risk that the perpetrator poses, their housing situation, their health information and whether they have spent time in custody.

Relevant information can therefore be shared when it is necessary to prevent a crime, protect the health and/ or safety of the victim and/ or the rights and freedoms of those who are victims of violence and/ or their children. It must be proportionate to the level of risk of harm to a named individual or known household.

**(a) Your consent**. You are able to remove your consent at any time. You can do this by contacting us, your file will then be closed, but will remain for 6 years on the system before it is fully removed.

**(b) We have a legitimate interest.** By you contacting us asking for our help.

**( c ) Criminal Offence Data**, this will have no impact on the services we provide to you, but will assist us as a charity and any solicitor we pass your information onto to better understand your case moving forward.

**How we store your personal information**

Your information is securely stored.

We keep all information held on your file/case] for 6 years from last contact. We will then dispose your information by removing your case/file from the secure case worker mp system by electronic shredder for added security.

**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.

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 restriction of 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 right to object to the processing of your personal information in certain circumstances.

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

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at feedback@fnf-bpm.org.uk or write to us at Both Parents Matter Cymru at Office 4, Abacus House, Caxton Place, Cardiff, CF23 8HA if you wish to make a request.

Any request a copy of your information we hold will require this to be put into writing and we will ask for proof of I.D, this is to safeguard your personal information.

**How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to us at Both Parents Matter Cymru Office 4, Abacus House, Caxton Place, Cardiff, CF23 8HA or by emailing us at feedback@fnf-bpm.org.uk .

Please also see our complaints procedures.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO’s address: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113

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

**Face to face legal and emotional support meetings**

From time to time, the charity will hold support meetings on-line and or face to face to assist you.

All information discussed within the meetings must always remain confidential as per your agreement with us.

Parties should not revile information that could identify other persons within the open forums, side rooms are available to speak to someone on the night for confidentiality reasons.

Everyone is welcome to attend the face 2 face meetings, but we do NOT recommend bringing children.

Everyone that attends will be asked to sign in using either our QR code or providing us your details.

This information is placed onto your file to show you attended and or a new contact file is set up if you are using us for the first time. All information is held as above.

**Buddy events**

From time to time, we run in-house buddy events.

This could be day’s out for adults, or adults and children and now and then we offer holidays aways which is mostly paid for by the charity.

We will always ask you to sign a special consent form which will have the risks to the events and also what we expect from you whist attending the events.

This information is placed onto your file and held as above within our policies & Procedure

Last updated July 2025 NICHOLAS GRAY SENIOR MANAGER (IDSVA)