

## Domestic Abuse Healing and Empowerment Service Privacy Notice

Gloucestershire County Council [the council] is the data controller for the personal information we collect from you. All information processed by the council is covered by our [Data Protection Policy](#). For an overview of how the council will use your personal data please visit our [privacy notice pages](#).

This service is delivered by Family Action who are the council's data processors

This privacy notice is designed to help you understand how we use personal information when delivering our services. The details below will outline

- Why we collect and use your information;
- Where we get your data from and who we will share it with;
- What gives us the right to use your information;
- How long we will keep your information; and
- Your rights.

### 1: Why we collect and use your information

The table below outlines:

- What we use your information for;
- What gives us the right to use your data - the legal basis;
- Details of the legal conditions; and
- Our reasons for using your data.

## Personal and Special Category Data

The use	The right (lawful basis) for using your data			The reasons why we need to use your data
	Personal data (Article 6 GDPR <sup>1</sup> )	Special category data (Article 9 GDPR <sup>2</sup> )	Special category data (DPA 2018)	
Determining suitability for the service	Processing is carried out to complete a public task – the Council has a statutory duty to deliver support in domestic abuse safe accommodation under part 4 of the Domestic Abuse Act 2024	Processing is necessary for the provision and/or management of health and/or social care systems	We meet the requirements of Part 2(8) – necessary for the purposes of equality of opportunity Part 1(2)(1) – necessary for health or social care purposes	We need to process your data to determine if you are in specified domestic abuse safe accommodation and whether the service is suitable for you (i.e. that offering you trauma recovery support would not present a risk to you or that any risks can be managed safely) We need to process your data so that the service is able to make contact with you and to know if any adjustments need to be made to contact you i.e. you need to be contacted via an interpreter. This processing will all be carried out by Family Action who are our data processor.
Delivering Support	Processing is carried out to complete a public task – the Council has a statutory duty to deliver support in domestic abuse safe accommodation	Processing is necessary for the provision and/or management of health and/or social care systems	We meet the requirements of Part 2(8) – necessary for the purposes of equality of opportunity	Data will be processed during support to manage and assess risk. Data will be processed to assess and meet your support needs.

<sup>1</sup> Article 6 e) Public task <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/lawful-basis-for-processing/public-task/>

<sup>2</sup> Article 9 h) Health & Social Care <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/special-category-data/what-are-the-conditions-for-processing/#conditions8>

	under part 4 of the Domestic Abuse Act 2024		Part 1(2)(1) – necessary for health or social care purposes	<p>This processing will all be carried out by Family Action who are our data processor.</p> <p>Data will be processed to make onwards referrals to meet statutory safeguarding duties as appropriate i.e. if the service believes that there is a risk to a child’s safety or welfare.</p>
Reporting to the Council	Processing is carried out to complete a public task – the Council has a statutory duty to deliver support in domestic abuse safe accommodation under part 4 of the Domestic Abuse Act 2024	Processing is necessary for the provision and/or management of health and/or social care systems	We meet the requirements of Part 2(8) – necessary for the purposes of equality of opportunity Part 1(2)(1) – necessary for health or social care purposes	<p>Commissioners need to receive data to evaluate if the service is supporting us to meet our statutory duties under the Domestic Abuse Act and to identify gaps in provision– the service will provide us with service level data on its performance including equalities data.</p> <p>The service will provide the council with personal data if it reports safeguarding concerns.</p> <p>The service may need to provide commissioners with personally data in the event of serious complaints or safeguarding concerns.</p>
Equalities monitoring	Processing is carried out to complete a public task – to pay due regard to the Equalities Act 2010.	processing is necessary for reasons of substantial public interest	Part 2(8) – necessary for the purposes of equality of opportunity	Commissioners need to receive data to evaluate if the service is supporting us to meet our statutory duties under the Domestic Abuse Act and to identify gaps in provision– the service will provide us with service level

				<p>data on its performance including equalities data. Commissioners will review data to determine if any groups are underrepresented within service provision and to understand where barriers to accessing provision may exist. Service level data is used to inform equalities impact assessments which will support future decision making</p>
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For further information on how we process special category information please see our [Special Category Data Policy](#) .

## 2: What information we collect about you

Gloucestershire County Council via our data processor Family Action will collect personal information that we need to perform our functions.

We will collect

- Name
- Contact information (telephone number, email address etc.)
- Address
- District (council) of residence
- Date of birth
- Gender
- Occupation
- Relating to domestic abuse
- Behavioural data (i.e. diet, sleep, physical activity, hygiene, school attendance)
- Family, lifestyle and social circumstances
- Housing needs
- GP practice
- Support network
- Health and/or social care data
- Racial or ethnic origin
- Religious or philosophical beliefs
- Person's sex life or sexual orientation

### 3. Where we get your data from and who we share it with

The personal information we collect, use and share comes from a variety of sources. We also sometimes need to share your personal information with other people and organisations, for example to provide you with a service to meet your needs. Our sources and recipients of personal data are:

Sources:

- *Your support in safe accommodation provider – GreenSquareAccord Limited (as the providers of Gloucestershire Domestic Abuse Support Service – GDASS, and Places of Safety), or Stroud Beresford (as the provider of support in refuge accommodation)*
- *Directly from you*

Recipients

- *Your support in safe accommodation provider – GreenSquareAccord Limited (as the providers of Gloucestershire Domestic Abuse Support Service – GDASS, and Places of Safety), or Stroud Beresford (as the provider of support in refuge accommodation)*
- *Gloucestershire County Council*
- *Onward support agencies – if you request Family Action to support you in making referrals for other relevant support needs for example referrals to commissioned drug and alcohol support services or referrals to specialist mental health services*
- *Anonymised service level data will be reported to central government in relation to evidencing the use of grant funding and demand for safe accommodation*

The council will also be evaluating the service during its contract term (potentially via a third party with experience in service evaluation), this will involve evaluating non-personal service level data (referral numbers, level of positive outcomes etc) and feedback from system partners. The council may though as part of the evaluation process also seek to gather direct feedback from service users, this will be entirely optional, and the provider would ask any current service users at that time if they wished to participate in a feedback session.

Your personal data may also be used by the council or shared with regulatory and statutory bodies, to assess council performance and financial spend, as well as where required by law, such as to prevent and detect crime or fraudulent activity.

We also use your personal information to assess whether our services are making a difference, to develop and improve services, measure how well the council as a whole is doing and administer and protect public funds

Gloucestershire County Council uses third party suppliers to provide Information Technology and Communications solutions, support and hosting services. These organisations may process your personal data only where it is necessary as part of the service they provide. These organisations are contractually obliged to handle and protect your data in line with data protection legislation and council policies.

#### 4. How long we keep your information for

Gloucestershire County Council will keep your personal data for six years after the end of the contract. We are required to keep this information for this long as per our retention schedule.

We may keep your information for longer than is stated in certain circumstances such as if you have an open complaint about the services received, for evidence to defend a legal claim or if we are required to by law.

To find further information on how long we keep your information, you can read our retention and disposal schedule at [www.gloucestershire.gov.uk/retention](http://www.gloucestershire.gov.uk/retention).

#### 5. How to contact us

Please contact us if you have any questions about this privacy notice:

By email: [publichealth@gloucestershire.gov.uk](mailto:publichealth@gloucestershire.gov.uk)

In writing: Public Health and Communities, Gloucestershire County Council, Block 4, Floor 2, Shire Hall, Westgate Street, Gloucester, GL1 2TG

#### 6. Your rights

The below information will outline the rights you have that are applicable to this particular use of your information, briefly explain what they mean and tell you what to do if you want to use your rights.

Applicable Data Subject Rights by Lawful Basis					
	Right to withdraw consent	Right of Access	Correction of inaccurate information	Right to be forgotten	Right to object
Public Task	✗	✓	✓	✗	✓

You can visit our website for more details about your [information rights](#).

## 7. Using your rights

If you wish to use any of your rights, detailed in section 6, please contact us using one of the methods below:

Online at [your information rights](#)

Email to [Managemyrequests@gloucestershire.gov.uk](mailto:Managemyrequests@gloucestershire.gov.uk)

### In Writing to

Information Management Service  
Gloucestershire County Council  
First Floor, Block 4(a)  
Shire Hall, Westgate Street  
Gloucester  
GL1 2TG

You can contact the council's Data Protection Officer, via the Information Management Service, by emailing [dpo@gloucestershire.gov.uk](mailto:dpo@gloucestershire.gov.uk) or by calling 01452 32 4000.

### **Making a complaint to the Information Commissioner**

If you wish to make a complaint about how we use your personal data to the Information Commissioner's Office, you can contact them by visiting their website at <https://ico.org.uk/> or by calling 0303 123 1113.

## 8. Document Information

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