

Women and Girls Network Privacy Statement

Purpose of this Privacy Statement

This Privacy Statement explains why and when Women and Girls Network (WGN) collects personal information about our clients and people who get in touch with us, how we use it, when may share it with others, and how we keep it secure.

We keep this Privacy Statement under review and we may update it so please check this page from time to time. By continuing to use our website and our services, you agree to us using your personal information as set out in this Privacy Statement.

Who are we?

When we refer to “we” or “us” we are referring to Women and Girls Network (WGN).

We are a registered with the Charity Commission for England and Wales (charity number 1150354) and our address is PO Box 13095 London W14 0FE. We are also listed on the Information Commissioner’s register of data controllers under Registration Number Z3390416.

WGN is a specialist women-only service that supports women and girls in London affected by all forms of gender based violence. WGN’s services provide a holistic, integrated healing journey promoting total and sustainable recovery supporting women and girl’s transformation from survivor to thriver.

Contact us

If you would like to contact us about this Privacy Statement, or if you have any questions about how we use your personal information, you can contact us by:

- email to Akima Thomas (Clinical Director) privacy@wgn.org.uk
- post by writing to Woman and Girls Network, PO Box 13095, London W14 0FE
- telephone on 020 7610 4678

Glossary

We use the term **personal information** to mean any information from which you can be identified. This might include your name, your home address, your personal email contact details, or your telephone number. Personal information does not include information where your identity has been removed (i.e. anonymous data).

We use the term **special categories of personal information** to mean information about your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation.

When we talk about **criminal offence information**, we mean personal information about criminal convictions or offences.

How do we collect personal information from you?

We collect personal information directly from you when you contact us by phone, email, by post, when you fill out a form on our website, or when you meet us in person. This includes personal information you provide when you:

- call our telephone advice line or our dedicated sexual violence helpline
- use our counselling services
- receive body therapies
- attend our groupwork sessions
- use our Independent Sexual Violence Advocate (ISVA) service
- attend support groups or workshops provided through our Young Women's Advocacy Project (YWAP)
- access support through our Indigo Project
- attend an accredited training course, workshop or seminar run by WGN
- take part in one of our service user involvement projects
- fill out a form or make a donation via our website

We also receive personal information about you when we receive referrals from third parties such as social workers, GPs, mental health services or solicitors.

We use cookies to automatically collect some personal information from you when you use our website. Please see our cookie policy for further details.



Our website may include links to other third-party websites, including social media platforms. We do not control these third-party websites and we are not responsible for how they collect or use your personal information. We encourage you to read the Privacy Statement of every website you visit.

Any information you provide when you interact with us on social media or when you join WGN groups on social media will be governed by the Privacy Statements of the social media platform.

What type of personal information do we collect?

We may collect, use, store and transfer the following kinds of personal information about you:

- **Identity information** such as your name, title, relationship status, date of birth, age, gender, address or borough, immigration status and employment status.
- **Contact information** such as your address, telephone numbers, email address and GP contact details.
- **Support service information** such as your involvement with external agencies (e.g. social workers, the police, medical professionals), the number of children you have, background information that you give us (e.g. information about your family and/or your experiences of abuse), a summary of your support needs and notes about any risks to you or others that we identify.
- **Referral information** including the name of the organisation and/or individual who referred you to WGN and any correspondence received from them.
- **Communications and monitoring information** such as what types of information you would like to receive from us, your communication preferences, photographs of you at WGN events, quotes from you that we may use in WGN marketing materials, and feedback that you provide on our services.

We may also collect, use, store and transfer the following kinds of special categories of personal information and criminal offence information:

- **Health information** about your physical and/or mental health, including information about pregnancy, and information about any medication you are taking.
- **Race and ethnicity information** for the purposes of monitoring equality of opportunity and treatment, and information that you provide about your ethnicity in relation to your immigration status.
- **Sex life and sexual orientation information**

- **Religious or philosophical belief information**
- **Criminal offence information** such as details of any offences that have been committed against you, crime reference numbers, bail conditions, judgments and details of claims made to the Criminal Injuries Compensation Authority (CICA).

We also collect, use and share aggregated information (e.g. statistical or demographic data) that we may provide to third parties, including our funders. Although this may be derived from your personal information, it is not considered personal information by law as it does not directly or indirectly reveal your identity.

If you do not provide us with personal information that we need in order to deliver our services responsibly and in accordance with the requirements of our regulators, we may not be able to assist you. We will notify you if this is the case.

How do we use your information?

When you use our services

We will ask for your consent to collect and use your personal information and special categories of personal information for the purposes of providing the following services:

- telephone advice line
- dedicated sexual violence helpline
- counselling services
- body therapies
- groupwork sessions
- Independent Sexual Violence Advocate (ISVA) service
- Young Women's Advocacy Project (YWAP) support groups and workshops
- the Indigo Project

If we receive your personal information from a third-party making a referral to us, we will ask them to confirm that you have consented to your personal information being shared with WGN for this purpose.

In exceptional circumstances, we may use and share your personal information without your express consent. Some examples of when we may use your personal information in this way include:

- if we identify a safeguarding risk;
- if we think there is a risk of serious and/or immediate harm to you or another person;
- if we believe that an unlawful act has happened or is about to happen;
- where we are under a legal duty to provide the information (e.g. by order of a court).

We will only use your personal information in this way if we are satisfied that we (or a third party) have a legitimate interest which is not overridden by your personal interests or if we believe it is necessary to protect the safety or life of you or another person (referred to as 'vital interests').

We will only use and share your special categories of personal information or criminal offence information without your consent if there is a substantial public interest for doing so (e.g. to preventing or detecting an unlawful act or to safeguarding children or adults at risk) or if we believe there is a vital interest and you are incapable of giving consent.

Training courses and service user involvement projects

We will ask for your consent to collect and use your personal information if you take part in:

- an accredited training course, workshop or seminar run by WGN; or
- one of our service user involvement projects.

Marketing

We will only send you information about the work that we do and how you can get involved if you have given consent to receive marketing communications. We will never share your personal data with a third-party for marketing purposes without your express consent.

You have the right to withdraw your consent to marketing or to change your marketing preferences at any time by contacting us at privacy@wgn.org.uk

On occasion we may also use personal information you provide such as quotes, questionnaire and interview feedback, photographic images and video footage (where we own the copyright), case studies and social impact information for marketing or fundraising purposes. This includes social media, website and on printed material.

Direct messages

If you send us a private or direct message via social media, we may share this information with other WGN personnel if we are satisfied that we have a legitimate interest to do so, for example, in order to respond to a specific query or to pass on information. We will not share any personal information that you provide in a message with any other organisations without your consent.

If you send a query or complaint to us, we will use the personal information you provide to us (for example, your name and the name(s) of any other individuals involved) in order to process your query or complaint and respond to you. Where we have a legitimate interest, we will share this information with third parties such as our regulator, the Charity Commission, or the Information Commissioner's Office (ICO).

Children and Young People

If you are under 16, we ask you parent or guardian to give us permission to collect and use your personal information for any of the reasons set out in the 'How do we use your information?' section above.

We will only use your personal information without the consent of your parent or guardian if we have serious concerns, such as:

- emergency situations to protect your life (or the life another person);
- preventing or detecting unlawful acts;
- safeguarding you or another person who may be at risk.

How long do we keep your personal information?

We will keep your personal information for as long as necessary for the purposes we collected it (e.g. whilst you are accessing WGN services) and in order to meet our professional, legal, accounting and reporting requirements.

We review our retention periods for personal information on a regular basis. Our current default retention periods are:

Type of personal information	Retention period
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Adults over the age of 18 who access our services	While the individual continues to use our services and 7 years after that
Young people under the age of 18 who access our services	7 years from the year in which the young person reaches the age of 18
Personal information used for research	Until publication of the research
Service user involvement projects	3 years from the end of the project

We may extend or reduce these retention periods if we deem it necessary, for example, if there is an on-going investigation relating to the personal information.

Sharing personal information

We only share your personal information outside WGN when we believe it is lawful and fair to do so. We will never sell or rent your personal information third parties for their own marketing or commercial purposes.

We may share your personal information:

- if you have given us consent to share your information with other agencies or organisations (e.g. social workers, immigration advisers or refuges);
- when we engage our own external service providers (e.g. our accountants, solicitors, or technical support providers);
- if we are under a legal duty to disclose your personal information (e.g. if required by the police or by a court order);
- to contact the emergency services if we believe you are in serious and immediate danger;
- if there is a substantial public interest in sharing your personal information with the police in order to prevent or detect unlawful acts;
- if there is a substantial public interest in sharing your personal information with appropriate safeguarding agencies to safeguard children and/or adults at risk;
- if we need to share your personal information with a regulator, for example, making returns to HMRC or reports to the Charity Commission;

- to protect our rights, property and safety, or the rights, property and safety of others (e.g. exchanging information with other organisations and regulators for the purposes of fraud protection);
- as part of a change to WGN's structure such as a transfer, merger, reorganisation, change of legal form, dissolution or similar event (we will always notify you in advance and we will aim to ensure that your privacy rights will continue to be protected).

Your rights

You have the right to:

- **Ask us to correct personal information** that we hold about you which is incorrect, incomplete or inaccurate.
- **Access your personal information** by making a data subject access request. This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.
- **Withdraw your consent** to us using your personal information.

In certain circumstances, you also have the right to:

- **Ask us to delete your personal information** from our files and systems.
- **Object to us using your personal information** for our legitimate interests (or those of a third party) or where we are using your personal information for marketing purposes,
- **Ask us to restrict or suspend the use of your personal information**, for example, if you want us to establish its accuracy or our reasons for using it.
- **Ask us to transfer your personal information** to another person or organisation.

Please contact us at privacy@wgn.org.uk if you want to exercise any of these rights.

Security

We have security measures in place to protect your personal information and to prevent it from being accidentally lost, altered, used, accessed or shared in an unauthorised way.

- We hold your personal information in our database and on our on-site file servers, which are protected by both hardware and software firewalls.
- We have off-site back-up servers in secure locations.
- We password protect electronic information.
- We store papers in lockable cabinets in our offices when not being actively used.
- We ensure that our staff, volunteers, agents and contractors are aware of their privacy and data security obligations.
- We limit access to your personal information to people who have a need to know.

Transmission of personal information over the internet can never be guaranteed to be 100% secure. While we do our best to protect your personal information, we cannot guarantee the security of any information you share with us via the internet and you do so at your own risk.

We have in place procedures to deal with any suspected personal data breach. We will notify the Information Commissioner's Office (ICO) of a breach (or suspected breach) where we are required to do so. We will also contact you directly if the breach (or suspected breach) results in a high risk to your privacy.

Transfers outside the European Economic Area

We may transfer your personal information to countries outside the European Economic Area ("EEA"). These countries may not have similar data protection laws to the UK.

If you use our services while you are outside the EEA, your personal information may be transferred outside the EEA in order to provide you with those services.

If we transfer your personal information outside of the EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Statement. By giving us your personal information, you agree to us transferring, storing or otherwise processing your personal information in this way.

Questions or complaints

If you have any questions about this Privacy Statement or how WGN handles your personal information, please contact us at privacy@wgn.org.uk



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Fax: 020 7602 8610
Helpline: 0808 801 0770

www.wgn.org.uk
info@wgn.org.uk
Charity no. 1150354 Company no. 8286856

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues - <https://ico.org.uk/make-a-complaint/>.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in May 2019.