



## **Client Privacy Notice**

**Updated 30 July 2020**

### **Who we are**

We deliver funding and support to victims and survivors of the Conflict/Troubles, on behalf of The Executive Office.

### **What is a privacy notice?**

A Privacy Notice is a statement by the Service to all stakeholders that describes how we collect, process, retain and disclose personal information which we hold. It is sometimes also referred to as a Privacy Statement, Fair Processing Statement or Privacy Policy. This privacy notice is part of our commitment to ensure that we process your personal information/data fairly and lawfully.

### **Why issue a privacy notice?**

The Victims and Survivors Service recognises the importance of protecting personal and confidential information in all that we do and takes care to meet its legal and regulatory duties. This notice is one of the ways in which we can demonstrate our commitment to our values of being transparent and open, and commitment to our values of Respecting Diversity, Acting with Integrity, Demonstrating Compassion, Striving for Excellence and to Listening and Supporting Others. This document clearly expresses the policies of the service in the management of personal information and is accessible to anyone upon request.

### **What are we governed by?**

The key pieces of legislation/guidance we are governed by are:  
Data Protection Act 2018  
Freedom of Information Act 2000  
The Common Law Duty of Confidentiality  
General Data Protection Regulations (GDPR)

### **Who are we governed by?**

Information Commissioner's Office - <https://ico.org.uk/>

## **Why and how we collect information**

We may ask for or hold personal confidential information about you which will be used to support delivery of appropriate care and support. Data is lawfully processed using legitimate interests and consent obtained under article 6 1(f) and 1(a) of the General Data Protection Regulations and special category data obtained under article 9.2(d), stored and processed solely to assist staff in the efficient running and monitoring of the service and service improvement. Personal details supplied by all stakeholders are only used to process material that is considered necessary. This data is stored securely with access restricted to appropriate identified personnel. We employ technical, contractual and administrative steps to ensure information is protected against unauthorised access and disclosure.

### **Information collected may include:**

- Basic details, such as name, address, date of birth, next of kin.
- Contact we have had, such as appointments and correspondence.
- Details and records of eligibility, including notes and reports about your health
- Details of awards and support given as part of our programmes

### **Permission to hold and use data for research and improvement**

Some of the information we gather here will be used to help us to deliver better services. Information used for this purpose is **anonymous**. There will be no information released that could in any way identify you.

### **How we use information**

To help inform decisions that we make about service users care.  
To ensure that treatment is safe and effective.  
To work effectively with other organisations who may be involved in individuals' care.  
To ensure our services can meet future needs.  
To train our staff.  
For audit.  
To prepare statistics on our performance.  
To monitor how we spend public money.

### **It helps you because:**

- Accurate and up-to-date information assists us in providing the best possible care for our service users.
- All appropriately identified staff members can readily access the information they need to provide the best possible support and care.

### **Who will the information be shared with?**

We will always keep your information safe and private. However, on occasion we may

need to share certain information with other professionals. For example, we may do this in order to:

progress requests that you have made for support,  
ensure your safety and the safety of others;  
and ensure that we continue to operate in accordance with the law.

We work with a number of other organisations to deliver services and support. We may find that one of these organisations can offer you assistance. We will only refer you to an organisation that you have agreed is a good choice for you, and with which you have given us permission to communicate for you and share your details.

Information sharing is also governed by specific rules and laws.

- When the health or safety of others is at risk or where the law requires the disclosure of information.
- We may also share information for the prevention and detection of fraud.
- Where client information is shared with other organisations, an information sharing agreement is drawn up to ensure information is shared in a way that complies with relevant legislation.

### **Access to your personal data.**

You may ask us whether we process your personal data. If that is the case we will explain what personal data about you is processed by us, in what way and for what purposes we do this. You may also request from us a copy of your personal data that we process.

### **Rectification of your personal data.**

In case it is your opinion that your personal data that we process, is incorrect or incomplete, you can make a request for to have inaccurate data rectified, or completed if it is incomplete.

### **Restriction of processing of your personal data.**

In some cases you may wish that the processing of your personal data is restricted. In that case you may request from us restriction of processing. We will comply with such a request in the following cases:

It is your opinion that your personal data which we process, is incorrect. We will not use this personal data until the data has been verified and possibly modified or completed;

The data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR)

We do not need your personal data any longer but you wish to be able to use this data in order to establish a claim or instigate legal proceedings;

You object to our processing of your personal data and we have not yet evaluated your objection. If processing of your personal data is subject to a restriction, we will process this data only with your consent. Before the restriction is lifted, we will inform you of that.

### **Right to data portability.**

In some circumstances you may request from us a copy of your personal data which we process. We will provide you with a copy in a commonly used format which can be used for instance, if you wish to transfer the data to a different service provider, in the case where this is technically possible for us and if you wish, we can directly transmit the personal data to your new service provider.

You also have the right to **object** in writing to the processing of your personal data. In the case you do object, you must provide the grounds relating to your particular situation as to why you do not agree with processing of your personal data.

### **Can I access my information?**

Under GDPR a person may request access to information (with some exemptions) that is held about them by an organisation. For more information on how to access the information we hold about you please refer to

<https://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-gdpr/>

### **Contacting us if you have a complaint or concern**

We try to meet the highest standards when collecting, processing, storing and using personal information. We encourage people to bring concerns to our attention and we take any complaints we receive very seriously. You can submit a complaint by contacting our Data Protection Officer:

Data Protection Officer  
Victims and Survivors Service  
1<sup>st</sup> Floor, Seatem House  
28-32 Alfred Street  
Belfast  
BT2 8EN  
Email: [dpo@vssni.org](mailto:dpo@vssni.org)

If you remain dissatisfied with our decision following your complaint, you may wish to contact:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF