

PRIVACY NOTICE

WRAP AROUND SERVICE EVALUATION

Advance Charity (“Advance”) and Women In Prison Ltd (“WIP”) have been commissioned by the Mayor’s Office for Policing and Crime (“MOPAC”), to provide services to women across specific London boroughs.

This service, known as the “Wrap Around Service”, provides women with a full range of services, tailored by type, content and location of sessions. It provides consistent long-term **practical and emotional support and advocacy** through an empowering, trauma-informed, gendered approach, reducing barriers to access and supporting long-term recovery.

MOPAC, Advance and WIP with the assistance of the Manchester Metropolitan University, are conducting an evaluation of the services provided by Advance and WIP, to better understand what is working well, and to consider how the Wrap Around Service might be developed and improved in the future.

For the purpose of the evaluation, MOPAC, Advance and WIP (“we”, “us”, “our”) are joint controllers of your personal data and Manchester Metropolitan University is a data processor. This means that Advance WIP and MOPAC have jointly decided how and why to use your personal data and are jointly responsible for the processing.

We take your privacy very seriously. This privacy notice contains important information on how and why we collect, store, use and share your personal data. When we do so, we are subject to the UK General Data Protection Regulation (“UK GDPR”). This privacy notice also explains your rights in relation to the processing of your personal data, and how to contact us or the Information Commissioners Office (ICO) in the event you have a complaint.

Further information about the role of Manchester Metropolitan University can be found in the information sheet which will be provided to those invited to take part in the research entitled “Evaluation of the Wrap Around Service, Information for Participants”

Key terms

Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data (when processed to uniquely identify an individual) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

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Personal data we collect about you

We may collect and use the following personal data about you:

- your name and contact information, including address, email address and telephone number
- your date of birth
- your gender
- the language(s) you speak
- information about your education and/or your work/profession
- information about your criminal convictions and offences including information about reoffending
- information about your background including, health and mental health information, and information about your relationship with family members and others
- information about past experiences including, life events which have influenced you, support you have received from relevant services to date.
- video and/or audio recordings of interviews and focus groups
- information about your opinions on and experience of The Wrap Around Service
- information on your experience with the criminal justice system
- Race, ethnicity, religious or philosophical beliefs, data about, health information.
- Information relating to the support you have received from the Wrap Around Service such as service start and end date, referrals information, information about courses or support groups attended, needs and risk information and your satisfaction with service you have received,
- Information required to enable you to use videoconferencing tools which are used for interviews, if they are needed, and storing of permission/consent forms relating to those interviews.

How your personal data is collected

- Your Key Worker may ask you to be interviewed by a researcher from Manchester Metropolitan University so that we can better understand the service that has been provided and what you thought about it. These interviews will be face to face at the women's centre you usually attend or may take place via video conferencing. You may also be invited to attend focus groups.
- Some information used to select individuals who will be asked to take part in the evaluation and used in the research itself, will be taken from files held by the Advance and WIP.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a lawful basis for doing so. For instance where:

- you have given consent
- the processing is necessary for reasons of substantial public interest

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- the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

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The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
<p>Pseudonymised data (information without direct identifiers such as names and dates of birth) will be reviewed by MOPAC to consider who to invite to take part in the research. At this stage anonymous information will be passed to Manchester Metropolitan University to assist in deciding which individuals to invite to take part.</p> <p>We will use the information from the individuals who agree to participate to do a piece of research to consider whether the Wrap Around Service is working well and to consider whether we can make any improvements to the service. The research itself will be undertaken by Manchester Metropolitan University,</p> <p>The reports produced as a result of the research will not identify the participants, they will only use anonymous aggregated data e.g. 70% of women who received support from the Wrap Around Scheme were satisfied with the service.</p> <p>This research will not have any direct effect on the participants although it may lead to changes in the way the Wrap Around Service is operated.</p>	<p>Processing is necessary for the performance of a task carried out in the public interest and is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of UK GDPR.</p>
<p>Activities necessary to comply with legal and regulatory obligations.</p>	<p>To comply with our legal and regulatory obligations.</p>
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</p>	<p>To comply with our legal and regulatory obligations.</p>

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, e.g.:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary for reasons of substantial public interest, scientific or historical research purposes or statistical purposes;
- to establish, exercise or defend legal claims.

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Who we share your personal data with

We share personal data with:

- our researcher, Manchester Metropolitan University. Personnel from the university will undertake the research on behalf of the joint controllers.
- other third parties we use to help us run our organisations, e.g. IT service providers or website hosts

We aim to conduct the interviews face to face in a safe and socially distanced way at your local women's centre. However, if you prefer, or if it is not safe to do this, we will conduct the interviews electronically using a videoconferencing platform. Personal Data will be shared with providers of video conferencing platforms, who host data while we use their platforms and who may store copies of data that has been recorded on those platforms. Please consult the privacy notices of any video conferencing services used for further information on how they will use your Personal Data.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data for the purposes outlined above and to provide services to us.

We may also need to:

- share personal data with external auditors;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

We will not share your personal data with any third party other than those described above.

Where your personal data is held

Personal data may be held at our offices and those of Manchester Metropolitan University and our service providers and agents as described above (see above: '**Who we share your personal data with**').

How long your personal data will be kept

We will keep your personal data until the project is completed in September 2023. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not keep your personal data for longer than necessary.

When it is no longer necessary to keep your personal data, we will delete or anonymise it.

Transferring your personal data out of the UK

We will not transfer your personal data outside of the UK.

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Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data - in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations
To object	The right to object: to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests or in order to carry out a task in the public interest.
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on your data subject rights, including the circumstances in which they apply, you can contact any of the joint controllers (see '[How to contact us](#)' below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

If you would like to exercise any of those rights, please:

- email, call or write to us - see below: '[How to contact us](#)'; and
- provide enough information to identify yourself *e.g. your full name, address* and any additional identity information we may reasonably request from you;
- let us know which right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with security breaches (actual or suspected). We will cooperate to ensure you and any applicable regulator are notified of a security breach where we are

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legally required to do so. MOPAC will co-ordinate the response to any breaches by Manchester Metropolitan University and all other breaches will be dealt with by the controller who is responsible for the breach.

How to complain

Please contact us if you have any query or concern about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published on 14 May 2021

We may change this privacy notice from time to time.

How to contact us

We have agreed that MOPAC should be the main point of contact for individuals. You can contact us by post, email or telephone, if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint. Our contact details are shown below.

Adele Harrison of MOPAC

Principal Research Officer, Mayor's Office for Policing and Crime, 2nd Floor City Hall, Queens Walk, London. Tel: 07738954589

Whilst MOPAC is the main point of contact, you can contact Advance or WIP in relation to this notice and the processing it relates to. Their contact details are as follows:

Data Protection at Advance Charity

PO Box 74643 London, W6 6JU Tel: 020 39533111

Data Protection at Women in Prison

Elmfield House, 5 Stockwell Mews London, SW9 9GX
Tel: 020 73596674 info@wipuk.org

Individuals in the UK

You can contact us using the details in the main contact box at the top of this privacy notice. by post, email or telephone, if you have any questions about this privacy notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.