

## Findaway Phonline Confidentiality Policy

### Purpose of the Findaway Phonline

Findaway is a project by Wearside Women in Need (WWIN). Findaway offers confidential, anonymous support to the public through a phonline and web-chat on specified days. Findaway Phonline is an adult only service (16 years and above). Findaway Phonline is not an emergency service.

Findaway Phonline offers practical information and signposting in relation to domestic abuse to adults worried about someone else. Calls and chats are taken by trained staff who are there to listen, support, inform and signpost. We do not offer a counselling service through these mediums.

The person accessing Findaway Phonline is in control of the information they share with the service. Findaway staff will be clear with regards to the remit of the service and that Findaway will not act on behalf of a third party, rather equip the person accessing the service with information to make informed choices/decisions pertinent to their unique circumstances. Findaway staff will be clear that callers should not identify anyone other than themselves.

### Confidentiality

The Findaway Phonline and Webchat Service (the Findaway Phonline) respects and seeks to preserve the confidentiality of users. Confidentiality is based on the common law 'duty of confidence' and is shared between the caller and the Findaway Phonline, not the individual worker.

### Privacy and The Phonline

The Findaway Phonline respects the privacy of users. IP addresses are automatically collected by the Findaway website, but these are not shared or used to identify user's identity except in circumstances where WWIN is legally required to (e.g. if we receive a court order requiring us to share information or are required to do so).

### Breaking confidentiality with consent

If a user of the Findaway Phonline presents with a cause for concern, defined as an imminent risk of death to themselves or someone else or with information pertaining to terrorism then this is the only circumstance in which personal data information will be requested from a user.

In this instance the Findaway Phonenumber will attempt to gain personal information, and the users consent to share them. After this consent is received information will be gathered to pass on to emergency services so that the individual subject of the cause for concern can be reached and assisted. This data is only passed on to the emergency services. Emergency services will record this information according to their policies and procedures, beyond the control of WWIN.

Personal data may also be collected in the event of a complaint being made. It will only be used for the specific purpose of responding to the complaint and no further processing will be carried out.

### **Breaking confidentiality without consent**

In extremely rare cases, the Findaway Phonenumber may need to gather and share personal information without gaining consent. This will be in situations where:

- There is a legal requirement to provide information following receipt of a court order requiring us to share information or are required to do so by nation-specific legislation.
- Information regarding an imminent act of terrorism or similar risk to the life of a third party.
- A user appears to be unable to give consent or becomes unconscious and they have told us where they are, allowing us to alert emergency services.
- If a user shares information (such as location) which identifies a child or vulnerable adult who is at risk of serious harm.
- A user threatens the safety of the WWIN staff including phonenumber staff or the delivery of our service or any other third person about whom the user makes specific threats of harm.

### **Storage and retention of personal data**

Findaway would like to hold basic information on callers to ensure they receive the best service. This information is held securely and would not be shared outside of Findaway (except in the cases indicated above). The information stored would be a name, contact number or email and a basic record of any advice or signposting offered by Findaway. We will not record identifying information about third parties. Consent to record this information will be gained by Findaway staff at the start of any phonenumber calls.

To protect the vital interests of phonenumber users the personal information provided in a cause for concern situation is recorded by Findaway Phonenumber's partners with date and emergency services log numbers and stored securely. This may include keeping a transcript of a user's webchat. It is kept for seven years to allow reference should this be required in

due course because of police investigation following a death or to recognise a user's repeated calls for assistance.

## **Collection of non-personal/anonymised data**

### **Collecting anonymised data**

WWIN's priority is to provide a quality service to our users. This does require continual monitoring of the service. Monitoring records are entirely anonymous. We do not record or keep information for monitoring purposes that may identify a user. Where possible the age band, gender, location by region and general circumstance (topics of the call/chat) and the users emotional state is recorded. This is statistical data, primarily in a numerical format, and is stored in a secure database held on a secure server.

### **Sharing anonymised data**

Anonymised data may be shared with trusted partners of WWIN for the benefit of improving and developing the service. This includes funders and those involved in the development of WWIN services. It is a legal requirement for all UK Charities (including WWIN and our funders) to demonstrate that funds have been spent on charitable purposes. Anonymised data is used to measure our impact and outcomes. It will never contain personal or identifying data. This data is only used for the benefit of WWIN's work and is never shared or sold for commercial use.

### **Recording calls and webchats**

Audio of live calls is not recorded. Webchat transcripts are recorded and stored securely in the circumstance where the webchat contains no identifying details. Webchats containing identifying details are not stored and will be deleted within 30 days unless it is kept as part of a cause for concern situation as noted above.

Anonymous webchat transcripts that are saved are stored on a secure server. They may be transferred to partner organisations in the legitimate business interest of WWIN. Extracts may be shared with WWIN staff and funders. The transcripts may be used to aid in the development of WWIN services and is never sold or shared for commercial use.

## **Your Rights**

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) you have a number of rights with regards to your personal data which is only obtained in the situations outlined above regarding a cause for concern situation. You have the right to request from us access to and rectification or erasure of your personal data, the

right to restrict processing, object to processing as well as in certain circumstances the right to data portability. If you have any concerns as to how your data is processed you can contact us on 0191 416 3550

For more information please see WWIN's privacy statement.

### **Making a complaint**

If you wish to make a formal complaint about the phonenumber you can contact the Data Protection Officer via [enquiries@wwin.org.uk](mailto:enquiries@wwin.org.uk) or write to WWIN, 4-6 Mary Street, Sunderland, SR1 3NH. In order to respond to a complaint, it is necessary to know the name and contact details of the user. In these circumstances, personal data collected will be managed in line with WWIN's privacy statement.

\*This policy should be read in line with the WWIN Confidentiality Policy.