

# **RASASH Privacy Notice (General)**

## **1. Who are we?**

Rape and Sexual Abuse Service Highland (RASASH) is a registered charity in Scotland (Scottish Charity No. SC045019) with its registered office at 25 Queensgate, Inverness, IV1 1DG. RASASH is a 'data controller' of the personal data that you provide to us. This means that we are responsible for deciding how we hold and use personal information about you.

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

It is essential that anyone using RASASH's services feels safe to do so and has absolute confidence that any information they share is kept private. This privacy notice will help you understand what information we collect, why we collect it, how we store and use it, and if we disclose the information to anyone else. It will also explain what rights and choices you have regarding your personal information.

## **3. Our lawful basis for processing data**

RASASH collects and processes personal data as part of our 'legitimate interests'. This is the term used to describe the lawful basis as per the General Data Protection Regulation (GDPR).

As a regulated charity, RASASH need to provide evidence to our funders of the work we have done, including financial and statistical information. We also need to collect and store basic information to provide quality services. Our data processing enables us to do this effectively.

## **4. The information we collect**

Most of the personal data we process is provided to us directly by those using our services. We receive personal information from the people who:

- Use our services
- Contact us via social media, email, or by writing
- Contact our support line
- Make a complaint to us
- Make a donation to us

There is no requirement for you to disclose personal information, and we can support you anonymously. However, our ability to provide a quality service may be impacted if we are unable to store personal data.

The information that we collect and process includes:

- Personal identifiers (e.g. name, age, contact details, and gender)
- Service information (e.g. session notes, support plans, and crime reference number)
- Feedback (e.g. evaluations, complaints, and surveys)
- Donations (e.g. name, contact details, payment information)
- Agency information (e.g. name, email address, and contact details)

People using our services may share sensitive personal data. This relates to information about your health, sexual orientation, race or ethnicity, political opinions, or religious or philosophical beliefs. We will not record any sensitive information about you without your explicit consent.

## **5. Why we collect information**

We take your privacy seriously and we only use this information for the purpose for which it was provided. We collect and use personal information to:

- Provide appropriate support and care;
- Monitor and improve the quality and accessibility of our services;
- Report to funders on the work we carry out;
- Comply with the law regarding safeguarding and data sharing

## **6. What information is shared**

It is essential that anyone accessing our services feels safe to do so and has absolute confidence that their personal information will not be shared outside the organisation without their explicit consent. This section outlines the limits to our confidentiality and what information is shared.

As a charity, we are required to report to funders about the work we do. This includes aggregated data (i.e. anonymous information) about who we support and the impact we have. We will never share this information in a way that could identify you.

Personal data may also be shared with other companies that provide services on our behalf. For example, donation information is shared with our auditors. All our third-party service providers are required to take appropriate security measures to protect your personal information and are not permitted to use your personal data for their own purposes.

There are also instances where we are required, by law, to share personal information. This includes situations where we consider your welfare, or the welfare of others, to be seriously at risk. For example, if a child is at risk of harm or you disclose that you have a suicide plan in place. We are also obliged to disclose certain statutory offences, such as drug trafficking or terrorism. In situations where we have a duty to disclose, we will always try to obtain your consent and keep you informed.

## 7. How we store your personal information

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instruction, and they are subject to a duty of confidentiality.

## 8. How long will we store your personal information

Your information is securely stored and only held for as long as is necessary. After which point, we will securely destroy any personal data.

WHERE IS IT STORED?	HOW LONG IS IT KEPT?
<p><b>People using our services</b></p> <p>All personal data is stored securely on an individual's case file on our digital case management system.</p> <p>This includes information such as contact details, session notes, consent to liaise, and safety plans.</p>	<p><b>Individual case file</b></p> <p>For 5 years from your last point of contact with the service</p> <p>Or until you are 21 years old, if you used the service as a young person (&lt;16 years)</p>
<p><b>People who contact our services</b></p> <p>We will store copies of any emails, texts, or letters on an individual's case file (as above).</p> <p>We will only communicate by email, text, or phone with service-users who have given permission for this.</p> <p>RASASH also processes personal data of individuals who are connected to our service-users. This includes contact details for work with other agencies, where explicit consent has been given by the service-user.</p>	<p><b>Email / text system</b></p> <p>We will delete information from the email and text message system within 6 months</p> <p><b>Translation</b></p> <p>RASASH uses a third-party for anyone requiring translation. The translation service will not retain any identifiable personal information.</p>
<p><b>People who contact us via social media</b></p> <p>RASASH has a Facebook page, a Twitter account, and an Instagram account. Please be aware that anything that you post to these accounts will be public.</p> <p>Messages sent by social media are subject to the privacy notices of the relevant companies running these services.</p>	<p><b>Inbox / messaging</b></p> <p>Private messages will be stored for 6 months</p> <p>We reserve the right to delete any posts that may impact the wellbeing and/or reputation of any individual or organisation</p>

WHERE IS IT STORED?	HOW LONG IS IT KEPT?
<p><b>People who contact us via the website</b></p> <p>Our website does not store personal data that is sent via the 'contact us' form. This is sent directly to our secure email account and deleted from the site.</p> <p>Anonymised website usage information is collected through the use of cookies. RASASH also makes use of Google Analytics.</p>	<p><b>Email</b></p> <p>We will delete information from our email within 6 months</p>
<p><b>People who make a complaint to RASASH</b></p> <p>A complaint file usually contains the case number or name of the complainant and any other individuals involved. This file is kept securely on the RASASH shared file system and access will be restricted according to the 'need to know' principle.</p>	<p><b>Complaints</b></p> <p>We will keep complaint files for 3 years from closure to enable us to assess any patterns over time</p>
<p><b>People who donate to RASASH</b></p> <p>Personal data may also be provided as part of one-off or regular donations to RASASH. This may include someone's name, payment information, and contact details.</p> <p>This information is processed by RASASH to meet our financial reporting duties.</p>	<p><b>Financial data</b></p> <p>One-off donations without Gift Aid are kept for 2 years and regular donations without Gift Aid are kept for 2 years since the last donation</p> <p>Donations with Gift Aid and grants information is kept for 7 years</p>
<p><b>Safeguarding</b></p> <p>There may also be instances where we need to process personal data to protect someone's life. For example, if a child is at risk of serious harm. This information will be stored on the individual's case file (see above)</p>	<p><b>Third-parties</b></p> <p>Information shared with statutory bodies, such as the police or child protection is subject to their privacy notices.</p>
<p><b>Third-party sources</b></p> <p>We also collect and retain information from public sources. For example, personal data from the Sheriff and Crown Courts. This is only ever used in relation to our criminal justice support to service-users. Such information will be stored on the service-user's individual case file.</p>	<p><b>Individual case file</b></p> <p>For 5 years from your last point of contact with the service</p> <p>Or until you are 21 years old, if you used the service as a young person (&lt;16 years)</p>

## 9. Your data protection rights

Under data protection, your rights include:

- **Right of access:** You have the right to ask us for copies of your personal information
- **Right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Right to object or restrict processing:** You have the right to ask us to restrict or object to the processing of your personal information in certain circumstances.
- **Right to complain:** You have the right to complain to us or submit a complaint to the Information Commissioner's Office.

You can make a request verbally or in writing. We will respond to you within one month from the request. You are not required to pay any charge for exercising your rights.

## 10. How to complain or make a query

Please contact us at the details below if you wish to make a request, a complaint, or would like more information on our data collection and processing. You can also complain to the ICO if you are unhappy with how we have used your data.

### RASASH

Rape & Sexual Abuse Service Highland  
Romy Rehfeld (Data Protection Controller)  
25 Queensgate  
Inverness  
IV1 1DG

Phone: 01463 257 657  
Email: [info@rasash.org.uk](mailto:info@rasash.org.uk)  
Website: [www.rasash.org.uk](http://www.rasash.org.uk)

### INFORMATION COMMISSIONER'S OFFICE

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

Helpline: 0303 123 1113  
Website: <https://www.ico.org.uk>