

# HER WAY FORWARD CIC

## PRIVACY POLICY

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### 1. Organisation Details & Responsible Person

Detail	Information
Organisation name	Her Way Forward CIC
Legal structure	Community Interest Company
General email	info@herwayforward.co.uk
Data Controller	Her Way Forward CIC  <i>Exempt (self-assessed as a small non-profit processing data only for core purposes)</i>  Shannon Lee — info@herwayforward.co.uk

Her Way Forward CIC complies fully with the UK General Data Protection Regulation (*UK GDPR*) and the Data Protection Act 2018.

Although we are exempt from paying the ICO data protection fee and therefore not required to register, we apply the same standards of accountability, transparency, and data protection as registered organisations.

### 2. What Is Personal Data

Personal data is any information that can identify a living individual, either directly or indirectly. This includes names, contact details, online identifiers, photographs, and information relating to physical, mental, cultural, or social identity.

Personal data may be held electronically or on paper. Both formats are covered by this policy.

### 3. What Personal Data We Collect

We collect only the data necessary for a clear, lawful purpose.

**Categories of data include:**

- Participants and members
- Volunteers
- Staff and contractors
- Directors and committee members
- Mailing list subscribers
- Funders and partners
- Incidental data relating to children (we do not routinely work with children)
- Website visitors (cookies and analytics)

We do not collect excessive data. Optional information (such as equality monitoring) can always be declined without affecting access to services.

## **4. Lawful Bases for Processing (*UK GDPR Article 6*)**

We rely on the following lawful bases:

- **Consent**  
For mailing lists, photography, and optional equality or wellbeing monitoring.
- **Contract**  
To deliver services, manage employment, or administer volunteer roles.
- **Legal Obligation**  
For HMRC, payroll, safeguarding referrals, and statutory reporting.
- **Legitimate Interests**  
For service administration, organisational governance, and impact reporting to funders and commissioners (e.g. The National Lottery, Wandsworth Council), provided this does not override individuals' rights.
- **Vital Interests**  
To protect someone's life or prevent serious harm in an emergency.

We do **not** rely on "Public Task" as a lawful basis.

## **5. Special Category Data (*Sensitive Information*)**

Because we support women in sensitive or potentially vulnerable situations, we may process **Special Category Data**, such as:

- Health or wellbeing information
- Racial or ethnic origin
- Accessibility needs

## Legal Basis (*UK GDPR Article 9*)

We process special category data under the following **Article 9 conditions**:

- **Explicit consent** from the individual; and/or
- **Social protection law**, where processing is necessary for safeguarding and protection from harm.

## Appropriate Policy Document

This Privacy Policy, together with our internal data protection procedures and Safeguarding Policy, meets the “**Appropriate Policy Document**” requirement under the Data Protection Act 2018.

We apply enhanced safeguards, including:

- Data minimisation
- Strict access controls
- Secure storage and encryption where appropriate
- Prompt deletion when no longer required

Where safeguarding concerns arise, information is shared **only where legally required or necessary to prevent harm**.

## 6. How We Use Personal Data

We use personal data to:

- Deliver programmes, activities, and services
- Communicate with participants, staff, volunteers, and partners
- Meet safeguarding responsibilities
- Monitor outcomes and evaluate impact
- Meet legal, financial, and regulatory requirements
- Apply for and report to funders and commissioners

We may share **anonymised or aggregated data** with funders for monitoring and evaluation. This data does not identify individuals.

We do **not** sell personal data, use it for marketing by third parties, or carry out automated decision-making or profiling.

## 7. International Data Transfers

We primarily store data within the UK or European Economic Area (*EEA*). However, some service providers we use may host data in the United States.

Where this occurs, we ensure appropriate safeguards are in place, including:

- **Standard Contractual Clauses (SCCs)** approved for UK use; and/or
- Certification under the **UK Extension to the EU–US Data Privacy Framework**.

These measures ensure personal data receives a level of protection equivalent to UK GDPR standards.

## 8. Data Retention Schedule

We do not keep personal data longer than necessary. Retention periods are reviewed regularly.

<b>Data Type</b>	<b>Retention Period</b>
Participant records	3 years after last contact
Safeguarding records	<b>Minimum 25 years</b> ( <i>in line with insurance and historical claim best practice</i> )
Financial records	6 years plus the current financial year ( <i>HMRC</i> )
Successful DBS checks	<b>Destroyed within 6 months</b> ( <i>record of pass only retained</i> )
Unsuccessful applicants	6 months
Mailing list data	Until consent is withdrawn
Equality monitoring data	Anonymised as soon as statistical use is complete

## 9. Data Security

We protect personal data through:

- Password-protected systems
- Restricted access on a need-to-know basis
- Secure cloud services with UK-GDPR safeguards
- Locked storage for paper records
- Confidentiality agreements for staff and volunteers

We apply particularly strict controls to data that could put women at risk if disclosed (e.g. *addresses of those fleeing abuse*).

## 10. Data Breach Procedure

A personal data breach includes loss, unauthorised access, or disclosure of personal data.

If a breach occurs that poses a risk to individuals' rights or freedoms, we will:

1. Contain and assess the breach immediately
2. Record it in our incident log
3. Notify the **Information Commissioner's Office (ICO)** within **72 hours**, where required
4. Inform affected individuals without undue delay
5. Review practices to prevent recurrence

## 11. Your Rights Under UK GDPR

You have the right to:

- Be informed
- Access your data
- Rectify inaccurate data
- Request erasure
- Restrict processing
- Data portability
- Object to processing
- Not be subject to automated decision-making

To exercise your rights, contact [info@herwayforward.co.uk](mailto:info@herwayforward.co.uk).  
We will respond within one calendar month and free of charge.

## 12. Complaints & ICO Contact

If you are unhappy with how we handle your data, please contact us first.

You also have the right to complain to the **Information Commissioner's Office (ICO)**:

- **Web:** <https://ico.org.uk/make-a-complaint/>
- **Telephone:** 0303 123 1113

## 13. Policy Approval & Review

**Approved by Board of Directors: 10/02/2026**

**Next review due: 10/02/2027**

This policy should be read alongside our Safeguarding Policy and internal data protection procedures.