

HerCommunity C.I.C.

Confidentiality & Privacy Policy

A public website policy explaining how we protect information, respect privacy and manage safeguarding limits

Policy type	Website / Public Policy
Version	1.0
Data Controller	HerCommunity C.I.C.
Data Protection Lead	Jodie Jasmin
Review frequency	Annually
Organisation	HerCommunity C.I.C. Company No. 17312071

Your Privacy Matters

At HerCommunity C.I.C., we understand that sharing personal information can feel difficult. We are committed to creating safe, respectful and supportive spaces where girls and young women feel heard, empowered and valued. We take privacy seriously and handle personal information in line with UK GDPR, the Data Protection Act 2018 and safeguarding responsibilities.

What Information We May Collect

- Name, preferred name, date of birth, age and contact details.
- Emergency contact details and parent/carer details where relevant.
- Referral information, support needs, wellbeing goals and attendance records.
- Accessibility, communication, health, disability or additional support needs where relevant.
- Safeguarding and risk information where there are concerns about safety or wellbeing.
- Equality and monitoring information where this is provided voluntarily.
- Feedback, evaluation, outcome and anonymised impact information.

We only collect information that is relevant to providing safe support, managing participation, meeting safeguarding and legal responsibilities, improving services and evidencing impact.

How We Use Information

Purpose	How information may be used	Likely lawful basis
Referrals and suitability	Reviewing support needs, eligibility, consent, risk and programme fit.	Consent; legitimate interests; legal obligation where relevant.
Providing support	Contacting participants, planning sessions, recording attendance, support	Consent; legitimate interests.

	goals and agreed actions.	
Safeguarding and risk	Recording and escalating concerns; contacting statutory or emergency services where needed.	Legal obligation; vital interests; substantial public interest.
Reasonable adjustments	Using access, health, disability or communication information to support safe participation.	Consent; explicit consent or substantial public interest for special category data.
Evaluation and impact	Using feedback and anonymised or aggregated data to improve services and report to funders.	Legitimate interests; consent where appropriate.
Governance and records	Maintaining records for accountability, complaints, insurance, safeguarding and legal purposes.	Legal obligation; legitimate interests.

Confidentiality

Information shared with HerCommunity C.I.C. will be treated confidentially wherever possible. We will respect privacy, store information securely, share information only on a need-to-know basis, and be honest about the limits of confidentiality.

Confidentiality is important, but it is not absolute. We may need to share relevant information without consent if there is a safeguarding concern, risk of harm, risk to another person, emergency, serious crime concern or legal requirement. Where possible and safe, we will discuss information sharing first.

Who Information May Be Shared With

- Children's Social Care, Adult Social Care, Early Help or safeguarding partnerships where there is risk of harm.
- Police, emergency services or statutory agencies where urgent safety action is required.
- Schools, colleges, NHS services, youth services or specialist support services where relevant to support or safeguarding.
- Insurers, accountants, IT/email providers, website providers or professional advisers where they support safe organisational operations.
- Funders and partners using anonymised or aggregated data to show reach, outcomes and impact wherever possible.
- Legal or regulatory bodies where HerCommunity C.I.C. is required to share information by law, court order, regulator, insurer or safeguarding process.

Only the information necessary to protect safety, provide support or meet legal and governance responsibilities will be shared.

Keeping Information Secure

- Password-protected devices, email accounts and storage systems.
- Restricted access so only authorised people who need information for their role can view it.
- Secure handling of referral forms, consent forms, safeguarding notes and evaluation records.
- Safeguarding records stored securely and separately from general participant records where practical.
- Anonymised or aggregated data used for impact reports wherever possible.
- Prompt action if a data breach is suspected, including reporting to the ICO and affected individuals where required by law.

How Long We Keep Information

HerCommunity C.I.C. keeps information only for as long as needed for support, safeguarding, legal, insurance, governance and accountability reasons. Retention periods may vary depending on the type of record and the reason it is held.

Record type	Retention approach
Referral and participant support records	Normally up to 6 years after support closes, unless safeguarding or legal reasons require longer.
Safeguarding records	Kept securely in line with safeguarding requirements and organisational retention arrangements; may be kept longer where risk, allegations or statutory processes are involved.
Consent and information-sharing records	Normally up to 6 years after support closes.
Evaluation and feedback	Normally up to 6 years; anonymised data may be kept longer for trend and impact reporting.
Website or enquiry communications	Kept only as long as needed to respond, evidence action and meet governance requirements.

Your Data Protection Rights

Under UK data protection law, individuals may have rights in relation to their personal information. These rights may include:

- The right to be informed about how information is used.
- The right to access personal information held about you.
- The right to ask for inaccurate information to be corrected.
- The right to request deletion where this applies.
- The right to restrict or object to some processing.
- The right to withdraw consent where consent is the lawful basis.
- The right to complain to the Information Commissioner's Office.

Some rights may be limited where HerCommunity C.I.C. has safeguarding, legal, insurance, public interest or regulatory reasons to keep or share information.

Photos, Videos, Testimonials and Future Contact

- Photos, videos and testimonials are optional and separate from taking part in support.
- No media or publicity content will be used without clear consent.
- Participants can say no to photos, media or testimonials and still access support.
- Future contact about events, follow-up or opportunities will only happen where consent has been given or where contact is necessary for current support, safeguarding or legal reasons.

Contact Us About Your Information

Data Protection Lead	Jodie Jasmin
Email	hercommunitywellbeing@outlook.com
Telephone	07309090307
In writing	Her Community C.I.C., 17 Croft Lane, Wolverhampton, WV10 8RG

ICO

ico.org.uk | 0303 123 1113

Young person friendly summary: We ask for information so we can understand what support might help, keep you safe, contact you in the right way and improve our programmes. We will try to keep things private, but if we are worried that you or someone else is unsafe, we may need to tell the right people who can help.

Review

This policy will be reviewed annually, or sooner if there are changes in law, guidance, service delivery, safeguarding practice or organisational learning.

Approved by	Director(s) of HerCommunity C.I.C.
Date approved	1 st July 2026
Next review date	1 st July 2027