



# Fair Processing Notice for Children and Young People

**FPN007**

**Version 1.0**

Hi, we're First Light. We are a charity which helps people who have been affected by domestic abuse and sexual violence across Devon, Cornwall and the Isles of Scilly, Swindon and Wiltshire.

As part of the General Data Protection Regulation (GDPR), which is a law about how we manage your information, we must tell you about how we manage the information we have about you and your family.

To help us give you and your family a compassionate, effective and high-quality service, we need to collect information about you and your family. This document will tell you what we collect, why we collect it and how we use it.

## Our contact Details

First Light is the operating name of First Light South West Ltd.

Our company number is 03440794.

Our charity registration number is 1090457.

Our registered address is: The Business Centre, Cattedown Road, Plymouth, PL4 0EG.

Our phone number is 03458 12 12 12.

You can email us on [info@firstlight.org.uk](mailto:info@firstlight.org.uk)

Our Data Protection Officer is Kristy Gouldsmith and she can be contacted on [dataprotection@firstlight.org.uk](mailto:dataprotection@firstlight.org.uk)

## What information do we use?

Because we help people and their families who have suffered from domestic abuse and sexual violence, we need to know things about you, your family and how you came to need our help. This is called personal data. We will store this information and keep it safe. We only share your information with people who are allowed to see it.

The kind of things we need to know, and record, are things like:

- Your name, address, phone number, date of birth and email address
- Your ethnic origin, where you were born, religion, sexual orientation, the language you speak and your nationality
- How you're feeling and how you behave



- How and when you came to be with us, and who referred you to us
- Any information you share with us
- The name address, telephone number and date of birth of your next of kin, family members or people you tell us about.
- The name address and telephone number of your doctor and anyone in social services who've been involved in your care or welfare
- When you started using our services
- When you stop using our services
- A record of any complaints or compliments made by you and what we do about it.
- Any medical treatment you receive and information about your physical and mental health
- We will also give you a unique client number
- How we should get in touch with you and if there are any special ways we should communicate with you

### Why do we need to use your information?

Good question -- we need to use your personal information so we can give you a compassionate, understanding, effective and high quality service which will support you and help us to meet our legal requirements.

We will use your information to:

- Provide you with the service you have asked for
- Keep in touch with you
- Protect your vital interests
- Answer any questions complaints or requests you have
- Keep a record of when you get in touch with us and your relationship with us
- Help us improve our service
- Help us to meet our legal obligations
- Tell the police, courts or other law enforcement agencies either if we are required to by law or if you tell us to.
- Tell the health services or social services like doctors, hospitals, healthcare professionals or social workers if we're required to or if you'd like us to
- Create reports about our work and our service
- Safeguard our staff and volunteers

### Our legal basis to use your personal information

By law we need to have a legal basis which is a legal reason to collect and use your information. The ones that we will use are consent, legal obligation, vital interests, public interest and legitimate interest. Here's what they mean:



**Consent** – This is where we ask your permission to use your information in a certain way and you say that it's okay. When we use your information in this way, you can tell us to stop whenever you want us to.

**Legal Obligation**- This is when we must share your information by law with people like the police or social services if we think that you are at risk of significant harm. This is from a law called the Children's Act. We also may have to share your information with people who regulate us, like the Charities Commission and the Information Commissioner. These are people who make sure that we are doing our job properly.

**Vital Interests** – This means we can use your information when we have to protect life or health. We might do this if we find out that there is a risk to you or someone that you tell us about. We would then tell the police, emergency services or social services.

**Public Interest** – This means that the government has decided that people need our services and they fund us so that we can provide these services to you. We need your information in order to give you advice and support.

**Legitimate Interest** – This means that we will use your information when we have to as long as it doesn't affect your rights. For example, we will keep your information in our systems so we can keep it more secure, use it and provide you with a service.

## What are special categories of Data?

This is information which tells us about your health, race, religious beliefs, political views, sexuality or your sex life, along with genetic or biometric information. We will only use this kind of information if we have to or we are allowed to by law. The only time that we will share this information is if you tell us to (you give us explicit consent), it's in your vital interest or if it's in the public interest.

## How do we collect and use your information?

We collect and use your information in a few of different ways and we'll go through them now. The following information we collect by consent. This is what you tell us about yourself and other people. Once you've given us this information, we might have another reason to use it.

- Your name, address, phone number, date of birth and email address
- How you're feeling and how you behave and how it's changed
- Any information you share with us
- The name address, telephone number and date of birth of your next of kin, family members or people you tell us about.



- The name address and telephone number of your doctor and anyone in social services who've been involved in your care or welfare
- A record of any complaints or complements made by you and what we do about it.

The following information we use is your special categories of data. We can use this because we are providing a service which is in the public interest.

- Your ethnic origin, where you were born, religion, sexual orientation, the language you speak and your nationality
- Any medical treatment you receive and information about your physical and mental health
- How we should get in touch with you and if there are any special ways we should communicate with you
- A record of any incidents which affect your health or welfare, we will keep a record of what happened and if you needed any medical treatment.
- A record of any medical care you receive including any treatment or surgical intervention.
- A record of your physical or mental health
- We will share your health data with other service providers if we need to

Sometimes we have a legal obligation to share your personal information with the police or social services or when it is in your vital interest. This is because we must obey the Children's Act, which is the law about making sure that you're safe. So, if we think that you're at risk of harm, we have to tell the police and or social services.

We also use information about other people, like your friends, family and anyone who is suspected of hurting you or your family. We have to use this information so that we can help you with counselling, advice and support.

If there is ever a legal dispute between us, we will share your personal information with our lawyers so that we can defend ourselves in court.

As part of our service we will use the following information as it's a legitimate activity, which means that we need it to provide our services.

- Your name, address, phone number, date of birth and email address
- How you're feeling and how you behave along with how its changed
- How and when you came to be with us, and who referred you to us
- Any information you share with us
- The name address, telephone number and date of birth of your next of kin, family members or people you tell us about.
- The name address and telephone number of your doctor and anyone in social services who've been involved in your care or welfare
- When you started using our services
- When you stop using our services



- We will also give you a unique client number.
- A record of any complaints or complements made by you and what we do about it.
- We will store all your information securely on our servers and in the cloud

### How long do we keep your information for?

As all of our services are commissioned (funded) by different organisations, how long we keep your information will depend on which First Light service is supporting you.

If you are supported by the **Devon and Cornwall Independent Sexual Violence Advisory Service (ISVA)**, then we will keep your information for 25 years. This is because the Independent Inquiry into Childhood Sexual Abuse (IICSA) requires us to. First Light is the data controller and Devon and Cornwall Police are the data controller. The service is commissioned (funded) by the Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly.

If you are supported by the **Plymouth Sexual Violence Therapeutic Service**, then we will keep your information for 25 years. This is because the Independent Inquiry into Childhood Sexual Abuse (IICSA) requires us to. First Light is the data processor and joint controllers with Plymouth City Council. The service is commissioned (funded) by Plymouth City Council.

If you are supported by the **Swindon and Wiltshire Sexual Assault Referral Centre (SARC)**, then we will keep your information for 25 years. This is because the Independent Inquiry into Childhood Sexual Abuse (IICSA) requires us to. First Light is the data controller and NHS England is the data controller. The service is commissioned (funded) by NHS England.

If you are supported by **Safer Futures (Cornwall and Isles of Scilly Integrated Domestic Abuse and Sexual Violence Service)**, we will keep your information for 20 years. This is a requirement of Cornwall Council who commission (fund) the service. We deliver this service in partnership with Barnado's. First Light and Barnardo's are the data processors and Cornwall Council are the data controller.

### Who do we share your information with?

As part of the service we provide, we share your information with several other services or organisations. This is because we either must by law or because we need to so that we can provide you with a service.

- Other parts of the health and social care system like hospitals, doctors, other healthcare professionals or social services.
- Organisations we have to by law in order to keep you safe
- The courts, the police or other law enforcement agencies, either by court order, by law



or if you tell us to

- Other specialist agencies or organisations if you want us to like Addaction, Stalking Advocacy, refuges or pet refuge etc
- Our legal advisors, our insurers and our consultants
- Our software and cloud service providers

### Where do we share your information?

We do not transfer any of your personal information outside of the UK.

### What rights do you have?

Because we are using your information, there are a number of things you have the right to as part of the GDPR. These are:

- To request to see any information we have about you and how we have used it
- To correct any information that may be incorrect
- To ask us to remove any information we have about you if:
  - We don't need it anymore
  - If we are using your information with your consent and you tell us you don't want us to anymore
  - If we no longer have a legal reason to use your personal information
  - If we are using your personal information unlawfully
- To object to us using your information
- To limit how we can use your information
- To ask us to send your information to another organisation

If you would like to talk to us about any of your rights, your personal information or anything else in this document please get in touch with Kristy Gouldsmith, who is our Data Protection Officer, on [dataprotection@firstlight.org.uk](mailto:dataprotection@firstlight.org.uk)

You can also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>