

## Privacy Notice for sharing of Police information under the Data Accelerator Programme

### (Supporting vulnerable children and families facing multiple disadvantages)

Information sharing between Avon and Somerset Police and South Gloucestershire Council gives a means of better understanding of vulnerability within the South Gloucestershire area and supporting the statutory functions of the agencies involved to provide support to vulnerable individuals. These include duties to prevent crime & disorder, promote the wellbeing of children and ensure safeguarding and improve public service delivery.

#### **The information we collect and use:**

We get most of the personal information we use from you and from what we learn about you through your interactions with us. In order to support delivering our services we also collect information from other sources like the Avon and Somerset Police.

Data processed under this Privacy Notice includes personal data such as Name, Date of Birth etc. and special category data such as Missing Persons data, Police incident data. It will also include where applicable criminal offence data.

All data is collected in line with the Purposes stated below, which allow the collection of information to derive vulnerable families. We use this information to produce a single view of a person.

The information is sensitive person level data, however it is only used at a case by case level and accessed primarily by professionals that are reviewing the need for the family or are actively working with the family allowing professionals to connect more quickly and reduce the need for the family to explain issues multiple times.

## **Purpose of Processing your information:**

The use of information from Avon and Somerset Police is to identify families at the earliest opportunity facing multiple disadvantages, the improvement or targeting of appropriate support to individuals or households and ultimately the improvement of the physical, mental, emotional, social or economic well-being of individuals and families.

This will make communities safer and reduce partner agency demand and cost. It allows safeguarding teams to make the best support and referral decisions, and to support existing interventions and manage vulnerable families. It also provides significant opportunities for strategic leaders to seek assurance that the most vulnerable and high-risk people in their area of command are effectively supported.

## **Why we need your information and how we use it:**

In order to deliver these objectives, it is necessary to share information between partners to support a range of services (Including, but not limited to, the Families Plus Team, YPS and Children's Social Care):

1. Identify families that would benefit from such interventions by identifying multiple engagements between families and public services.
2. Joining up information on caseloads to reduce duplication of effort and streamline service provision to ensure services are aware of who is currently working with vulnerable families.
3. Allowing for a shared understanding of vulnerability for all professionals engaged in supporting families by presenting a more holistic view of vulnerability as defined by both ASC and the Council.
4. Develop predictive risk modelling allowing intervention at the earliest opportunity (currently case finding only).
5. Evaluation to understand the impact and effectiveness of interventions (Secondary analysis).
6. Understand patterns and trends of need and vulnerability within the [add area covered by LA] population, including trend-based forecasting using depersonalised data. (Secondary analysis).

## **What is the source of your personal data:**

Information is currently received from Avon and Somerset Police to give the means of better understanding of vulnerability within the South Gloucestershire area and supporting the statutory functions of the agencies involved to provide support to vulnerable individuals. The sharing currently excludes routine information sharing from the Council to the Police and onward sharing to other relevant partner organisation.

## **Data Protection Statement:**

The Council is acting as the data controller concerning any personal information processed as covered in this privacy notice. This is defined in the UK General Data Protection Regulation and Data Protection Act 2018 and means that the Council is legally responsible for ensuring that it being processed complies with data protection legislation but also that the Council determines what your data is used for and why it is collected.

All authorised staff accessing data related to this privacy notice receive training to ensure they remain aware of their responsibilities when accessing and using your personal data. They are obliged in their employment contracts to uphold confidentiality.

Data relating to this privacy notice is only stored in the UK in a secure location and is not transferred to any other countries.

To provide this service, we have identified the following legal basis under the UK GDPR and legal gateways which allow us to process your data:

### Lawful bases for processing under the UK GDPR

- 6(1)(c)        Legal obligation
- 6(1)(e)        Public Interest/ Official Authority
- 9(2)(b)        Social Protection
- 9(2)(g)        Substantial Public Interest

### Legal gateways identified

Article 10 Condition relevant are as follows:

Processing in an official capacity.

DPA Conditions relevant for Local Authorities:

DPA 2018, Schedule 1 – Criminal Offence Data meeting specific condition; DPA 2018, 35(2)(b) – necessary for the performance of a task carried out for that purpose by a authority and in terms of sensitive data links to schedule 8 – statutory purpose, safeguarding of individuals.

Legal Gateways:

1. Care Act 2014 Section 1 and 3
2. Childcare Act 2006 - Section 1 - General duties of local authority in relation to well-being of young children
3. Children (Leaving Care) Act 2000
4. Crime and Disorder Act 1998 - Section 115
5. Crime and Disorder Act 1998 - Section 17 - Duty to consider crime and disorder implications
6. Crime and Disorder Act 1998 - Section 37
7. Criminal Justice Act 2003 - Section 325 of this Act details the arrangements for assessing risk posed by different offenders

8. Localism Act 2011
9. The Children Act 1989
10. The Children Act 2004 - Section 10 – Co-operation to improve well-being
11. The Children Act 2004 - Section 11 – Arrangements to safeguard and promote welfare
12. Welfare Reform Act 2012 - Section 131

We are always committed to protect your privacy and will only use information ethically and lawfully in accordance with the relevant legislation.

**How long do we keep your information:**

Data will be retained in line with the Council’s data retention policies whilst adhering to statutory demands such as the IISCA (Goddard Enquiry) and Supporting Families Payment by Results process.

**Your rights under the UK GDPR and Data Protection Act 2018 and access to your information:**

Keeping us updated of any changes

Please let us know if you change your address or contact details etc. so that we can keep your information up to date. If you have a concern about some of the information held on your record, you can contact us about it or request a copy of your record.

How to request a copy of your record

You can request a copy of your records via email [DPO@southglos.gov.uk](mailto:DPO@southglos.gov.uk) . Your request will be directed to our Information Governance team which will ensure that your request will be dealt with promptly.

If you would like more information about your records, please speak to the person providing your care or contact our Data Protection Officer.

The current UK Data Protection Laws provide you with the following rights:

Right	Description
The right to be informed	As a data controller, we are obliged to provide understandable and transparent information about the way we process your data (this is provided by our privacy policy).
The right of access	You are entitled to request a copy of the personal data we hold about you.
The right to rectification	You are entitled to request changes to information if it is inaccurate or incomplete.

The right to erasure	Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data.
The right to restrict processing	Under certain circumstances, you may ask us to stop processing your personal data. We will still hold the data but will not process it any further.
The right to data portability	Subject to certain conditions, you may request a copy of your personal data to be transferred to another organisation.
The right to object to processing	You have the right to object to our processing of your data where: <ul style="list-style-type: none"> <li>· Processing is based on legitimate interest;</li> <li>· Processing is for the purpose of direct marketing;</li> <li>· Processing is for the purposes of scientific or historic research;</li> <li>· Processing for public interest task/official authority.</li> </ul>

Please note that the above rights may not apply in all circumstances but we will respond within a month of any requests. If you have any questions or concerns about the information we hold on you, please contact our Data Protection Officer

Data Protection Officer, PO Box 1953, The Council Offices, Badminton Road,  
Bristol, BS37 0DB

[DPO@southglos.gov.uk](mailto:DPO@southglos.gov.uk)

**If you have any concerns:**

Please contact our Data Protection Officer if you have any concerns about how your information is being processed.

**Changes to your Privacy Notice:**

We will update this privacy notice from time to time to reflect any changes to our ways of working. Please contact our Data Protection Officer if you would like more information.

More information on how we process your information can be found on our website in the privacy section here: <http://www.southglos.gov.uk/privacy>