**Fair Processing Notice**

The Harbour Centre is a sexual assault referral centre (SARC) which provides free support to all those who have been affected by sexual abuse, both recently and in the past, and is staffed by a team of specially trained professionals. Our Forensic Nurse Examiners are provided by Mountain Healthcare who specialise in the provision of
​Sexual Assault Referral Services. The Harbour Centre is committed to maintaining the confidentiality and rights to privacy of all our service users and staff across the services we provide. We take our responsibilities for data protection seriously and maintain robust processes to safeguard the personal information we hold in order to carry out our business. This document explains how we collect, process, transfer and store the personal information of our service users and staff which forms part of our accountability and transparency under the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

**How we will meet the principles of GDPR and Data Protection Act 2018**

In order to meet the principles of GDPR and the Data Protection Act 2018, we will ensure that we seek a lawful basis for collecting, processing and sharing personal information. We prefer to do this through ensuring we obtain consent from the individual. However, in some cases we may be required to process and share information by law and/or to keep individuals safe from harm. This document outlines what information we may collect and who it will be shared with. We will always make sure that individuals are made aware of the reasons for which their data is being collected. The Harbour Centre will only collect and process information which is necessary for carrying out their services, and we will make every reasonable effort to keep information accurate and up-to-date. We will only keep records for as long as necessary and will take guidance on this from NHS England and the Police. All information held by The Harbour Centre will be stored securely, with appropriate security measures in place.

**What information will we collect from you?**

Professionals working with you during the course of your care – such as Forensic Nurse Examiners, Crisis / Support Workers and Sexual Offence Examiners - keep records about the care and treatment you receive and any forensics interventions that have been undertaken. This may include:

* Basic details such as name, address, date of birth, phone number, and email address – where you have provided this to us, to help us to contact you
* Details of people attending the SARC with you for your appointment
* Details of your next of kin, and their contact details to help us to contact you
* The reason you have attended the SARC, including details of what has happened to you
* Notes and reports about your physical or mental health and any forensic interventions which we may undertake during your time at the SARC
* Results of any tests we refer you to, where this service is provided
* Information about the onward referrals we make to other support and healthcare services, including your GP, sexual health and ongoing support services
* Any feedback you provide to us about your experience of your service.

**Why do we collect this information about you?**

Your information is used to guide and record the care you receive, and to support the Police in their investigation if you have reported to them. It is vital in helping us to:

* Have all the necessary information to assess your needs and make decisions about your care
* Have details of our contact with you, such as referrals and appointments so we can see the services you have received
* Assess the quality of the care we give you, and all our services users
* Properly investigate if you and your family have a concern or a complaint about your care
* Assist the Police in their investigation, if you have reported to them

**Who might we share your information with?**

Information to assist in the provision of your care and support will be shared with the team who are caring for you within the SARC and to follow up on your care once you have attended.

Because the SARC and other agencies work together, we may need to share information about you with other professionals and services involved in your care. This may include:

* Sexual Health services provided by the NHS or private healthcare organisations
* Your GP
* Social Services
* ISVA (Independent Sexual Violence Advisor) Services
* Therapeutic/Counselling Services​

We share information to ensure that you receive the appropriate healthcare and support services following your visit to the SARC.  We will only share your information if you give us your consent and it is considered necessary. You have the right to refuse or withdraw your consent to information sharing at any time. Please discuss this with a member of the SARC team at the time or once you have left our service, as this may impact on the care you receive from other services.

It is important to note that a person’s right to confidentiality is not absolute and there may be circumstances when we must share your personal information from the records we hold with other agencies. In these circumstances we are not required to have your consent, examples of this are:

* If there is a concern that you at risk of serious harm
* If there is a concern that the public are at risk of serious harm
* If there is a concern that a child, under 18, is at the risk of harm

If you have reported to the Police, we will share information with them to assist in their investigation. This may include us writing and sharing a statement with the Police at a later date.

We may be required to share the information we hold about you with the courts without your consent, if we receive a court order from a judge.

**Monitoring and Improvement of Services**

The Harbour Centre is required to provide reports to our Commissioners and the Police about the services we provide, this monitors our performance and enables them to assure that the SARC continues to provide the highest possible level of care to our service users and their families.   The information we provide in these reports is anonymous, so you cannot be identified and all access to and use of this information is strictly controlled. Mountain Healthcare undertakes yearly audits of our client’s records which are carried out by a small internal team of clinical staff in a strictly controlled manner. Any information provided in reports about our audits is made anonymous.

**Research, Training and Education**

The Harbour Centre is actively engaged in research to help us provide the best possible care, inform how we run services in the future, shape policies and improve the experience of clients and their families.

If we use your information as part of our research we remove any personal data such as your name, which would identify you.

As part of the training and development of our clinical staff, Mountain Healthcare will sometimes look at medical records however, your personal information will not be shared.

We will ask you for your consent to do this whilst at the SARC, but if you change your mind and do not want your records to be used for research, training or education then you can contact us to withdraw your consent.

**How do we keep your information safe?**

The Harbour Centre takes the privacy and security of all personal data under its control very seriously and takes every reasonable measure and precaution to protect and secure the personal data that we process. We use a variety of physical, technical and procedural measures to protect personal information from unauthorised or accidental disclosure, loss or corruption.

All employees are legally bound to respect your confidentiality and receive yearly training to ensure they are aware of and up to date with their responsibilities surrounding information governance standards.

We are guided by our Commissioners and the Police about how long records about your care should be kept. [The Records Management Code of Practice for Health and Social Care Act 2016](https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016) sets out best practice guidance on how long we should keep your information before we are able to review and securely dispose of it.

**Do I have any rights regarding the information you hold about me?**

Individuals have a number of rights enshrined in the GDPR and Data Protection Act 2018, including the right of access to information held about you, both on paper and electronically. There are some exceptions to this however, which include:

* If information has been provided about you by someone else and they have not given their permission for this to be shared with you
* The information is considered to have the potential to cause mental or physical harm to you or someone else

All requests must be made in writing to The Harbour Centre, and we will require you to provide proof of identity before we can disclose your personal information.

You can email us contact@theharbourcentre.co.uk or call 01603 276381

If individuals have any concerns regarding the way their personal data is handled by The Harbour Centre or the quality (accuracy, relevance, non-excessiveness etc.) of their personal data, they are encouraged to raise them with the Data Protection Officer (DPO) using either of the methods provided above.

If any of the information we hold about you is incorrect or misleading, we will ensure it is thoroughly assessed and corrected where appropriate.

The Information Commissioner is the independent regulator responsible for enforcing the legislation and provides advice and guidance about the requirements. The Information Commissioner’s Office (ICO) can be contacted via the following:

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) / 01625 545 745 (national rate)

Website: [www.ico.org.uk](http://www.ico.org.uk)