

The Drive Partnership – Privacy Statement

The Drive Partnership is a partnership between Respect, SafeLives and Social Finance.

Staff, systems and governance supporting the partnership’s work are spread across all three organisations, therefore personal information that we process is held in line with the privacy policies for each organisation respectively, but shared between the organisations.

Any queries regarding how we deal with personal information, or this notice, can be referred to info@drivepartnership.org.uk

Privacy policies for partnership organisations:

- Respect: www.respect.org.uk/pages/privacy-policy
- SafeLives: www.safelives.org.uk/privacy-policy
- Social Finance: www.socialfinance.org.uk/privacy

How we respect privacy when we deal with personal information

This Privacy Notice applies to information we – The Drive Partnership – collect about individuals who interact with our organisation. It explains:

- what personal information we process under what circumstance
- our legal bases for processing information
- how we use your data
- when we share your data
- how long we keep your data
- rights you have over your data
- why we use cookies on our website
- implications around modifications to this Notice.

Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Legal Basis	How we store your information
You are making a general enquiry or a complaint	Name, email, message	Consent – you have given your active consent.	Stored in the email inbox to which you submit the request. Emails are deleted after 6 months.
You are making an	Name, email,	Legitimate	Information is passed on to the

information request to us	message	<p>interests – it is necessary for us to read and store your message so that we can respond in the way that you would expect.</p> <p>Consent – you have given your active consent.</p>	necessary person to answer questions. Stored in the email inbox to which you submit the request
You are sending us a direct message or private message via social media	Name, message, social media handle	Consent – you have given your active consent	Information is stored in the inbox of the social media account you have contacted. All social media accounts are password protected.
You are completing a feedback form or survey with us	Name, email, job title, employer and demographic data, unless otherwise specified (e.g., 'this survey is anonymous')	Consent – you have given your active consent	Information is stored on the survey platform and in a secure location in our IT filing structure.
You wish to attend, or have attended, a training course or event.	Name, email, job title, employer	Consent – you have given your active consent.	This will be held on a web-based service accessed by password by organisers.
You have signed up to receive news and updates from The Drive Partnership.	Name, job title, email address	Consent – you have given your active consent.	Stored securely in a password-protected online email creation platform.
You have registered to access our resources for professionals.	Name, job title, email address	Consent – you have given your active consent.	Stored securely via password-protected website CMS system.
You have sought support and	Personal details, family details,	Consent – you have given your	Anonymised information is stored in password protected folders

guidance via email as a professional who is working with perpetrators of domestic abuse	lifestyle and social circumstances	active consent.	
You are using our website (See section 6 for further detail)	Website activity collected through cookies	Consent – you have given your active consent.	This data is anonymous and is stored by Google.

How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this Notice.

For example, we may use your personal information to:

- reply to enquiries you send to us.
- Book you onto a training session, workshop, or any other event that we advertise through our website or online channels.
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.
- understand what aspects of our work people are interested in supporting. Information is analysed anonymously, and it will not identify you.
- fulfil our administrative requirements (for example, completing Gift Aid returns). We may also use your data for analytical purposes however you will not be identified when data is used for this purpose as the data is anonymous.

When we share your data

The Drive Partnership is a partnership between Respect, SafeLives and Social Finance, with staff, systems and governance spread across all three organisations. Therefore personal information that we process is held in line with the privacy policies for each organisation respectively, but shared between the organisations.

We may share your personal information with third parties where required by law, where it is necessary to administer a contract or agreement with you, to provide a benefit, or where we have a legitimate interest in doing so.

We will only pass your data to third parties in the following circumstances:

- You have provided your explicit consent for us to pass data to a named third party, if required;
- We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors;
- We are required by law to share your data e.g. required by a court of law or the police;
- Where there is a risk that you or someone else is at risk of immediate and significant harm. Where this is the case we will try and notify you of this prior to sharing information unless we believe this would cause an additional significant risk to you or another person.

All of our third-party service providers are required to take appropriate security measures to protect your personal data in line with Data Protection legislation. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

How we store your personal information and for how long

Your information is securely stored on our secure email server, IT filing systems and password-protected cloud-based platforms.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once data is no longer required we will securely it in accordance with applicable laws and regulation.

Rights you have over your data

Under data protection law, you have rights including:

- **Your right of access** – You have the right to ask us for copies of your personal information. All subject access requests will be dealt with by the Data Protection Officer and any requests received will be passed to them immediately. If the initial request is not in writing, the person will be

immediately asked to put the request in writing, or the request will be forwarded directly to the Data Protection Officer who will do so. However, the fact that a request is not made in writing will never be used as a means of delaying the response. We are obliged to fully respond to any subject access request within 30 days which can be extended for a further two months.

- **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@drivepartnership.org.uk if you would like to access the rights listed above, or any other legal rights you have over your data under current legislation.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact details at the top of this policy.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website. By continuing to browse our websites, you agree to our use of cookies.

We use the following cookies:

- Strictly necessary cookies
These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- Analytical/performance cookies
These cookies allow us to recognise and count the number of visitors to our website, and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.
- Functionality cookies
These are used to recognise you when you return to the website and record that you are a user of our website, or whether your web browser has Javascript enabled.

Disabling cookies

You block cookies by activating the setting on your browser that allows you to refuse the settings of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site.

Web browsers may allow some control of most cookies through the browser settings. You can find out more about cookies, including how to see what cookies have been set and how to manage and delete them at www.aboutcookies.org. For information on how to do this on a mobile phone, please refer to the handset instructions.

Our websites may also include links to other websites, not owned, associated or managed The Drive Partnership. While we try our best to link only to reputable websites, we cannot be held responsible for the privacy of information collected by sites not managed by us, nor can we accept responsibility or liability for them. For this reason, you should consult the privacy policy on any external website before you submit any personal information to those websites.

Modifications

We may modify this Privacy Notice from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

Policy review

This Privacy Notice will initially be reviewed after 12 months; from thereon, every 3 years.

Next review date: 01/08/2024