

Welsh Women's Aid

Privacy Notice for Course Attendees

This Privacy Notice explains how the training team at Welsh Women's Aid (WWA) will use your personal and special category data, who it will be shared with, and the purpose for sharing. Your personal data is defined as any information that can directly or indirectly identify you. This privacy notice explains how we keep your data safe and secure and includes information you need to know about your rights and how to exercise them.

1.1 What information do we collect?

- Name
- Gender
- Job title and workplace
- Email address
- Phone number
- Dietary or accessibility requirements (*optional*)
- Invoicing information
- Local Authority / Region *
- Regional Co-ordinator *
- Line Manager *
- Department
- Ethnicity*
- Age *

*Specific to any accredited courses awarded by Agored Cymru or NOCN as required information as part of the training.

For learners attending an accredited course, additional personal data will be collected in order to process accreditation:

- Date of birth
- Gender
- Ethnicity

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Pendragon House, Caxton Place | Pentwyn, Cardiff | CF23 8XE

Tel: 02920 541551

info@welshwomensaid.org.uk | www.welshwomensaid.org.uk

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and a company limited by guarantee registered in England and Wales, No. 07483469

- Disability/learning disability
- Home address, including postcode

These details are required by the awarding body.

During the course we may also use online collaboration platforms such as but not limited to, JamBoard to enable virtual collaboration.

1.2 Why do we collect information about you?

We must collect and hold your personal and special category data to manage the following where appropriate:

- Course and event administration
- Accreditation purposes
- Course payment (*if applicable*)
- Pre- and post-course correspondence.

Learners on the courses listed below will be contacted 6 months and 12 months post course to complete an evaluation form to assess the impact of training and record any practical improvements made.

- Domestic Abuse Awareness for British Sign Language Interpreters
- Understanding the Experiences and Effects of VAWDASV on Deaf Survivors.

To collect personal and special category data WWA needs a lawful basis for processing under Article 6 and Article 9 of the UK GDPR. For the processing of personal data, WWA will rely on the following lawful basis:

- a. **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests. Whenever we use Legitimate Interest to process data, we perform a Legitimate Interest Balancing Assessment (LIA) to enable us to consider any potential impact on you (both positive and negative), and your rights under data protection laws. Your information will not be processed if our interests as a charity override your fundamental rights and freedoms according to the law.

- b. **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- c. **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

To process special category data, WWA will be relying on the following condition for processing special category data:

- (A) **Explicit consent:** clear, informed consent has been freely provided for a specific purpose by statement or by a clear affirmative action which signifies agreement to the processing of data.

1.3 What do we do with your information?

Your information is held securely on Microsoft SharePoint, Airtable or local machines accessible only to personnel who require the information to carry out the processes listed in 1.2.

WWA is certified under the Cyber Essentials scheme, for more information please visit www.cyberessentials.ncsc.gov.uk/ or contact DataProtection@welshwomensaid.org.uk. We have undertaken a third-party supplier assessment on all our suppliers and have identified a low risk when using these organisations. Such decisions are assessed on a regular basis and our findings are kept for record purposes. Hard copy information is stored securely at the Welsh Women's Aid's head office.

1.4 How long will we keep your information?

The table below provides further details about how long your personal and special category data will be held. These are in line with Agored Cymru and NOCN recommendations.

Training type	How long do we keep your information?
Agored Cymru Level 2 accredited training	6 years from the course internal verification date ¹
Agored Cymru Level 3 accredited training	6 years from the course internal verification date ¹
NOCN Level 3 accredited training	7 years from the course internal verification date ¹
Continuing Professional Development Service (CPD) *See website for list of CPD courses: www.welshwomensaid.org.uk/training/courses/	3 years from the course start date
E-learning (CPD accredited and non-CPD accredited)	3 years from the course start date
Non-accredited training	3 years from the course start date

We review our retention periods and update our Records of Processing Activities (RoPA's) accordingly. If you would like to know more about the retention of your personal information, please email the Data Protection team via: DataProtection@welshwomensaid.org.uk.

1.5 Who do we share your information with?

We share data with the following and relevant awarding bodies for accredited courses or platforms, when necessary, e.g., to deliver training to you and provide certification². We may also utilise associate trainers to deliver training, and associate assessors to aid in marking, and your information will be shared with them when necessary. We are also required to undergo External Quality Assurance; in some instances, your details may be shared as part of that

¹ Internal Quality Assurance uses a sample of assessed work to ensure all assessments and marking across all courses and units are consistent.

² This information is necessary for the registration of learners with the appropriate awarding body and to guarantee that learners can be identified.



assessment. The table below provides more details about what information is shared and with whom:

Training type	What information will we share?	Who do we share your information with?
Agored Cymru Level 3 accredited training: - Understanding Sexual Violence - Understanding children and young people's experiences of VAWDASV	Name, email address, gender, ethnicity, disability/learning disability, date of birth and home address, including postcode. Reasonable adjustments requests.	Awarding body: Agored Cymru
Agored Cymru Level 3 accredited training: - Ask and Act training	Name, email address, gender, ethnicity, disability/learning disability, date of birth and home address, including postcode. Reasonable adjustments requests. If attended the course. If submitted workbook. When passed course and achieved certificate.	Awarding body: Agored Cymru Line Manager Regional Co-ordinator
Agored Cymru Level 2 Accredited Training - Train The Trainer - DASH MARAC (Understanding domestic abuse, multi-agency risk assessment conference)	Name, email address, gender, ethnicity, disability/learning disability, date of birth and home address, including postcode. ² Reasonable adjustments requests.	Awarding body: Agored Cymru



Training type	What information will we share?	Who do we share your information with?
NOCN Level 3 Accredited training: - NOCN Level 3 Certificate in Preventing and Tackling Domestic Abuse	Name, email address, date of birth and home address, including postcode. ² Reasonable adjustments requests.	Awarding body: NOCN group
Continuing Professional Development Service (CPD) *See website for list of CPD courses: www.welshwomensaid.org.uk/training/courses/	Names, email address, date of birth, home address including postcode and workplace. ²	Awarding body: The Continued Professional Development (CPD) Service
E-learning courses (CPD and non-CPD)	Name, email address, workplace. Learners will also be asked to provide additional demographic information (optional).	E-learning platforms for access to courses. For CPD accredited courses, your data will also be shared with the awarding body: The Continued Professional Development Service.
Non-accredited training	Name, email address, workplace,	Data is not shared externally, with the exception of our associate trainers.
General: For funded courses we may share anonymised personal data with the funder for reporting purposes.		

We may share your name, email address, job title, and workplace details with your employer or regional coordinator for record-keeping purposes. Attendance data, including course participation, non-attendance, and late cancellations, may also be provided. For accredited courses, assessment status will only be shared after you have been informed. Possible

statuses include Passed, Resubmission Required, or Awaiting Submission. No other detail will be provided.

There may be certain circumstances where we would be required to share your information externally without your consent, for example, where we are required to do so by law, to safeguard public safety, and in risk of harm or emergency situations. We will only share the minimum information for the purpose, on a need-to-know basis, and with appropriate individuals.

1.6 What are your rights?

You have the right to:

- **Information:** Individuals have the right to be informed about the collection and use of their personal data (this privacy notice). This is a key transparency requirement under the UK GDPR.
- **Access:** Ask to see the information about you that is held by WWA (also known as a Subject Access Request).
- **Rectification:** Have information about you changed if it is not correct.
- **Restriction of processing:** Restrict the processing of some or all your information if it is deemed to be inaccurate or we are not lawfully allowed to use it.

In addition, the following rights apply only in certain circumstances:

- **Avoid automated decision-making:** Question decisions made about you by a computer.
- **Erasure:** Ask for us to delete some or all your information we hold about you (subject to our contractual and/or legal obligations).
- **Portability:** The right to data portability.
- **Withdraw consent:** You can withdraw your consent to process your data at any time (if consent is our lawful basis for processing your data) by contacting us via dataprotection@welshwomensaid.org.uk.

To exercise any of these rights please contact dataprotection@welshwomensaid.org.uk.

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If you are unhappy with the way your request is handled or disagree with a decision made by WWA regarding your data, you can submit a complaint. In these circumstances you can contact the Data Protection Team and request a review of the decision by emailing dataprotection@welshwomensaid.org.uk.

If you are not satisfied with any outcome from the data protection team, you may wish to apply to the Information Commissioners Office at:

The Information Commissioners Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate)

1.7 Changes to policy

We review this policy annually and may update it from time to time. If we make any significant changes in the way we treat your personal information, we will make this clear on our website or by contacting you directly.

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