

CVH Privacy Statement and Data Protection Policy

Date approved by BOD	Date of last review	Date for next review
March 2018	March 2025	March 2027

At Crime Victims Helpline (CVH), privacy is at the heart of what we do. We are committed to protecting your privacy and the personal information that we hold. The purpose of this statement is to be clear and transparent about how CVH uses your personal information, whether you are using our service, interested in volunteering or just browsing our website.

Who are we?

CVH offers support to all victims of crime in Ireland by listening, supporting and informing. CVH is registered as a company under company number 409235 and is a registered Charity (16894/20061890).

Within this Privacy Statement ‘we’ and ‘us’ means CVH. CVH is the data controller under the data protection laws.

Which laws apply to us?

Your ‘personal information’ is information that can be used to identify you. This can include your name, email address, postal address, telephone number, date of birth and credit/debit card details, as well as ‘sensitive personal information’ such as details about your ethnic origin, political opinions, religious beliefs, physical or mental health and details of criminal offences. CVH collects, stores and handles personal information for a variety of purposes, including to manage our volunteers, to process donations made to us, to engage with our supporters and to provide our services to the public.

The following laws apply to CVH, as an organisation that collects, stores and handles personal information:

- the Data Protection Acts 1988 to 2018
- the General Data Protection Regulation (EU) 2016/679
- the 2011 “ePrivacy Regulations” (S.I. No. 336 of 2011 – the European Communities (Electronic Communications Networks and Services) (Privacy And Electronic Communications) Regulations 2011)

We will handle your information in accordance with these laws.

How we use personal information

If you use CVH services

CVH supports people who are victims of crime, their family and friends.

In general, we try to keep as little information about you as possible. The information we record will be used to provide you with the best possible service and supports and will be

treated with care. We share information within CVH, because we work as a team and we want to ensure that whoever you speak to is up to date with your situation. This can be helpful if you find it difficult to go over previous conversations or if you are going through a particularly difficult time.

We will record your phone number if you consent to receiving a call back from us or if you leave a voicemail asking for us to call you back. As well, we will record your postal address or email address if you request for us to send you resources or information through the post or over email. We will only record the information you specifically provide to us and use it only for the purpose for which you provided consent.

It may sometimes be possible for us to view the phone number you are calling from when you call or leave a voicemail on the helpline. We will not record or use this number without your consent except in situations where policy dictates that we make a report to the Gardaí or Tusla.

Any information that we have about you is securely destroyed/deleted no later than 90 days after our last contact with you.

We don't record phone calls or meetings. From time to time volunteers and staff may observe for training, support, or research purposes.

We record some statistical information on each contact we receive, to report on and improve our service. This includes non-identifiable information, such as gender, county level location and type of crime experienced. This information is never used to report on specific people.

CVH will never pass any of your information on to any other organisation, except in the following situations:

1. You make threats, either verbally or in writing, to commit violence against an individual, organisation or entity.
2. We receive a court order requiring us to share information
3. We are working in partnership with another organisation and you have given consent for your information to be shared
4. You directly ask us to pass on information about you to another organisation or person.
5. You threaten the safety of our volunteers or staff.
6. You misuse or compromise the delivery of our service, for example by making it difficult for other people to access our services
7. We have child protection and welfare concerns. Our service has a duty of care to report any child protection and welfare concerns to Tusla (Child and Family Agency) and/or the Gardaí. These concerns might arise from a disclosure by a service user or through something that we observe.
8. If a volunteer or staff member has reasonable concerns that you are in imminent danger, we will contact the appropriate service to request an intervention.

Limiting or withdrawing access to our services

From time to time we have to make decisions to limit an individual's access to our services.

For example:

- If a person contacts us a lot in a short period of time we may need to manage their access to our service to ensure that others are able to contact us.
- If they are abusive or threatening towards staff members and/or our volunteers.

A decision to limit access to our service or contact the Gardaí will be determined in line with our *Policy on Management of Threatening and Abusive Service Users*. You can find a copy of the Policy on the CVH website (www.crimevictimshelpline.ie) or be sent one by request.

Research

From time to time we carry out research into effective ways of providing support to people who are victims of crime and the needs and experiences of people using our services. We use this to help us develop our services and to inform our work in influencing government policy. This research may be carried out by CVH staff or volunteers, or external research teams that are supported or commissioned by us.

CVH requires informed consent from all individuals for all activities that involve contact between researchers (whether these are CVH staff, volunteers or staff from an external institution) and research participants. This means that participants must be fully informed about the project, including how any personal data provided will be used and the degree of anonymity and confidentiality provided, before agreeing to take part. Participants must provide positive consent (which may be written or verbal) that they are happy with how their data will be used before proceeding.

All electronic and hard copy data collected during research is stored securely and is accessible only by the designated researchers and for the purposes of the research project. Data is stored for a duration of time specific to each research project but will not be kept longer than is necessary for the purposes of that project. Once the data is no longer needed, it is destroyed.

From time to time CVH researchers use externally hosted websites to conduct surveys. These websites may be hosted in countries or jurisdictions which do not provide the same level of data protection as the countries within the European Economic Area. You will be told if a website is hosted outside of the European Economic Area before you begin the survey, as well as other information about the purpose of research and how your data will be used. You will also be provided with a link to the survey host's privacy statement. All survey participants are required to indicate that they consent to take part before they proceed to complete the survey, so by agreeing to take part, you will be providing consent to the use of your personal details and sensitive personal data (such as information about your emotional wellbeing) and the transfer of your data outside of the European Economic Area (where applicable).

If you would like to volunteer with CVH

CVH is a national service operating across the Republic of Ireland from a base in Dublin although we have technology that allows for remote access and delivery of service.

CVH needs to collect, use, store and share certain information about applicants and volunteers to manage their application and involvement with the organisation. The need to use applicant and volunteer information in this way is known as a 'legitimate interest' of CVH and is the lawful basis upon which CVH handles personal data for these purposes.

This section sets out how your personal data will be used by CVH to administer and coordinate your application and volunteering with us.

If you are interested in volunteering with CVH, you can contact us through our website (www.crimevictimshelpline.ie), over the telephone, or email (hello@crimevictimshelpline.ie), or at events. You will be asked to give us your name and contact information so that we can contact you in relation to your enquiry.

If you wish to proceed, you will be required to complete an application form. CVH will use the information you provide to assist you with any queries you might have regarding your volunteering application and to ask you about your experience of applying to volunteer with us.

The information you provide on your application form will be used to help make a decision about whether you will be accepted on to a CVH training course. You may be asked for information about your age, disability, gender, employment status and ethnicity (known as 'sensitive personal information') to help CVH with equal opportunities monitoring. You are not required to give this information, but if you do, the CVH will use it for the purposes of managing your application and involvement with CVH and equal opportunities monitoring only.

CVH requires the provision of referees who will be contacted to assist in the volunteer selection process. You will be notified and asked for your consent before your referees are contacted.

During your period volunteering with CVH any further personal information will be treated in the same manner as is indicated above.

CVH will keep your personal information confidential except if we are required to do otherwise by a regulator, law enforcement body, or by court order.

We will never sell or give your personal information to other organisations to use for their own marketing purposes.

From time to time, former volunteers request a statement of service or a reference from us. We will keep your name (first and surname) and volunteer start date and finishing date for five years after your last active volunteer involvement in order to facilitate these requests.

In the event you are not offered a volunteer role with CVH, the personal information and documentation you provide to us during the application process will be securely destroyed within 28 days of notification on the outcome of your application.

All volunteers and staff are required to undergo Garda vetting before undertaking work on the helpline. Garda vetting follows the procedures outlined in the Garda Vetting Policy which is available upon request.

If you donate to CVH

Should you donate money to CVH, we need to collect and use certain information about you in order to process your donation. This could include your name, email address, postal address, and/or phone number.

If you donate to CVH via the *iDonate* online fundraising platform, they will pass on your information to us to allow us to record and process your donation. We will contact you to confirm that we have received your donation. Make sure you read the fundraising platform's own privacy policy, as that will tell you how they use your information for their own purposes. Record of your donation will remain in CVH files for accounting purposes.

If you apply for a job or are employed by CVH

We collect a range of personal data about staff and applicants for job roles. This is to establish that you are competent and appropriately qualified to work or have work experience in our work environment. This includes your name, date of birth, address, details of your next of kin, official photo identification, your PPS number. In addition, with your consent, we will collect further medical and health details and other information relevant to the type of work you will be involved in.

Job applicants will provide the above data except for Date of Birth, Details of Next of Kin, PPS number, official ID, and Health Details. This information is only sought for successful applicants.

Why We Need Data/Purpose of the Processing

We need your personal data to ensure that you are qualified and able to work for us. We will not collect any personal data from you that we do not need to oversee your ongoing employment.

What We Do with Data/Disclosure

All the personal data is processed by authorised persons (management or those designated by management). To run our operation and deliver a service, we may need to share your details with:

- External personnel such as payroll, tax, legal and HR contractors, other professional advisors
- Revenue Commissioners
- Workplace Relations Commission
- An Garda Síochána

No other third parties will have access to your personal data unless the law allows them to do so.

How Long We Keep Data/Retention Period and Criteria Used

CVH will keep your basic personal data for as long as you remain an employee, and where necessary will continue to hold information on former employees for legal and administrative purposes.

Completed application forms for unsuccessful candidates are disposed of within twelve months of completing the hiring process.

If you visit our website

Information We Collect

Our website (which is hosted by a third party) automatically collects data that your web browser makes available when you visit our sites (e.g., your geographic location, and information about the website that you visit before and/or after visiting the site).

Disclosure and Use of Information We Collect

We use the data which is automatically collected by our site to run and maintain our sites and generally learn about the usage of our sites. We may disclose this information to any third party for any purpose.

Links to Other Websites

While you are using our sites, you may be linked or directed to other third party sites that are beyond our control. Each of these third party sites may have a privacy policy different from ours. Please review the privacy policies of these sites. We are not responsible for any actions or policies of such third parties.

Cookies Policy

CVH uses cookies to enhance your experience when browsing our sites. We use the information gathered from cookies to help us to identify problems, fix errors and to improve our page designs. We do not use cookies to store personally identifiable information such as your name, address or credit card details.

We are sharing this information with you to comply with European legislation, but more importantly to ensure that we're honest, clear and upfront about your privacy when using our website.

Removing cookies

If you want to prevent cookies from being stored on your computer in future, you may do so by referring to your internet browser's instructions.

If you register to attend a CVH event

If you register to attend a CVH event through a third party event organiser (eg: EventBrite), they will pass your information to us so that we can administer your registration. Make sure you read the platform's own privacy policy, as that will tell you how they use your information for their own purposes.

If you visit the CVH office

CVH operates from Government premises that operate CCTV systems, so you may be recorded should you visit. CCTV is installed for security to protect all people accessing and working within the building complex; including you, CVH staff and volunteers, as well as the other agency staff, representatives and clients delivering services from the building complex. The CCTV will be managed and operated in line with the policies and procedures of the building owner or delegate within the provisions of relevant legislation. CCTV footage will only be viewed when necessary (for example to detect or prevent a crime) and is only stored on a temporary basis, other than where it has been flagged for review.

Storing your information

CVH operates across the Republic of Ireland and stores our data within the European Economic Area (EEA).

Security safeguards

CVH uses various technical and organisational measures to keep your data safe. Electronic data and databases are stored on secure computer systems and we control who has access to information, using both physical and electronic means. Our staff and volunteers receive data protection training and are provided with guidance that they are required to follow when handling personal information.

Although we do our best to keep your information safe, the transmission of information over the internet is never completely secure, so please bear this in mind when you share information with us via our website or over email.

How long we keep your personal information for

We only keep your personal information for as long as required, depending on what it was collected for, and in accordance with legal requirements and tax and accounting rules.

If you have told us that you don't want to be contacted by CVH, we will record this to ensure that we do not continue to contact you.

Your rights

The data protection laws give you certain rights over your personal information and how we use it. These include:

- the right of access to a copy of the information that we hold about you;
- the right to ask us to correct inaccurate information that we hold about you;

- the right, in certain circumstances, to object to specific uses of your data; and
- the right, in certain circumstances, to request the information that we hold about you to be deleted.

If you wish to exercise any of these rights, please:

- Put your request in writing and email it to info@crimevictimshelpline.ie or send it for the attention of the Company Secretary at Crime Victims Helpline, 6/7 Hanover Street East, Dublin 2, Co Dublin, D02 W320.
- Provide proof of identity including your name and postal address. If you are requesting information relating to your use of the helpline, we will ask you for information about your contacts with CVH including dates of contacts.

Help us to respond to you as quickly as possible by being specific about which information you would like to receive a copy of or that you would like us to amend/delete. Please note:

- Responses will be sent by registered post or email (if this is preferred).
- If we are unable to verify your identity, for example if you contact the service anonymously or use a different name to do so, it may not be possible to provide you with the information requested.
- CVH is not a 'public authority' as defined under the Freedom of Information Act and we will therefore not respond to requests for information made under this Act.

CVH does not retain information related to service users after 90 days from the last contact.

To request us to amend or update your information, please

- Email info@crimevictimshelpline.ie

or

- Write to Data Protection
Crime Victims Helpline
6/7 Hanover Street East
Dublin 2, Co Dublin
D02 W320

or

- phone: (01) 408 6116

Crime Victims Helpline aims to provide support to the highest possible standard at all times. To help achieve this, we encourage anyone who is not completely happy with the service they have received to let us know immediately, by contacting us (01) 408 6116.

All complaints will be investigated fully. It is important that you give as much information as possible to enable us to investigate your complaint. Your information will not be passed on to anyone outside of Crime Victims Helpline. With your prior consent, the Chief Executive will contact you directly to try to resolve your complaint.

It is our aim to resolve a complaint within 14 days of receiving it. In some cases, this isn't possible but we will do our best to resolve it as soon as we can.

If you have any questions or wish to add information concerning your complaint, please contact the Chief Executive +353 (0)1 408 6116 or email info@crimevictimshelpline.ie. Please be aware that if you call the Crime Victims Helpline administrative phone line, your telephone number will be visible and may be logged for administrative purposes.

Changes to this Privacy Statement

As the service we provide changes, we may need to alter this Privacy Statement. If you have any queries about this statement please write to:

- Data Protection
Crime Victims Helpline
6/7 Hanover Street East
Dublin 2, Co Dublin
D02 W320

or

- Email info@crimevictimshelpline.ie

or

- phone: (01) 408 6116