



Storfa Ddiogelu
Cymru
Wales Safeguarding
Repository

Privacy Notice

The Welsh Government has led a project to create a Single Unified Safeguarding Review ('**SUSR**') in Wales. The SUSR will provide a unified process for Safeguarding Boards when undertaking domestic homicide reviews, adult practice reviews, children practice reviews, mental health homicide reviews and offensive weapons homicide reviews.

Cardiff University has developed the Wales Safeguarding Repository ('**WSR**') and continues to be engaged in the ongoing development, delivery and hosting of the WSR together with Welsh Government.

All completed SUSR Reports will be retained in the WSR. Their findings will be used to inform learning on a pan-Wales basis through the creation of thematic reports. Permitted Users will be given access to the WSR in order to inform the safeguarding practice and learning of professionals such as police officers, social workers and those working in health and social care, and for academic research.

SUSR Reports will be prepared in a way which removes any personal identifiers and/or uses pseudonymisation to limit the possibility that individuals can be identified from a SUSR Report retained in the WSR. There is a possibility that, despite the use of such safeguards, individuals referred to in the SUSR Reports may still be re-identified by reasonably available means (e.g. internet searches) particularly where the incident which has triggered the review is well known or has been covered in the media. As such, the SUSR Reports are treated as if they contain the personal data of individuals.

The personal data of the reviewers who write the SUSR Reports and the personal data of individuals who access the WSR will also be processed.

Under UK data protection law Welsh Government will be the controller of the personal data processed by the WSR.

This privacy notice contains important information about the WSR, how and why your personal data is collected, stored, used and shared. It also explains your rights in relation to your personal data.

KEY TERMS

Permitted Users	Means individuals who have registered with the SUSR Co-ordination Hub, who have been provided with a username and password and agreed to the Terms of Use for the WSR.
SUSR Co-ordination Hub	Means the body providing a central co-ordination function for SUSRs, issuing usernames and passwords to access the WSR and arranging activities such as training and sharing of information and updates.

SUSR Reports	Means reports produced via the SUSR process in relation to Domestic Homicide Reviews, Adult Practice Reviews, Children Practice Reviews and Mental Health Homicide Reviews.
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THE WSR AND THE PROCESSING OF PERSONAL DATA

Personal data contained in SUSR Reports

SUSR Reports will include information about the incident that is the subject of the Review, together with geographical information, dates and other information individuals have given which relates to the incident or its background. This information together with other relevant information used by someone else (e.g. an internet search for information) could mean that individuals can be identified.

The SUSR Report will be provided to the SUSR Co-ordination Hub by the relevant Safeguarding Board. The Safeguarding Board will be responsible for the accuracy of the information included in the SUSR Report.

INDIVIDUALS WHOSE INFORMATION IS CONTAINED WITHIN THE SUSR REPORTS

How Welsh Government use your personal data and our lawful basis for processing your data

Under UK data protection law, Welsh Government can only use your personal data if Welsh Government have a lawful basis for doing so.

The processing involved in the operation of the WSR is as follows:

- The SUSR Report will be uploaded to the WSR along with some corresponding metadata (title, year of publication, year of incident, report type, collections that it would belong to etc.);
- The SUSR Report is annotated with key themes. This information is then added to the already provided metadata This is an automatic process that does not rely on user input.
- The SUSR Report is then stored on the file server and a reference to where the file is stored will be added to the metadata.
- Permitted Users will then be able to access the WSR via a web-based portal. Permitted Users will be able to use the search function of the WSR to search the data stored in the WSR database. The search function will reference the relevant SUSR Report and provide a file reference which can be used by the Permitted User to download the file, or upload the SUSR Report into the document viewer.

Welsh Government will rely on the fact that processing is necessary to perform a task in the public interest and the exercise of an official authority as its lawful basis for processing any personal data contained in the SUSR Reports. This lawful basis covers public functions and powers that are set out in law. Welsh Government will rely upon section 60 of the Government of Wales Act 2006, this allows Welsh Government to do anything which is considered appropriate to promote the social well-being of Wales. Taking responsibility for operating the WSR is considered to be promoting the social well-being of Wales.

Special category data

Special category data is personal data that needs more protection because it is sensitive and includes:

- personal data revealing **racial or ethnic origin**;
- personal data revealing **political opinions**;
- personal data revealing **religious or philosophical beliefs**;
- personal data revealing **trade union membership**;
- **genetic data**;
- **biometric data** (where used for identification purposes);
- data concerning **health**;
- data concerning a person's **sex life**; and
- data concerning a person's **sexual orientation**.

In order to lawfully process special category data you must identify a condition for processing that data as well as a lawful basis.

Welsh Government's condition for processing special category data contained in the SUSR Reports is that processing is necessary for reasons of substantial public interest, these interests being the Welsh Government's statutory obligation to the promotion of the social well-being of Wales.

Criminal offence data

In a similar way to special category data, personal data relating to criminal convictions and offences is also given extra protection. Criminal offence data covers a wide range of information including criminal activity, allegations, investigations and proceedings. It may also include information relating to unproven allegations, conditions or restrictions placed on an individual as part of the criminal justice process or civil measures which may lead to criminal penalty if not adhered to.

In order to lawfully process criminal offence data Welsh Government need to identify a condition for processing criminal offence data as well as a lawful basis.

Welsh Government's condition for processing criminal offence data contained in the SUSR Reports is that processing is necessary for reasons of substantial public interests, these interests being the Welsh Government's statutory obligation to promote of the social well-being of Wales.

Sharing personal data

The SUSR Reports will be provided to Cardiff University to be processed and uploaded to the WSR. Welsh Government has entered into a Data Processing Agreement with Cardiff University which requires Cardiff University to ensure the security of information uploaded to the WSR. Cardiff University are not permitted to use any personal data for their own purposes and that are only permitted to process personal data for the purposes specified in this privacy notice and in accordance with our instructions.

Permitted Users will be given access to the WSR. There may be occasions where, due to additional information that the Permitted User has or has access to, individuals may be identifiable from information contained in the SUSR Report.

Permitted Users are bound by the Terms of Use for the WSR which prevent them from:

- using material and data in the WSR for any purpose other than to improve safeguarding practice and learning of professionals such as police officers, social workers and those working in health and social care and/or academic research;
- Seeking to reverse engineer the identity of persons referred to in the WSR.

How long your personal information will be kept

SUSR Reports will be kept in the WSR indefinitely for the purposes of improving safeguarding practice and learning of professionals such as police officers, social workers and those working in health and social care and/or academic research.

Where your personal information is held

Your personal data will be held in the UK by Cardiff University. It will not be transferred by Cardiff University outside the UK and/or EEA.

Welsh Government have ensured that Cardiff University are under an obligation to ensure appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. Access to your personal information is limited to Permitted Users. Those processing your information will do so only in an authorised manner in accordance with the Terms of Use for the WSR and are subject to a duty of confidentiality.

There are procedures in place to deal with any suspected data security breach. Welsh Government will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

PERMITTED USERS

Personal data that will be collected

In order to provide you with a username and password to allow you to access the WSR and in order to monitor your use of the WSR the following personal data will be collected and processed by the SUSR Co-ordination Hub and the WSR:

- Name;
- Email address;
- Address of the organisation you work for;
- Usage Data (i.e. when the WSR is accessed, type of data accessed)

How Welsh Government use your personal data and our lawful basis for processing your data

Welsh Government will only use your personal data for the purpose for which Welsh Government collected it which are set out below:

- To register you as a Permitted User
- To manage your registration
- To track your use of the WSR in order to ensure that you comply with these Terms of Use
- To improve the WSR

Under UK data protection law, Welsh Government can only use your personal data if there is a lawful basis for doing so these are:

To register you as a Permitted User	Welsh Government will rely on the fact that processing is necessary to perform a task in the public interest and the exercise of an official authority. This lawful basis covers
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	public functions and powers that are set out in law. Welsh Government will rely upon section 60 of the Government of Wales Act 2006, this allows Welsh Government to do anything which is considered appropriate to promote the social well-being of Wales. Taking responsibility for an operating the WSR is considered to be promoting the social well-being of Wales.
To manage your registration	Welsh Government will rely on the fact that processing is necessary to perform a task in the public interest and the exercise of an official authority. This lawful basis covers public functions and powers that are set out in law. Welsh Government will rely upon section 60 of the Government of Wales Act 2006, this allows Welsh Government to do anything which is considered appropriate to promote the social well-being of Wales. Taking responsibility for an operating the WSR is considered to be promoting the social well-being of Wales.
To track your use of the WSR in order to ensure that you comply with these Terms of Use	Welsh Government will rely on the fact that we are performing a task in the public interest to ensure that the data contained in the WSR is used appropriately and that security of the data that is maintained.
To improve the WSR	Welsh Government will rely on the fact that we are performing a task in the public interest in seeking to improve the operation and functionality of the WSR.

Sharing your personal data

Welsh Government will not share your personal data with any third party save for Cardiff University as set out in the data sharing section of this Privacy Notice.

How long your personal data will be kept

Your personal data will be retained as long as you are registered as a Permitted User of the WSR.

Where your personal information is held

Your personal data will be held in the UK by Welsh Government. It will not be transferred by Welsh Government outside the UK and/or EEA.

Welsh Government have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Welsh Government also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

YOUR RIGHTS

Under data protection law, you have a number of different rights which you can exercise free of charge. These are described in the table below. Some of the rights only apply in certain circumstances and not all of the rights will be relevant in relation to our use of your personal data:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require any mistakes in your personal data to be corrected
To be forgotten	The right, in certain circumstances, to require that your personal data is deleted
Restriction of processing	The right, in certain circumstances, to require use of your personal data to be restricted (for example, if you contest the accuracy of the data)
Data portability	The right, in certain circumstances, to receive your personal data in a structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object to your personal data being processed for direct marketing (including profiling) and the right, in certain circumstances, to object to the continued processing of your personal data on the basis of legitimate interests
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of these rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of your rights, the easiest way for you to inform us that you wish to exercise any of your right is to email the following address: SUSRWales@gov.wales. You can also call or write to our Data Protection Officers (see below: '**How to contact us**'). **Please note that Welsh Government will ask you to:**

- Let us have enough information to identify you;
- Provide us with proof of your identity and address (e.g. a copy of your driving licence or passport); and

- Let us know what right you want to exercise and the information to which your request relates.

How to complain

We hope that our Data Protection Officers can resolve any query or concern you may raise about our use of your personal data.

The UK General Data Protection Regulation also gives you right to lodge a complaint with the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Changes to this privacy policy

This privacy notice was first published on 1 September 2024.

Welsh Government will make updated versions of our privacy notice available on the WSR website.

How to contact us

Please contact us/our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the personal data Welsh Government hold about you.

Our contact details are shown below:

Welsh Government Data Protection Officer:	Helen Morris
Our postal address	Cathays Park, Cardiff, CF10 3NQ
Our email address	dataprotectionofficer@gov.wales