

PRIVACY POLICY - POLICIES AND PROCEDURES

1. Introduction

- 1.1. This policy explains in clear language how Restitute collects, uses, shares, stores and protects personal information. It applies to Restitute's services and organisational activities, its main website and the Restitute Model Toolkit website.
- 1.2. Restitute is committed to protecting privacy and considering data protection when systems, services, products and working practices involving personal data are designed or changed.

2. Monitoring and Policy Review

- 2.1. Compliance with this policy will be monitored by the person appointed by Restitute with responsibility for data protection, with oversight from the Chief Executive and governing body.
- 2.2. This policy will be reviewed at least annually and updated sooner where services, systems, legal requirements or data-processing arrangements change.

3. Who This Policy Applies To

- 3.1. This policy applies to clients and service users, their families and carers, employees, workers, volunteers, trustees, applicants, donors, suppliers, professional contacts, training and consultancy participants, research and survey participants, website visitors, authorised Toolkit users and Delivery Site representatives.

4. Scope of this Policy

- 4.1. This policy covers personal data about a living individual that Restitute processes. Restitute processes personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other applicable UK data protection law.

5. Responsibilities

- 5.1. Restitute is the data controller for personal data for which it decides the purposes and means of processing. Restitute will make an appropriate privacy notice available before or when personal information is collected, unless an exemption applies.
 - All employees, workers and volunteers who handle personal data must follow this policy and Restitute's related information-governance and security procedures.
 - People will be told why information is required and the lawful basis for processing. Consent will be requested only where consent is the appropriate lawful basis.
 - Individuals may exercise their data protection rights, including objecting to relevant processing, as explained in section 18.

6. Restitute and its Services

- 6.1. Restitute supports third-party victims of crime and trauma: the parents, carers, partners, family members and loved ones of people who have survived significant violence, trauma, sexual abuse or exploitation. Restitute provides support in three main areas:
 - individual support from support workers;
 - practical support, including problem-solving, funding and the provision of goods and services; and
 - commissioned counselling delivered by appropriately qualified therapists.
- 6.2. Restitute also provides training, consultancy and advice; undertakes research, evaluation, surveys and service improvement; communicates with commissioners and professional partners; and carries out campaigning and public and professional awareness work.
- 6.3. The Restitute Model Toolkit explains the Model and provides controlled delivery material to authorised users and Delivery Sites. Some Model material is publicly available. Controlled Toolkit material requires an individual authorised account.

7. Personal Information

- 7.1. Personal information means information relating to an identified or identifiable living person. A person may be identifiable directly or indirectly by reference to a name, identification number, location data, online identifier or other aspect of their identity.
- 7.2. Restitute collects, uses, shares, transfers and stores personal information only where needed to provide services, meet legal and safeguarding responsibilities, administer the organisation, operate its websites and Toolkit, communicate effectively, and protect people and systems.

8. How We Use Personal Information

- 8.1. Restitute may process personal information for the following purposes:

- registering clients, allocating support workers and providing support and practical help;
- safeguarding, risk management, complaints, incidents and legal obligations;
- employee, worker, volunteer, trustee and applicant management;
- training, consultancy, events, bookings, commissioning, professional contacts and supplier management;
- donations, payments, payroll, pensions, accounts and financial administration;
- research, evaluation, surveys, feedback, reporting and service improvement;
- responding to website, email, telephone and other enquiries;
- creating and administering individual Toolkit accounts and authorisations;
- receiving Delivery Site readiness confirmations and function-assignment records submitted through the Toolkit; and
- operating, securing, maintaining and improving Restitute's websites, Toolkit and other systems.

8.2. Depending on the activity, information may include a person's name, date of birth, age, contact details, address, role, organisation, account username, communication preferences, service records, correspondence, financial information, technical information and records required for safeguarding, employment or service delivery.

9. Special Category and Criminal-Offence Information

- 9.1. Some information requires additional protection. This may include information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data used for identification, health, sex life or sexual orientation. Information about criminal allegations, proceedings or convictions is also specially protected.
- 9.2. Restitute will process such information only where it is necessary and where both a lawful basis and an applicable additional condition are identified. Depending on the circumstances, this may include explicit consent, employment and social-protection law, safeguarding and substantial public interest, vital interests, health or social care, research with appropriate safeguards, or the establishment, exercise or defence of legal claims.
- 9.3. Where information is shared, Restitute will share only what is necessary and will use consent where consent is required. Information may be shared without consent where Restitute is legally required or permitted to do so, including to protect a child or adult at risk or respond to an immediate risk of serious harm.

10. Lawful Bases for Processing

- 10.1. Restitute will identify and record an appropriate lawful basis before processing personal data. Depending on the purpose, this may be:
 - contract, where processing is necessary to enter into or perform an agreement;
 - legal obligation, where processing is required by law;
 - legitimate interests, where processing is necessary for Restitute's or another person's legitimate interests and those interests are not overridden by the individual's rights;
 - consent, where a person has made a freely given, specific, informed and unambiguous choice;
 - vital interests, where processing is necessary to protect someone's life; or
 - public task, where applicable to a particular commissioned or statutory function.
- 10.2. Where Restitute relies on legitimate interests, it will consider necessity, proportionality, reasonable expectations and the effect on the individual. Where it relies on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

11. Provision of Support and Safeguarding

- 11.1. When a person contacts or is referred to Restitute, Restitute may collect information needed to assess eligibility, make contact, provide and review support, make referrals, provide practical help, record outcomes and maintain safe and effective services.
- 11.2. This may include name, date of birth, contact details, communication needs, household and family information, relevant health information, disabilities and vulnerabilities, diversity information, emergency contacts, referral information, support records, correspondence, outcome information and relevant safeguarding information.
- 11.3. Access is limited to employees, workers, volunteers and authorised providers who need the information for their role. Restitute may share relevant information with contracted providers, commissioners, welfare services, health services, social care, safeguarding services, police, courts or other bodies where there is a lawful and necessary reason.
- 11.4. Restitute may contact current or former clients for feedback, research, surveys, service evaluation or information about relevant services where there is an appropriate lawful basis. Direct marketing will comply with data protection and electronic-communications law, and people can opt out at any time.

12. Employees, Workers, Volunteers and Applicants

- 12.1. Restitute processes information necessary to recruit, manage, support and pay its workforce and volunteers, meet health and safety and employment duties, and protect clients and the organisation. This may include:
 - identity and contact details, employment history, qualifications, training and professional memberships;

- right-to-work evidence, background and DBS checks, driving and licence information;
- contract, role, salary, payroll, pension, bank and tax information;
- attendance, leave, sickness, occupational-health and workplace-adjustment information;
- emergency contacts, next of kin and relevant family information;
- performance, supervision, disciplinary, grievance, complaint, conflict-of-interest and whistleblowing records; and
- access-control, information-security, health and safety and incident records.

13. Websites and the Restitute Model Toolkit

- 13.1. When a person visits Restitute's websites, technical information may be processed automatically. This may include IP address, browser and device information, date and time of access, pages requested, referring page, cookie information and security or error logs. This information is used to deliver and secure the websites, diagnose faults, prevent misuse and understand how public content is used.
- 13.2. Authorised Toolkit users are issued individual accounts. Restitute may process the user's name, work email address, organisation, role, username, authorisation status and account or security activity. Shared or generic Toolkit accounts must not be used.
- 13.3. The Toolkit includes Delivery Site readiness and function-assignment forms. These collect professional information such as name, role, work email address, organisation, declarations and the completed form entries. Submitting a form sends the completed record to Restitute and may send a copy to the submitter. Client or case information must not be entered into these forms.
- 13.4. Access to controlled Toolkit pages and downloads may be recorded by WordPress, the hosting provider or security services for access control, troubleshooting and protection of the site. Restitute does not use Toolkit account information to make solely automated decisions with legal or similarly significant effects.

14. Cookies and Similar Technologies

- 14.1. Restitute's websites may use strictly necessary cookies to provide core functions, maintain security, support login and remember essential choices. Non-essential analytics, preference or marketing cookies will be used only where permitted and, where required, after consent has been obtained through the website's cookie controls.
- 14.2. More information about the cookies in use, their purpose and duration should be provided through the cookie notice or settings available on the relevant website. A person can change non-essential cookie choices through those settings and can also control cookies through their browser.

15. Sharing Information and Service Providers

- 15.1. Restitute may use trusted organisations to provide hosting, WordPress and website services, email, communications, cloud storage, case-management systems, payments, accounting, payroll, pensions, professional advice, commissioned therapy, training, evaluation or other operational support.
- 15.2. Providers may process personal information only for agreed purposes, under appropriate contractual, confidentiality and security requirements. Restitute will share the minimum information necessary.
- 15.3. Where personal information is transferred outside the United Kingdom, Restitute will ensure that an appropriate legal safeguard is in place, such as UK adequacy regulations, the UK International Data Transfer Agreement or Addendum, or another lawful safeguard. Information about relevant safeguards can be requested from Restitute.

16. Retention

- 16.1. Restitute will keep personal information only for as long as it is needed for the purpose for which it was collected and to meet legal, safeguarding, contractual, insurance, audit and accountability requirements. Retention periods are set out in Restitute's retention arrangements and may vary by record type.
- 16.2. Client, safeguarding, complaint, incident, research, Toolkit, workforce and governance records will be reviewed and securely deleted, anonymised or archived when the applicable retention period ends. Anonymised information may be retained for statistics, research, evaluation and service improvement where individuals can no longer be identified.
- 16.3. Unsuccessful applicant information will normally be held for no longer than one year. Employee records will normally be held for six years after employment ends, subject to longer or shorter statutory periods for particular records. Financial records will normally be held for seven years.
- 16.4. Toolkit accounts will be disabled when authorisation ends or is no longer required. Account, security and submission records will be retained in accordance with the relevant operational, security, contractual and governance requirements.

17. Information Security and Personal Data Breaches

- 17.1. Restitute uses proportionate organisational and technical measures to protect personal information against accidental loss and unauthorised access, alteration, use, disclosure or destruction. Measures include role-based access, individual accounts, secure storage and transfer, staff training, supplier controls, monitoring and incident procedures.

- 17.2. Restitute investigates suspected information-security incidents and personal data breaches. Where required, it will notify the Information Commissioner's Office and affected individuals within the applicable legal timescales.

18. Your Rights

- 18.1. Depending on the circumstances, individuals have the following rights:
- to be informed about how personal information is used;
 - to request access to personal information;
 - to have inaccurate or incomplete information corrected;
 - to request erasure in certain circumstances;
 - to request restriction of processing in certain circumstances;
 - to receive and transfer certain information in a portable format;
 - to object to processing based on legitimate interests or public task, and to object to direct marketing at any time;
 - not to be subject to a decision based solely on automated processing where it produces legal or similarly significant effects; and
 - to withdraw consent at any time where processing relies on consent.
- 18.2. Some rights are subject to legal conditions or exemptions. Restitute will explain if a request cannot be fulfilled in full.

19. How to Contact Restitute About Your Information

- 19.1. To ask a question, exercise a right or raise a concern about personal information, contact Restitute:
- Email: support@restitute.org
 - Post: 31 Gipsy Lane, Frostenden, Beccles, Suffolk NR34 7HU
 - Telephone: 07946 557819
- 19.2. Restitute may request proportionate identification or other information to confirm identity and prevent information being disclosed to the wrong person. Restitute will normally respond within one calendar month. No fee will normally be charged, although the law permits a reasonable fee or refusal where a request is manifestly unfounded or excessive. Restitute will explain any extension, refusal or fee.

20. Complaints

- 20.1. Restitute would welcome the opportunity to resolve a concern directly. Individuals also have the right to complain to the Information Commissioner's Office (ICO):
- Website: <https://ico.org.uk/make-a-complaint/>
 - Telephone: 0303 123 1113
 - Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

21. Changes to this Policy

- 21.1. Restitute may update this policy when its services, websites, Toolkit, systems, providers or legal obligations change. The current version will be published on Restitute's main website and linked from the Restitute Model Toolkit.

Last Review Date: August 2026

Next Review Date: August 2027