CIRCLES UK PRIVACY NOTICE:
CORE MEMBERS

Circles UK is the overarching organisation overseeing the provision of Circles of Support and Accountability in England and Wales. Circles UK help to develop Circles and make sure they are run safely. We don’t run Circles ourselves, this is done by our Members. Your Circle Provider is a member of Circles UK.

When you are part of a Circle, Circles UK asks Your Circle Provider to share some of the information they collect about you with us. This Privacy Notice explains how Circles UK uses any personal information that is collected about you when you are part of a Circle.

Circles UK and Your Circle Provider are controllers in common of this data for the purposes of the General Data Protection Regulations. Where data is shared with Nottingham Trent University (NTU), Circles UK and NTU are joint data controllers.

What information does Circles UK collect about you?
Circles UK collects personal data about you from Your Circle Provider including:

- Date of Birth;
- Police National Computer (PNC) Number;
- Gender;
- Whether you are or have been married;
- Level of Education/Qualifications;
- When your Circle started and ended;
- Things about your life: whether you have a job, if you live alone or not, whether you receive benefits, whether you have any debt, whether you are in contact with your family.

and sensitive information (special category data) including:

- Sexual orientation;
- Religion;
- Whether you have any mental or physical health problems or disabilities;
- Information about your Criminal Offences (how old you were when you were first convicted, types of offences you have been convicted of and the type of sentence you were given);
- Your risk management (whether you have a Sexual Harm Prevention Order, what level of risk you pose);
- Information relating to any arrests/reconvictions/recalls/breaches during your Circle;
- Whether you have gone to a Sex Offender Treatment Programme, drug or alcohol treatment or psychiatric treatment;
- Questionnaires that you or your Circle Volunteers fill in about how you are feeling and things your Circle may have been helping you to work on, like sexual thinking, problem solving and relationships;
- A report about what happened in your Circle and whether the Circle helped you make any changes to your life (this is written by your Circle Coordinator).
Your name is not shared with Circles UK; we use a special Circle Code instead.

**How will Circles UK use your information?**

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Lawful basis for processing personal data</th>
<th>Lawful basis for processing special category and criminal offence data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Research to look at the type of people Circles work with, what problems they have and how Circles help them. This helps us to make Circles work better.</td>
<td>Legitimate Interests, to help us deliver our Charity’s aims. We have balanced these with your interests.</td>
<td>It is necessary for the purposes of scientific or statistical research.</td>
</tr>
<tr>
<td>Research to find out whether Circles help people not to offend. This helps us to show the people that pay for Circles whether Circles are a good thing to have.</td>
<td>Legitimate Interests, to help us deliver our Charity’s aims. We have balanced these with your interests.</td>
<td>It is necessary for the purposes of scientific or statistical research.</td>
</tr>
<tr>
<td>To fulfil Circles UK’s contract with the Ministry of Justice by reporting relevant information that may result in media attention or reputational damage, such as serious further offences.</td>
<td>It is in Circles UK’s legitimate interests to comply with its contract with the Ministry of Justice. It is also necessary for the Ministry of Justice to perform its public task.</td>
<td>It is necessary for the Ministry of Justice to perform its function, and for the administration of justice.</td>
</tr>
</tbody>
</table>

**Who will your information be shared with?**

Circles UK may share information with researchers, for example at Universities, or within government departments, who help Circles UK to do this research. This will include, but is not limited to, Nottingham Trent University, the Ministry of Justice and the Ministry of Justice Data Lab.

Before sharing your data with any external researcher (any researcher who does not work for Circles UK), Circles UK will ensure that the planned research meets ethical standards.

If Circles UK become aware that you have been arrested, charged or convicted of a serious offence while you are part of a Circle, Circles UK may be required to share this information with the Ministry of Justice as part of our contract with them.

**How will Circles UK keep your information safe?**

Your Circle Provider will only ever use your code number, not your name, when sharing your information with Circles UK. Circles UK won’t know who this code relates to.

Where possible, your information is recorded in categories, so it is harder to re-identify you.

When your information is shared with Circles UK, or with other researchers, it will be shared securely. Circles UK and any researchers will store the information securely. There will be legal agreements to make sure of this. Circles UK will not share more information than is needed for the research being done.
If we make research reports public, we will take out anything that might let people work out who you are.

**How long will we keep your information?**
Circles UK will keep a record of this information for 30 years after your Circle has ended, and then we will delete it. This sounds like a really long time but for us to collect enough information to show if Circles work we need to look at a lot of people over a long period.

External researchers will only keep your information for as long as they need it for their research. If research is published, this is usually between five and ten years.

**Transferring your information overseas**
We will not transfer your information outside the EU.

**Your Rights**
Data protection laws give you the right to:
- see a copy of information we hold about you;
- ask us to correct, remove or restrict the processing of information you think is inaccurate;
- object to us holding or using your data.

If you have already signed a form saying Circles UK could use your data, we won't rely on that consent to use your information. You can still act on the rights above. If you refused to sign the form before, we will assume that you have objected and we will not process your data further.

If you want to act on these rights then you should [contact Circles UK](#).

Circles UK will not be able to identify your information using your name, so if you want to act on your rights then we will need extra information from you. Your Circle Provider will be able to provide you with your Circle Code, or you may be able to provide Circles UK with other identifying information.

You may also need to prove your identity, so we can make sure that we are not giving your information to anyone else.

If you are not happy with the way we have used your data, you can also complain to the Information Commissioners Office.

**Changes to our Privacy Policy**
This privacy policy was last updated on 31st July 2018. We keep our Privacy Policy under regular review. We will place any updates on [www.circles-uk.org.uk](http://www.circles-uk.org.uk). If we make big changes to it while you are still in a Circle, we will give you a copy of it.

Contact Circles UK by:
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