

European Network for Work with Perpetrators' (WWP EN's)

Data and Confidentiality Policy for

The WWP EN Impact Toolkit (Data Collection Tool)

1. About the WWP EN Impact Toolkit

The WWP EN Impact Toolkit is an online database set up to collect information from questionnaires inputted by domestic violence perpetrator programmes or their clients at the programme's request.

2. Purpose of toolkit

- To provide programmes working with men who use intimate partner violence with a toolkit they can use and administer to analyse their impact on their clients and the partners/ex-partners and children of clients.
- To provide a structure for a report of outputs and outcomes for programmes to use.
- To provide a way of programmes across EU combining data for analysis by researchers in the WWP EN network in order to learn more about what helps to end intimate partner violence.

3. Purpose of policy

To outline roles and duties of participating programmes, WWP EN and any researchers working with the data.

4. Legal background

- European Convention on Human Rights, Article 8 – Right to Respect for Private and Family Life.
- European Charter of Fundamental Rights, Article 7 – Respect for Private and Family Life and Article 8 Protection of Personal Data.
- European Directive 95/46/EC 1995

The Data Protection Directive applies to countries of the European Economic Area (EEA), which includes all European Union (EU) countries and in addition, non-EU countries Iceland, Liechtenstein and Norway.

Personal data is any information taken and kept that identifies a person directly or indirectly, e.g. name, address, date of birth and other characteristics related to their identity. The person can also be called a “data subject”.

Any organisations that collect and manage personal data are called "data controllers".

“Processing” means anything that is done with the data, such as collecting, recording, storing, use of, disclosure of or adapting or altering it.

Data controllers must respect the privacy and data protection rights of those whose personal data they keep. They must:

- ✓ Collaborate with the data protection authority in their country;
- ✓ Collect and process personal data only when this is legal (for the purposes of this policy this means that the individual or data subject has been fully informed about this and has freely and unambiguously given their consent, as stated in Article 7);
- ✓ Respond to any complaints regarding breaches of data protection rules.

Further, the Directive sets out rules for data controllers:

- ✓ Personal data must be processed legally and fairly;
- ✓ It must be **collected for explicit and legitimate purposes** and used accordingly;
- ✓ It must be adequate, relevant and not excessive in relation to the purposes for which it is collected and/or further processed;
- ✓ It must be **accurate**, and updated where necessary;
- ✓ Data controllers must ensure that data subjects can rectify, remove or block incorrect data about themselves;
- ✓ Data that identifies individuals (personal data) must not be kept any longer than strictly necessary;
- ✓ **Further, data controllers must protect personal data** against accidental or unlawful destruction, loss, alteration and disclosure, particularly when processing involves data transmission over networks. They should implement the appropriate security measures and ensure a level of protection appropriate to the data.
- ✓ Personal data can only be transferred to countries outside the EU and the EEA when an adequate level of protection is guaranteed.

5. Programme responsibilities

5.1 Organisations that want to use WWP EN's online database or paper copies with reports done by WWP EN are asked to read, agree and sign up to this policy. There is a different policy for programmes using the paper copies but not getting reports from WWP EN.

5.2 Programmes using the toolkit should adhere to the European Directive and their own country's data protection legislation when processing any personal data. This includes their own detailed client records (including the records of client IDs generated to use the questionnaires).

5.3 Programmes agree to take into account (ex)partner safety throughout the data collection process. Programmes agree not to put (ex)partners at risk at any stage of this.

5.4 Programmes should have informed consent from their clients and (ex)partners to enter their data onto the online toolkit (whether it is inputted by the person themselves or a programme worker for them). Programmes agree to pay particular attention to making sure that all people give informed and written consent to giving their information. Refer to Appendix 3 for an example of a consent form.

5.5 Programmes will ensure that they use a code for their service user when entering it online, by using a unique client ID code/identifier. The format for this code should not contain any letters or numbers that could be used to identify a client, such as date of birth. Programmes will need to keep a record of the client ID number as they must use the same code each time the client inputs data, i.e. first contact, programme start, midway and end). As a minimum, for partners' and ex-partners' questionnaires, organisations are required to use the client ID, then use "P" for current partner, "X" for ex-partner and "2X" for a further ex, etc.. Programmes are welcome to use a code for the (ex)partner but this is not necessary if the required information is provided. If they only collect information from a partner and no information from the client then they should create a client ID for them.

5.6 Reports that identify specific organisations will be shared with that organisation first, and only released any further with agreement from that organisation.

5.7 Reports that do not identify individual organisations, such as country-based reports that include data from several organisations/ programmes, may be released into the public domain. By signing the policy, programmes are confirming that they are in agreement with this. Any concerns should be discussed with WWP EN staff before signing this agreement.

5.8 If a breach of the dataset occurs, once WWP EN has alerted the programme, potentially affected clients and (ex)partners should be told by the programme as soon as possible.

5.9 Any complaints from clients about the toolkit use should be dealt with through the programme's complaint policy and procedures.

6. WWP EN responsibilities

6.1 All data controllers (i.e. any WWP EN staff) and processors (i.e. researchers) will read, agree and sign to adhere to this policy.

6.2 Only WWP EN staff and researchers employed by WWP EN to create reports for organisations will have access to the database.

6.3 All data controllers (i.e. WWP EN staff) and processors (i.e. WWP EN staff and researchers) agree to follow European and their own country's data protection legislation and any relevant good practice guidelines when working on or storing the data. This includes the European Statistics Code of Practice (2011) and/or European Directive 95/46/EC 1995.

6.4 Confidentiality of the database is ensured through the hosting of the data in a secure web-based area. WWP EN will not share data with any other parties and take several steps to protect the data.

6.5 Anyone writing reports that identify specific organisations will share them with that organisation first and only release the information further with explicit agreement from that organisation.

6.6 Reports that do not identify individual organisations, such as country-based reports that include data from several organisations/programmes, may be released into the public domain.

6.7 If a breach of the dataset occurs, as soon as WWP EN is alerted to this, they will establish the extent of the concerns and to fix the issue as soon as possible. WWP EN will inform affected organisations as soon as possible.

6.8 Any complaints from programmes about WWP EN's handling of or responsibilities regarding use of the toolkit should be addressed in writing to the chair of the WWP EN (available from WWP EN's office in Berlin).



WWP | EUROPEAN NETWORK

Signature sheet

I agree to work to WWP EN's WWP EN Impact Toolkit Data and Confidentiality Policy.

Name _____

Signature _____

Role _____

Organisation _____

Country _____

Date _____



Appendix 1

The European Statistics Code of Practice 15 Principles:

1. Professional independence.
2. Mandate for data collection.
3. Adequacy of resources.
4. Commitment to quality.
5. Statistical confidentiality.
6. Impartiality and objectivity.
7. Sound methodology.
8. Appropriate statistical procedures.
9. Non-excessive burden on respondents.
10. Cost effectiveness.
11. Relevance.
12. Accuracy and reliability.
13. Timeliness and punctuality.
14. Coherence and comparability.
15. Accessibility and clarity.

Appendix 2

Potential risks of identification of individuals or organisations.

For individual clients and (ex)partners:-

If the dataset is breached then the following data will be available:

- Programme attended – which gives the country and possible areas they live in (i.e. within radius of reasonable travel time to programme)
- Age range of client
- Gender of client and (ex)partner
- Employment status and income.

It is highly unlikely that this could lead to the identification of specific individuals, particularly as programmes should use a code that does not identify an individual and should keep records of who attends the service(s) confidential. Exceptions to this might be when men are court-mandated or recommended to attend the programme, when information is available outside of the database and programme records, but this is also considered unlikely.

For organisations:-

These could be identified directly by breach of data which would reveal the ID code, or short name, for the programme. Also indirectly by information in a report that reveals identifying features. Programmes are asked to discuss any concerns prior to signing up to the toolkit.

Appendix 3

Example of Consent Form

Clients only

1. A code will be used for my data, and the same code will be used for all 4 questionnaires and my partner questionnaires. The programme will keep this code recorded on my file, which is kept confidential.

(Ex)partners only

2. The programme will use my (ex)partner's client ID number for me and the letter "P" if I am a current partner, "X" if I am an ex-partner. If no data is being collected from my (ex)partner a code will be used for my data, and the same code will be used for all 4 questionnaires. The programme will keep this code recorded on my file.

Both

3. The data is collected to evaluate the programme, information may also be used in country or European reports to help understand how to improve programmes.
4. The reports produced from the data will not identify me.
5. Only WWP EN staff and WWP EN employed researchers will see the codes and the website keeping the all the questionnaire data.
6. If anyone breaks into the dataset, I will be told as soon as possible. If I have worries about being identified, I can speak to the programme staff.
7. I have been told how I can complain to the programme about any problems I have with my data being used in ways that I have not agreed to.

I have had the points listed above explained to me, I understand and agree to them.

Name _____

Signature _____

Date _____

