

Privacy Notice

This privacy notice aims to give you information on how VKPP (College of Policing) will use your data from the NPCC Hydrant Programme's Complex Organised Child Abuse Database as part of the Safeguarding Partnerships Programme within Child Sexual Exploitation (CSE).

The purposes of the processing

The purpose of this is to assist in the evaluation of the under-reporting of Safeguarding Incident Notifications (SINs) within CSE. This privacy notice supplements other notices that may have been received and does not override them.

We will be able to identify where a Safeguarding Incident Notification (SIN) should have been considered by a Safeguarding Partnership.

The lawful basis for the processing

Personal data provided by the Complex Organised Child Abuse Database will be processed by VKPP (College of Policing) as a separate data controller. This will come under the lawful basis of public task and special category data under a separate condition, for reasons of substantial public interest, specifically for the purposes of equality of opportunity or treatment, as per Sch 1, Part 2, para 8 of the Data Protection Act (DPA) 2018.

The categories of personal data

The categories of personal data will include:

- Name.
- Date of birth.
- Date of incident.
- Offence.
- Crime reference number.
- Local Authority area.
- Police Force area.
- Safeguarding Partnership area.

The recipients of the personal data

Quality control measures will be applied in the Hydrant Programme prior to sending your data to the VKPP (College of Policing) to process to ensure that only relevant data is sent.

To enable this flow of data, a Single Point of Contact (SPOC) will be identified within the Hydrant Programme, VKPP (College of Policing), the National Panel and the DfE Secretariat. The Hydrant SPOC will identify the cases on the Complex Organised Child Abuse Database which meet the criteria for this exercise. The Hydrant SPOC will transfer this information to the VKPP SPOC at the College of Policing via email in a password protected document. The VKPP SPOC will receive the

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password for the document via a phone call with the Hydrant Programme SPOC. The VKPP SPOC will save the document on the College of Policing's network drive (Churchill) and will password protect it. Only the VKPP SPOC will have access to this.

This exercise will be undertaken once. Your information will not be shared with any third parties.

After the data analysis has taken place, the VKPP SPOC will keep your data in a separate folder and will store it on the College of Policing's Network Drive (Churchill). Access to data stored on Churchill will be password-protected. Only the VKPP SPOC will have access to this.

The retention periods for the personal data

The retention period for the personal information processed is three months. After this period your information will be securely disposed of.

As Data Controllers, the College of Policing takes data protection responsibilities very seriously. Your information will be held securely and will only be processed for the purposes stated above or to fulfil a statutory obligation.

Any identifiable information will not be shared with any other organisation and will not be used for any other purpose. Your name, or any identifiable information, will not be shared with any other organisation unless there is a statutory obligation to do so.

Any information held in an identifiable form will only be kept for as long as is necessary by the Hydrant Programme in accordance with their retention schedule.

Your rights in respect of the processing

You have certain rights under the GDPR regarding your personal data, which includes the right to access data held about yourself, to ensure it is accurate and to ask it is deleted or no longer processed.

For more information about your rights please see [our full privacy notice](#) on the VKPP website.

The right to lodge a complaint with a supervisory authority

You also have the right to lodge a complaint with the Information Commissioners Office (ICO) about the processing of your information if you are not happy about any aspect of the processing.

You can lodge a complaint with the ICO via their website or using [this link](#).

Contact details of our DPO

You can also contact the College Data Protection Officer by emailing:

Data.Protection@college.police.uk