

Privacy Statement – Period Dignity

What happens to information held about you? Your rights and our obligations to you.

How We Use Personal Data

This document explains how Bridgend County Borough Council (BCBC) obtains, holds, uses and discloses information about people (their personal data), the steps we take to ensure that it is protected, and also describes the rights individuals have in regard to their personal data handled by BCBC.

The use and disclosure of personal data is governed by Data Protection legislation. As such BCBC is obliged to ensure that it handles all personal data in accordance with the legislation.

BCBC takes that responsibility very seriously and takes great care to ensure that personal data is handled appropriately to secure and maintain individuals' trust and confidence in the Council.

The legislation requires BCBC to have a lawful basis for processing personal data depending on the service provided.

1. Why do we handle personal data?

BCBC's Period Dignity project (Bloody Normal) is funded using the Welsh Government Period Dignity in Schools and Communities Grant and as such comes with a series of eligibility checks to ensure that the support offered through the scheme is reaching the correct people.

We (BCBC) have partnered with an external company (Grace & Green by Eco Hygiene Care Ltd) to provide a subscription service of free menstrual products. In doing so, this offers the simplest, and safest, route from ordering through to delivery at your home.

To facilitate orders, Grace and Green will host a dedicated page on their website (<https://graceandgreen.co/>) whereby members of the public that wish to participate in the project will sign up and enter their details to their preferred subscription.

2. What type/classes of personal data do we handle?

Data will include:

- Your name
- Age
- Address
- School / Employment status

3. Who information is processed about?

Data is only shared on people who choose to participate in the project and subscribe to receive a delivery.

4. Where do we obtain personal data from?

Through the Grace and Green website, we will collect personal information that you provide to us when you:

- create an account on the website;
- place an order through the website;
- fill in forms on our website, for example to leave feedback or respond to a survey.

5. How do we handle personal data?

The Education and Family Support Directorate will handle personal data in accordance with data protection legislation. In particular we will ensure that personal data is handled fairly and lawfully with appropriate justification. We will strive to ensure that any personal data used by us or on our behalf is of the highest quality in terms of accuracy, relevance, adequacy and non-excessiveness, is kept as up to date as required, is protected appropriately, and is reviewed, retained and securely destroyed when no longer required.

6. How do we ensure the security of personal data?

BCBC takes the security of all personal data under its control very seriously.

BCBC will handle personal data in accordance with data protection laws. We will keep your information secure; it is only seen by staff on a 'need to know basis' who need it to do their jobs. Only authorised staff can use our computerised information systems and they must follow security procedures. In particular we will ensure that personal data is handled fairly and lawfully with appropriate justification. We will strive to ensure that any personal data used by us or on our behalf is of the highest quality in terms of accuracy, relevance, adequacy, is kept as up to date as required, is protected appropriately, is reviewed, and retained and securely.

We ensure that appropriate policy, training, technical and procedural measures are in place, including audit and integrity monitoring, to protect our electronic information systems from data loss and misuse, and only permit access to them when there is a legitimate reason to do so, and then under strict guidelines as to what use may be made of any personal data contained within them. These procedures are continuously managed and enhanced to ensure up-to-date security. Any information that we share with other agencies is sent securely and will only ever be shared with other agencies under careful controls, to ensure it is only used in the ways listed here.

7. Who do we disclose personal data to?

Data is only ever shared between Grace and Green and us (BCBC) for the purposes of eligibility checks and monitoring of uptake.

Grace and Green will share your information with their core service providers and third-party platforms as required for their business to function; for example, Royal Mail and DHL who assist us with fulfilling deliveries, and the third parties we engage to provide IT systems support.

We may also share anonymised information to Welsh Government who we are administering the scheme on behalf of.

8. What are your rights in relation to your personal data which is handled by BCBC?

Under the UK General Data Protection Regulation and Data Protection Act 2018, you have rights as an individual including:

- The right to Rectification – you have the right to ask to have your information corrected.
- The right to Restrict processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you.
- We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to Object – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to Erasure - you may request that we erase your personal data however, this may delay or prevent us delivering a service, or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to not be subject to Automated decision making and profiling.
- The right of Access – you have the right to ask us for copies of your personal data.

9. How long does BCBC retain personal data?

Data will only be retained for the lifetime of the project (up to 31st March 2024). After this point, data will be destroyed or anonymised for the purposes of reporting back to Welsh Government.

10. The lawful basis on which we use this information.

The UK General Data Protection Regulations (GDPR) requires specific conditions to be met to ensure that the processing of your personal data is lawful. These relevant conditions are below:

Article 6 (1)(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.

11. Contact Us

To make a request, please contact:

Access to Records

Bridgend County Borough Council

Civic Offices

Angel Street

Bridgend

CF31 4WB

Email: foi@bridgend.gov.uk

Complaints or Queries

BCBC endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer

Bridgend County Borough Council

Civic Offices

Angel Street

Bridgend

CF31 4WB

Email: foi@bridgend.gov.uk

Telephone: 01656 643565

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office — Wales

2nd Floor

Churchill House

Churchill Way

Cardiff

CF10 2HH

Telephone: 02920 678400 Fax: 02920 678399

Email: wales@ico.org.uk

Website: <https://ico.org.uk/>