

PRIVACY POLICY FOR REFERRALS

EDAN Lincs / Lincolnshire Domestic Abuse Support Service (LDASS)

Website: www.edanlincs.org.uk | www.ldass.org.uk

Version date: July 2026 | Next review: July 2027

IMPORTANT: PLEASE READ BEFORE COMPLETING A REFERRAL FORM

When you request a referral link, your email address is collected and stored. If you start filling in a referral form but do not press 'Submit', some of the information you have already entered may still be saved automatically in our case management system and may be visible to a small number of authorised EDAN staff.

We will NOT progress, contact you about, or act on any referral that has not been formally submitted. However, because of the way the system currently works, we cannot guarantee that any unsubmitted information will be immediately deleted.

Please avoid entering sensitive personal details, including information about children, safeguarding matters, or criminal offences, until you are ready to submit the form in full. We are actively working with our system provider to improve this.

For more details, please see Section 7 of this Privacy Policy ('Important information about incomplete referrals').

1. About this Privacy Policy for Referrals

EDAN Lincs operates as a domestic abuse service across Lincolnshire, including under the Lincolnshire Domestic Abuse Support Service (LDASS) brand. This Privacy Policy explains how we collect, use, share and protect personal data when you use our websites, make or request a referral, or otherwise engage with our services.

We take your privacy seriously. Because our service supports people in vulnerable circumstances, we are particularly mindful of the sensitivity of the information we handle and the importance of keeping it safe.

This policy should be read together with any additional privacy information provided at the point of collection, including on referral pages and in referral link emails. This policy was updated in July 2026 and replaces any earlier versions. Because the full text of any previous version could not be verified prior to this update, this document is issued as a clean replacement reflecting our current understanding of our data processing activities.

We are continuing to review our data governance arrangements, system settings, and retention practices in relation to our case management system (CMS), including ongoing discussions with third-party providers and commissioners. We may update this policy as those reviews progress.

2. Who Controls Your Data

EDAN Lincs (Charity Number: 1092913, a company limited by guarantee, registered in England and Wales) operates as a data controller in respect of the personal data it collects and processes through its websites and referral processes. Our registered address is: The BG Futures Business and Enterprise Centre, Bishop Grosseteste University, Longdales Road, Lincoln, LN1 3DY. Our postal address for correspondence is: PO Box 125, Lincoln, LN1 1HA.

Our referral process involves a case management system (CMS) built and provided by Make Time Count Today (MTCT), which has been commissioned by Lincolnshire County Council (LCC). **The precise legal relationship between EDAN Lincs, LCC and MTCT, including whether any of those parties is a joint controller or a processor for different elements of the processing, is a matter we are continuing to review against the relevant commissioning documentation, contractual agreements and data sharing arrangements. We will update this policy as that analysis is concluded.**

On the basis of the information currently available to us, EDAN Lincs considers that it is at least a controller, and potentially a joint controller, in respect of personal data entered into referral forms via its websites. We do not consider that EDAN Lincs acts solely as a processor in this context.

3. What Personal Data We Collect

3.1 Data collected through the referral process

When a referral is requested or made through our website (either as a self-referral by an individual or as a professional referral), we may collect and process the following categories of personal data:

Identifying and contact information

- Name of the person being referred
- Date of birth
- Email address (including the email address used to request the referral link)
- Contact telephone number
- Home address or location details

Safeguarding and household information

- Names, ages and dates of birth of any children in the household
- Details of other people in the household
- Information about the nature of risk or harm experienced

Referral details

- Reason for referral, including any free-text description provided by the referrer or the individual
- Service or support type requested
- Information provided by a professional referrer about their organisation and role

Information entered into free-text fields

Our referral forms include free-text narrative fields (for example, 'Reason for Referral' and confidential information sections in professional referrals). These fields expand and may contain extensive information. Referrers, whether professionals or members of the public, may choose to include information beyond what is specifically asked for. We ask referrers not to include unnecessary personal or sensitive information in these fields, particularly prior to formal submission.

3.2 Data collected through our website generally

Like most websites, our websites may also collect standard technical data such as IP addresses, browser type and pages visited, through cookies and similar technologies. Please refer to our Cookies Policy for further details.

4. Special Category and Children's Data

Because of the nature of our service, the personal data we handle is often of an especially sensitive character. This includes:

- Data relating to domestic abuse, which may include details of physical, emotional, sexual or coercive abuse, this is likely to constitute special category data within the meaning of UK GDPR (Article 9), in particular data concerning health.
- Information about children's names, ages and dates of birth. Children's data requires additional care and we take particular steps to ensure it is appropriately safeguarded.
- Information about safeguarding risks and vulnerabilities.
- Information relating to criminal offences or alleged criminal conduct is not specifically requested through our referral forms. However, referrers or members of the public may choose to include such information in free-text narrative fields. Where this occurs, we will handle it with the same level of care as other sensitive data and in accordance with applicable data protection law.

We are committed to ensuring that a clearly documented lawful basis and, where applicable, a clearly documented condition under Article 9 of UK GDPR, is identified and recorded for all

special category processing. This is an area we are continuing to document and formalise, particularly in connection with our CMS and referral process.

5. Why We Use Your Data and Our Lawful Basis

5.1 Submitted referrals

Where a referral form is completed and formally submitted, we use the information provided to:

- Assess and process the referral and determine whether we are able to offer support
- Contact the individual referred or the referrer to progress the referral
- Deliver domestic abuse support services
- Comply with our safeguarding obligations
- Record and report on service activity to our commissioners, as required
- Fulfil our obligations under our service contract with Lincolnshire County Council

For submitted referrals, our current understanding is that the principal lawful basis for processing is consent (where the individual has consented to the referral being made) and, where applicable, the performance of a task carried out in the public interest or in the exercise of official authority. Safeguarding obligations may also provide a lawful basis in appropriate circumstances. We recognise that the question of whether consent is the most appropriate or sufficient basis in all contexts, particularly given the potential vulnerability of individuals seeking support and the power dynamics involved and this is one we are keeping under review.

For special category data in formally submitted referrals, we rely (as applicable) on one or more of the following Article 9 conditions, subject to ongoing review and documentation:

- Explicit consent of the data subject
- Vital interests of the data subject or another person
- Substantial public interest (including safeguarding)

5.2 Incomplete and abandoned referrals

Please see Section 7 of this policy for important and detailed information about how data relating to incomplete or abandoned referrals is handled, including the current limitations of our case management system and the steps we are taking.

We acknowledge that the lawful basis for retaining personal data entered into referral forms that are started but not formally submitted is, at present, not clearly defined. This is a known compliance concern and we are actively working to address it. We do not use data from incomplete referrals to contact individuals or to progress any assessment or service delivery.

6. Sharing Your Data

We do not sell your personal data. We may share it only as described below:

6.1 Commissioners and statutory partners

EDAN Lincs is commissioned by Lincolnshire County Council (LCC) to deliver domestic abuse services across Lincolnshire. We may share data with LCC to the extent necessary to fulfil our contractual and statutory obligations and to report on service activity.

6.2 Case management system provider

Our referral forms and case management system are provided by Make Time Count Today (MTCT). As a result, personal data entered through the referral process passes through and is stored within MTCT's system. **The controller/processor relationship between EDAN Lincs and MTCT is under review. [We are seeking clarification from MTCT regarding data flows, hosting arrangements, sub-processors and retention]. We will update this policy when that review is complete.**

6.3 Other service providers

We may use other third-party service and technology providers who process data on our behalf, for example website hosting or email services. Where we do so, we will ensure appropriate contractual safeguards are in place.

6.4 Legal obligations and safeguarding

We may share personal data with statutory authorities (including the police, social services or other safeguarding bodies) where we are required by law to do so or where we believe disclosure is necessary to protect someone from serious harm.

7. Important Information About Incomplete Referrals

This section explains what happens when a referral is started but not submitted.

Please read this section carefully if you are completing or intending to complete a referral form through our website.

7.1 How our referral system works

To access a referral form on our website, you are first asked to provide an email address. Two emails are then sent to that address containing a direct link to the referral form (either a self-referral form or a professional referral form, depending on which you selected). The email address is collected and stored at this point.

7.2 What happens if a referral link is requested but the form is not started

If you request a referral link but do not enter any information into the form, your email address is still retained in our case management system. These entries appear in our system as 'Not Started' referrals. Only the email address associated with the link request is visible in this category.

7.3 What happens if the form is started but not submitted

If you begin filling in a referral form but do not formally submit it, any information you have entered may be automatically stored in our case management system. These entries appear in our system as 'In Progress' referrals.

Depending on how far through the form you have progressed at the time you leave or close it, the information retained may include:

- The email address to which the referral link was sent
- The name of the person being referred (if entered)
- The date of birth of the person being referred (if entered)
- Other personal information entered on the form, including information about children and any narrative text entered in free-text fields

This information is visible within the CMS to a limited group of authorised EDAN Lincs staff. At present, access is restricted to the Chief Executive, two senior managers and one administrator responsible for processing referrals. Staff must actively navigate to a referral entry to view the detail; it is not displayed automatically on a dashboard.

7.4 Incomplete referrals are not progressed

EDAN Lincs does not progress, act on, or contact individuals in connection with any referral that has not been formally submitted. The presence of data in our system relating to an incomplete referral does not mean that any action will be taken or that any service will be offered.

7.5 Retention and deletion of incomplete referral data

[We are currently unable to confirm a precise retention period for data relating to incomplete referrals. EDAN Lincs does not currently have the functionality to delete incomplete referral data from the CMS itself. Deletion capability is dependent in part on our CMS provider, MTCT. We are urgently seeking clarification from MTCT regarding the retention period applied to incomplete referrals and whether and how data can be deleted or purged.]

We are continuing to review system settings, retention arrangements and our wider governance framework in relation to the CMS in consultation with MTCT and LCC.

7.6 What you can do

To reduce the risk of sensitive information being retained unintentionally, we recommend the following:

- Please avoid entering sensitive personal details, particularly information about children, safeguarding matters, domestic abuse history, or any information relating to criminal matters, until you are ready to submit the form in one session.
- If you have concerns about information you may have entered into an incomplete referral, please contact us as soon as possible using the contact details in Section 12 of this policy.
- If you decide not to proceed with a referral after requesting a link, please let us know and we will endeavour to arrange deletion of any associated data to the extent we are able to do so.

We wish to be transparent that adding this notice to our website and to referral link emails is one mitigation step but it is not, in itself, a complete solution to the underlying technical and governance issues.

8. How Long We Keep Your Data

We will keep personal data only for as long as necessary for the purpose for which it was collected, or as required by law, whichever is the longer.

For formally submitted referrals and active service users, we apply a retention period consistent with our obligations as a domestic abuse service, our service contract requirements, and applicable legal and safeguarding guidance.

Specific retention periods: Service user records retained for 6 years from closure of case.

For data relating to incomplete or abandoned referrals, please see Section 7.5 above. We are working to establish and implement a defined retention period for this category of data as a matter of urgency.

When data is no longer required, we will delete or anonymise it securely and in accordance with applicable law.

9. Data Security

We take the security of your personal data seriously, particularly given the sensitive nature of the information we hold and the vulnerability of many of the people we support. We have implemented a range of measures to protect personal data against unauthorised access, accidental loss, alteration or disclosure, including:

- Restricting access to personal data to authorised staff only, on a need-to-know basis
- Role-based access controls within our case management system

- Restricting access to incomplete referral data to a small number of senior and authorised staff

We are in the process of obtaining further information from our CMS provider regarding hosting arrangements, multi-factor authentication, sub-processors, audit logs and other technical security measures. We will update this section once those details have been confirmed.

In the event of a personal data breach that is likely to result in a risk to individuals, we will notify the Information Commissioner's Office (ICO) in accordance with our legal obligations and, where required, will notify affected individuals.

10. Your Rights

Under UK data protection law, you have the following rights in relation to your personal data:

Right	What this means
Access	You can ask us for a copy of the personal data we hold about you.
Rectification	You can ask us to correct inaccurate or incomplete personal data we hold about you.
Erasure	In certain circumstances, you can ask us to delete your personal data. This right is not absolute and may be limited by our legal obligations.
Restriction	You can ask us to restrict our processing of your personal data in certain circumstances (for example, while an inaccuracy is being verified).
Objection	You may have the right to object to certain types of processing, for example processing based on public interest.
Portability	Where processing is based on consent or a contract and is carried out by automated means, you may have the right to receive your data in a portable format.
Withdraw consent	Where processing is based on consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing carried out before the withdrawal.

To exercise any of these rights, please contact us using the details in Section 12 below. We will respond within one month of receiving your request, although we may extend this period by a further two months in complex cases, in which case we will let you know.

We may need to verify your identity before we can process your request. We will not charge a fee for a reasonable request but may charge a reasonable fee or decline to respond where requests are manifestly unfounded or excessive.

11. Complaints

Important: Under the Data (Use and Access) Act 2025, which came into force on 19 June 2026, you must first raise any complaint about how we handle your personal data directly with EDAN Lincs before escalating to the Information Commissioner's Office (ICO). Please follow the process below.

Step 1: Complain to EDAN Lincs first

If you have a concern or complaint about the way we handle your personal data, please contact us in the first instance using the contact details set out in Section 12 of this policy. Please describe your concern clearly and include as much relevant information as possible. We will acknowledge your complaint promptly and aim to provide a substantive response within 30 days, or within a reasonable period where the matter is more complex.

Step 2: Escalate to the ICO

If you remain dissatisfied after raising your complaint with us, or if we have not responded within a reasonable time, you have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Helpline: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You also have the right to seek a judicial remedy against us or against the ICO through the courts.

12. How to Contact Us

If you have any questions about this Privacy Policy, wish to exercise your data protection rights, or have a concern or complaint, please contact us:

Organisation: EDAN Lincs Domestic Abuse Service

Postal address: PO Box 125, Lincoln, LN1 1HA

Telephone: 01522 510041

Email: info@edanlincs.org.uk

Data Protection Officer / Privacy Lead: **Celia Madden, CEO**

ICO Registration number: **Z7921978**

This Privacy Policy was last updated in July 2026.

EDAN Lincs is a company limited by guarantee. Charity Number: 1092913.

Registered in England and Wales. Registered address: The BG Futures Business & Enterprise Centre, Bishop Grosseteste University, Longdales Road, Lincoln, LN1 3DY.