

Privacy Notice

IAC is committed to ensuring that any person whose personal data we hold is respected, protected and held securely, whether gathered through our website at the early enquiry stage, or later in the adoption process for the purpose of an adoption application.

This privacy notice provides details about what information we collect and why; how we use the information; the conditions under which we disclose it and to whom and how we keep it secure. In addition it gives information about how you can request that the information we hold about you is deleted from our systems.

What is personal data?

Personal data is any information that we hold from you which means that you could be directly or indirectly identified. This would include your name, your email address, contact details etc.

Certain data falls under 'special categories'. This includes your racial and ethnic origin, your political beliefs, your religious beliefs and genetic/biometric data.

Processing your personal data

The processing of your sensitive or 'special category' personal data, such as information about your ethnicity or health information, is lawful in accordance with section 10(3) of and Schedule 1 to the Data Protection Act 2018 and Article 9(2)(g) of the GDPR. This processing is necessary for reasons of substantial public interest and is in exercise of a function conferred on IAC – The Centre for Adoption by the Department for Education as regards processing intercountry adoption applications. This is to ensure that intercountry adoptions are processed in compliance with the legislative framework with satisfactory child safeguarding procedures and that an intercountry adoption is in a child's best interest.

IAC Website

When you make contact with IAC, through the Contact Us page on the website we will ask you for your:

- Name
- Contact details including telephone number
- Brief details of your enquiry

This is to ensure that your query can be responded to by the most appropriate IAC professional.

IAC's website relies on the use of Cookies, information about which is set out on IAC's website in a separate Cookies Policy.

The Intercountry Regional Adoption Agency working in partnership with



Advice Line and Information Sessions

When you make contact with the Advice Line, our Advisors will ask you for further details which will be recorded on IAC's Case Record Management System, CHARMS (provider Social Care Network Solutions further information www.socialcarenetwork.com). These will include basic details such as your home address and your age. We will also ask you for both personal and 'special category' information (your race, religion, sexual orientation and health history). This is to ensure that the Advice Line has enough detail to provide you with correct information about the countries from which you might be eligible to adopt and the options available to you. If you do progress to attend an IAC Information Session, some of your personal information will be made available to IAC's facilitators who run those Sessions; again this is in order to ensure that IAC can offer you the most appropriate advice taking account of your personal situation.

Information Session records are held on CHARMS and in hard copy in a locked filing cabinet for one year before deletion; Advice Line records are held for two years. At IAC we do find that potential intercountry adopters may take time to decide if or how they wish to progress their adoption journey and retaining records for these periods allows for enquirers to return to the Agency for further advice without the need to repeat key information.

IAC Assessment Service

When you request an Initial Interview Form and attend an Initial Interview you will be asked to provide further information about your health, background, employment, finance, family composition and reasons for wishing to adopt. This information is entered onto CHARMS, the IAC's CRM and any hard copies stored in locked filing cabinets. These can be accessed by relevant managers, the administrators and social work team providing the service. Again, this enables the professional team to offer bespoke advice to you and to ascertain your eligibility to adopt and from which country overseas.

Once you have decided that you wish to apply to adopt and complete a Registration of Interest Form you will be asked for further personal information. This information is requested in accordance with The Adoption and Children Act 2000, the Adoption Agencies Regulations 2005 and the Adoption with a Foreign Element Regulations 2005 and enables the Agency to undertake all the statutory checks required in relation to an adoption application and to undertake an assessment of suitability. These records are held on CHARMS and in hard copy in locked secure bunkers and are accessed by relevant managers, the administrators and social work team providing the service to you.

Initial Interview enquiries and records are held for five years on CHARMS and in locked bunkers. Adoption Records (Adoption application data and that associated with the assessment process) are held for ten years, where no child is placed. **If a child is placed for adoption the records are held for 100 years.**

Sharing the information

We do not share information collected from the web site or from the Advice Line/Information Sessions with any other individuals unless you request that we do so, in order, for example, to assist you in furthering your adoption enquiry. E.g. talking with your Local Authority on your behalf. We do not rent or trade email lists with any other organisation.

In order for IAC to progress your application and assist you with your plans to adopt, it is necessary for IAC to share some of your data with other organisations or individuals. This would include:

- The Local Authority where you currently live (or where you have lived in the past) for statutory checks;
- Other Voluntary Adoption Agencies;
- Your General Practitioner and Health service providers;
- Your place of work;
- The people you nominate to be provide personal references and who might be your nominated testamentary guardian;
- Your notary public;
- The Department for Education (or in some circumstances other UK adoption central authorities eg. Scottish government) in order for you to receive your Certificate of Eligibility
- A named overseas agency, if you are adopting through an IAC special programme.

Generally IAC's prospective adopters are applying to countries outside the EEA which are not recognised as having equivalent data protection provisions to those required under GDPR.

When applying to adopt a child from a country or territory outside of the EEA, the process of making an intercountry adoption application requires that personal data in relation to your application is then transferred outside the European Economic Area (EEA) in order to complete your adoption process. The data sharing is lawful under Article 49(1)(d) of the GDPR as applied by the Data Protection Act 2018; the transfer is necessary for important reasons of public interest. This is because it is necessary to ensure that an intercountry adoption application is processed in compliance with the legislative framework with satisfactory child safeguarding procedures and that an intercountry adoption is in a child's best interest.

Mailing lists

IAC holds two mailing lists

- Waiting and existing adopters – this allows the Agency to contact you with details of forthcoming adoption support and adoption social events e.g. the Family Day, Workshops and to ensure that you are kept in touch with Agency activities through Meridian, the bi annual newsletter.
- Fundraising list for events.

IAC considers it to be its duty to intercountry adopters and to the children you will or have adopted to ensure you are aware of the adoption support services that are available to you as an IAC intercountry adopter.

For other communications you can unsubscribe at any time by contacting: info@icacentre.org.uk

How do we protect your information?

IAC uses a safe and secure private cloud-based recording system hosted in the UK to record and store data. Called CHARMS, it is also used by many local authorities and other VAA's in the UK to handle their adoption data. It can only be accessed by authorised users whose rights of access are set according to their need in relation to their role and their seniority in IAC. Some other records are held on a protected internal drive which can only be accessed by authorised users. In intercountry adoption hard copies of specified documents are usually required by the overseas countries and such documents are stored by IAC in fire proof, locked iron safes.

Information is transferred externally through:

- Encryption
- Password protection
- Secure sites managed by the overseas countries and,
- Where hard copy documents are required, through courier services.

Policies and Procedures

IAC has both Data Protection Policies and Policies in relation to the retention of service users' records.

Access to Personal Information

Under GDPR you have the right to access and amend any of your personal data. This does not include data that IAC has obtained during the course of obtaining statutory checks/references or any other information provided by a "third party". You can also request for your data to be deleted up until the point at which a Registration of Interest has been made. Please contact info@icacentre.org.uk

Privacy Notice review

This policy will be reviewed at least annually.

We hope that this information is clear and helpful to you. As an adoption agency, confidentiality and the protection of privacy are key tenets of the work we undertake, so we do understand your wish for and need for privacy in relation to the highly sensitive data you share with us as part of your adoption journey.

Last reviewed: December 2018