

# Oxfam GB 'SPEAK UP' Privacy Notice

## THE PURPOSE OF THIS PRIVACY POLICY

When you use the 'Speak Up' helpline or web portal you are contacting a service which is provided for Oxfam GB by an independent organisation (Navex), who will respect your privacy in how they work with your information. In law, Oxfam GB is ultimately responsible for how your information is used (in law the 'Data Controller'). However, your information will only be gathered in a way which is linked to you - and consequently made available to Oxfam - with your consent.

If you choose, you can report a concern through the 'Speak Up' process anonymously. Whether anonymous or not, the concern you raise and the information you are willing to share will be passed on to specialist teams within Oxfam GB for investigation, action and resolution. The information you submit will be treated confidentially and where the law or the investigation requires information to be shared, this will be done sensitively.

This privacy notice explains what personal information we in Oxfam GB collect, why and how we collect it, and what we do with it during the 'Speak Up' process

## WHAT TYPE OF PERSONAL INFORMATION IS COLLECTED AND PROCESSED?

The personal information we collect depends on the concern raised and the steps needed to investigate, action and resolve the concern. It may include:

- **Your name and contact details**, as the person who raises the concern.
- **Your relationship to Oxfam** and associated information, for instance, details of job role and manager, the program participated in, how you were campaigning, volunteering, or supporting us.
- The name and contact **details of individuals involved**, such as the subject of your concern, or witnesses, and their relationship to Oxfam.
- **The context of concern being raised**, depending upon the nature of the allegation or concern, this could include a description of behaviour, activities in relation to Oxfam, location and time of incident, or other data which is relevant to the allegation or concern

This may include '**special category**' data if it is relevant, such as *race, ethnic origin, trade union membership, philosophy, or religion* (for instance, if related to an incident motivated by or related to one of these aspects), *sexual life or orientation* (for instance, if related to sexual abuse or safeguarding), *health or financial information* relating to individuals.

Given the variety of concerns that can be raised through the 'Speak Up' process this list is not exhaustive.

## WHY IS THIS PERSONAL DATA BEING PROCESSED?

We process **your name and contact details** in order that we can:

- Gather further information regarding your concern
- Update you regarding the way in which we are dealing with it
- Make referrals if appropriate to other services or organisations

You do not need to share your name or details with Oxfam GB, you can raise a concern anonymously (except for countries where anonymous reporting is prohibited by law). It may improve our investigation if we can collect additional information from you. In some situations, the actions we can take are limited if the concern is raised anonymously. If you provide your details we will be able to feedback to you, as far as we are able, the actions taken to resolve your concern.

We process the **other information regarding your concern**, which could include **special category data** to:

- Understand what we may need to investigate or follow up on
- Take appropriate action where necessary to address your concern
- Identify misconduct, illegal acts, or protect those with whom we work.

## HOW WILL THE INFORMATION BE USED?

We use this information for one of the following reasons in law:

- We will ask for your **consent in law** to process the details you provide, which are linked to you – your ‘personal data’. This may include **special category data**.
- We believe that we have a **legitimate interest** to prevent and detect fraud or misuse of our systems, protect those with whom we work, or need to detect or prevent unlawful acts or dishonesty;
- Where the data which we are working with is **special category data**, that there is a **substantial public interest** to detect and prevent unlawful acts or dishonesty.

This personal information will not be used for unsolicited newsletters or direct marketing.

## HOW IS THE DATA BEING COLLECTED?

This data will be collected using the following methods:

- Via online forms, or via the telephone hotline.
- Via follow-up using phone, email or other mechanisms, from the specialist teams in Oxfam such as counter-fraud, HR, legal and safeguarding.

## SECURITY OF YOUR PERSONAL DATA

All the information you give us will be stored securely in Oxfam GB offices and IT systems and our contracted suppliers’ IT systems. This includes in cloud-based systems administered by IT providers and which are designed for processing data including special category data. Navex provide the EthicsPoint system which we use for capturing and managing your concerns.

## WILL OXFAM SHARE MY INFORMATION WITH ANYONE ELSE?

Your data will be shared with teams within Oxfam GB responsible for investigations, for example counter-fraud, HR, legal and safeguarding.

Your data will only be shared outside of the Oxfam confederation in an anonymous way unless required by law (e.g. with regulators, public authorities, or law enforcement) or to prevent or detect crime or dishonesty.

With your consent data may be shared with therapeutic services or other agency to provide support to you.

In some cases, Oxfam GB may transfer your personal data, including special categories of personal data, to Oxfam Affiliates when the investigation involves Oxfam staff who are managed outside Oxfam GB. The same data protection regulation applies to European Oxfam affiliates. Where Oxfam affiliates or suppliers are outside the EEA, the transfer of data will occur under the protections of the European Commission's standard contractual clauses. You may ask to see a copy of these clauses.

## **HOW LONG DOES OXFAM GB RETAIN MY PERSONAL INFORMATION FOR?**

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations.

Our [retention schedule](#) provides more detail on how long we retain different types of information.

## **HOW CAN I SEE WHAT INFORMATION YOU HAVE ABOUT ME?**

If you have any further questions or comments concerning your privacy, if you wish to access your personal data held about you, delete, or update information we hold about you, please contact Oxfam's Data Protection Officer at:

Data Protection Officer  
Oxfam  
Oxfam House  
Oxford  
OX4 2JY

[Privacy@oxfam.org.uk](mailto:Privacy@oxfam.org.uk)

## **WHAT RIGHTS DO I HAVE?**

You also have certain rights to see, update, restrict, object to the use of, or (where relevant) withdraw your consent to the use of your data at any time and at no cost. If you wish to exercise any of these rights, please contact the whistleblowing hotline or Oxfam's Data Protection Officer.

You have the right to lodge a complaint in relation to the processing of your data with the Information Commissioner's Office, the public body responsible for information rights in the UK. More information can be found on their website at <https://ico.org.uk>, or you can write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF