



1. Introduction

- 1.1 The Single Unified Safeguarding Review (“**SUSR**”) process is designed for use where a safeguarding review (i.e. an adult practice review, child practice review, domestic homicide review, mental health homicide review or an offensive weapons homicide review) is required.
- 1.2 A SUSR will be undertaken by the relevant statutory Safeguarding Board. A Safeguarding Board is made up of relevant partners which include the local authority, police, local health board, NHS Trust and probation service (the “**Review Partners**”).
- 1.3 The Review Partners will provide information about the circumstances which have led to the SUSR being undertaken to the reviewer appointed to undertake the review. There may also be other third parties who will have relevant information to contribute to a review, such as independent professionals, charities and advocates.
- 1.4 In the course of a SUSR personal information relating to a number of individuals who are connected with the circumstances which have led to a SUSR being undertaken will be processed. This document (“**privacy notice**”) sets out information relating to how personal information will be used during a SUSR and what rights individuals have in relation to their personal information and various other matters required under data protection law.
- 1.5 **Cyngor Gwynedd** has been designated the lead authority in relation to this SUSR and will be responsible for ensuring compliance with relevant data protection obligations and will be the point of contact for any individuals seeking to exercise their rights in respect of their personal information in relation to this SUSR.
- 1.6 Further information regarding the SUSR process is available in the following Statutory Guidance at www.gov.wales/single-unified-safeguarding-review-statutory-guidance
- 1.7 In the sections below when referring to individuals the terms “you” or “your” are used. When referring to the Safeguarding Board and/or the lead authority the terms “we” or “us” are used.

2. Our approach to privacy

- 2.1 We take your privacy extremely seriously and want you to feel confident that your personal information is safe in our hands.
- 2.2 We will only use your personal information in accordance with data protection law applicable to England and Wales from time to time.

2.3 Under data protection law, when we use your personal information, we will be acting as a data controller. Essentially, this means that we will be making decisions about how we want to use your personal information and why.

3. What personal information will be used

3.1 A SUSR will involve the processing of personal data in relation to the Subject of the Review, any perpetrator(s) or alleged perpetrator(s) and any person(s) with a connection to the Subject of the Review or the circumstances which have resulted in a SUSR being undertaken (“Principal Individuals”).

3.2 The personal information being processed will depend upon the individual in question and their involvement with the circumstances that have led to the review. The personal data processed will include any or all of the following name, age, date of birth, gender, address, family details, financial data, safeguarding information, education history, housing information, passport number, lifestyle information, nationality, immigration status, employment history and any other information provided during the course of the SUSR from family members, friends, local community, social networks, social media and faith leaders or representatives.

3.3 A SUSR will also involve the processing of the following special category data where relevant; ethnicity, medical history, mental health information, sexual orientation and religion, and information regarding an individual’s criminal record and information on anti-social and criminal behaviour.

4. How will personal information be used

In the process of the review and preparation of the SUSR Report

4.1 An initial referral is made to the relevant Safeguarding Body which will include the name of the subject of the review, alleged perpetrator(s), supporting evidence to justify a SUSR including information on the circumstances of the review. The Safeguarding Board will process this data to determine whether the case meets the criteria for a SUSR.

4.2 A reviewer(s) will be appointed to work with the Safeguarding Board’s Review Panel to undertake the SUSR. The information provided to the reviewer(s) and the Review Panel during the course of the SUSR will include personal information and may include special category data and/or data relating to criminal convictions/offences of the type set out in 3 above. The personal information will be provided to the reviewer by Review Partners, perpetrator(s), the subject of the review, the family of the subject, Principal Individuals, independent professionals, charities and advocates and any other relevant bodies.

4.3 The reviewer will produce a draft SUSR Report (the “Report”) and an outline Action Plan. The Report will cover background information and information regarding the circumstances necessitating the SUSR, geographical information, connection to the perpetrator(s), information regarding criminal convictions, a summary timeline of significant events, details of protected characteristics, other relevant information provided during the course of the SUSR, contact with local agencies, practice and organisational learning, recommended actions and potential improvements.

Removal of personal identifiers from the Report

4.4 The draft Report and Action Plan will be prepared in a way which removes any personal identifiers and/or is pseudonymised to reduce the potential of individuals being identified. There is still a possibility however that, despite the use of such safeguards, individuals referred to in the Report may be identified by reasonably available means, particularly

where the incident which has triggered the SUSR is well known or has been covered in the media. The draft Report and final Report are therefore treated as containing personal data.

4.5 The draft Report is presented to the subject of the review and/or their family and principal individuals enabling them to choose a suitable pseudonym to be used. Gender anonymisation will also be discussed.

Approval of the Report

4.6 The draft Report will be provided to the Safeguarding Board for approval. Safeguarding Board will be responsible for the accuracy of any personal data included in the SUSR Report.

4.7 In the case of a domestic homicide the Report will be submitted for approval by the Home Office Assurance Panel.

4.8 In the case of an offensive weapons homicide, the Report will be submitted to the Secretary of State for the Home Office.

Publication of the Report

4.9 Once approved the Report will be:

- (a) Submitted to the Co-ordination Hub to be retained in the Wales Safeguarding Repository (“**WSR**”). AI Tools are used within the WSR for the purposes of information search and retrieval processes operating on the reports held within the WSR. Data held within the WSR may also be used for the purposes of training and improving these AI Tools. The AI Tools are based on open-source language models; these models are hosted internally as component parts of the WSR. No WSR data is transferred to external or cloud-based AI services.
- (b) Published by the Safeguarding Board’s website in accordance with the Safeguarding Board’s statutory obligations and the Statutory Guidance [www.gov.wales/single-unified-safeguarding-review-statutory-guidance].
- (c) In the case of a domestic homicide published in the Home Office’s domestic homicide review library.

Notification to Welsh Government

4.10 SUSR notifications will be made to Welsh Government (via the Co-Ordination Hub).

Retention in the Wales Safeguarding Repository

4.11 All Reports will be retained in the WSR. The Report’s findings will be used to inform learning on a pan-Wales basis through the creation of thematic reports. Permitted users (i.e. individuals who have registered to be permitted access to the WSR) will be able to search the WSR in order to inform the safeguarding practice and learning of professionals such as police officers, social workers and those working in health and social care, and for academic research.

4.12 There is specific privacy information in relation to how personal data is processed in the WSR which is available [here](#).

5. Our lawful basis for processing personal information

5.1 The lawful bases that we rely upon to process personal information is:

- (a) That processing is necessary to comply with a legal obligation;
- (b) that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller); or
- (c) that processing is necessary for our legitimate purposes, or those of a third party, and those interests are not overridden by those of the individual whose personal data is being processed. Our legitimate interests in this regard are to undertake a review of the circumstances that have led to a review and to inform learning.

5.2 Where special category data or criminal offence data is processed in the context of an SUSR we will rely upon the following conditions for processing that information:

- (a) That processing is necessary for reasons of substantial public interests in accordance with function conferred by law; and
- (b) That processing is necessary for archiving purposes in the public interest or historical research purposes. The specific safeguards that have been utilised are the pseudonymisation of Reports and the restriction of access to the WSR to those who have registered to use it and signed Terms of Use which prohibit re-identification.

6. Retention

6.1 Reports will be published on the Safeguarding Board's website for a period of 12 weeks. They will then be retained by Cyngor Gwynedd and accessible on request for a period of five years.

6.2 Reports will be retained in the WSR indefinitely in order to build a repository of information that can be accessed for research and training purposes. As outlined above, Reports will have been pseudonymised in order to safeguard individuals from being identified and only individuals who have registered and signed Terms of Use which prohibit re-identification will have access to the WSR.

6.3 Notifications to Welsh Government will be deleted at the earliest opportunity following the publication of the SUSR Report and at the latest after 2 years.

7. Sharing personal information in relation to a SUSR

7.1 Personal information will be shared by Review Partners and others with the reviewer in the context of a SUSR. The sharing of information will be done via a data sharing agreement which will require all Review Partners and others to ensure that they are complying with data protection legislation when sharing personal information.

7.2 SUSR notifications will be shared with Welsh Government. In the case of an offensive weapons homicide a notification will be made to the Home Office.

7.3 Reports will be published by the Safeguarding Board on their website, provided to Welsh Government via the Co-ordination Hub and retained in the WSR. In the case of a domestic homicide approved and published in the Home Office's domestic homicide review library. In the case of an offensive weapon homicide the Report will be submitted to the Home Office [\[Privacy Information Notice - Piloting of offensive weapons homicide reviews - GOV.UK \(www.gov.uk\)\]](https://www.gov.uk/government/publications/privacy-information-notice-piloting-of-offensive-weapons-homicide-reviews).

7.4 The WSR can be accessed by permitted users.

7.5 The Co-ordination Hub will also review completed Reports to disseminate common learning, themes, issues in service provision and areas of good practice at set intervals.

8. Transfer of personal information outside the EEA

8.1 We do not intend to transfer your personal information outside the EEA. However in regard to your personal data stored in the WSR please see the specific privacy information which is available [here](#).

9. How do we keep your personal information secure?

9.1 We take various steps to protect your personal information while it is in our possession, including:

- (a) Implementation of appropriate security measures to protect our IT infrastructure;
- (b) Encryption of personal information at rest and in transit;
- (c) Pseudonymisation of personal information;
- (d) Control measures and policy review and the Council's cyber security procedures;
- (e) Cyber security provision which includes defence and formal access control measures
- (f) Permanent resource for monitoring and responding to security alerts and incidents
- (g) Implementation of policies to ensure appropriate actions by staff
- (h) Assessments of third party security standards

9.2 The notification and report provided to Welsh Government will be stored on iShare and accessed by authorised and security cleared staff only.

10. What rights do you have under data protection law?

10.1 Under data protection law, individuals have a number of different rights relating to the use of your personal information. The table below contains a summary of those rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require any mistakes in your personal data to be corrected
To be forgotten	The right, in certain circumstances, to require that your personal data is deleted
Restriction of processing	The right, in certain circumstances, to require use of your personal data to be restricted (for example, if you contest the accuracy of the data)
Data portability	The right, in certain circumstances, to receive your personal data in a

	structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object to your personal data being processed for direct marketing (including profiling) and the right, in certain circumstances, to object to the continued processing of your personal data on the basis of legitimate interests
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

10.2 If you wish to exercise any of your rights, you can contact the Data Protection Officer.

10.3 If you request the exercise of any of your rights we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

11. How to complain

11.1 We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal data.

11.2 The UK General Data Protection Regulation also gives you right to lodge a complaint with the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

12. Changes to this privacy policy

12.1 This privacy notice was first published on 26/01/2026

12.2 We may update this privacy notice from time to time. We will make updated versions of our privacy notice available on our website.

13. How to contact us

13.1 Please contact us/our Data Protection Officer by email if you have any questions about this privacy policy or the personal data we hold about you.

13.2 Our contact details are shown below:

Data Protection Officer DPO@gwynedd.llyw.cymru