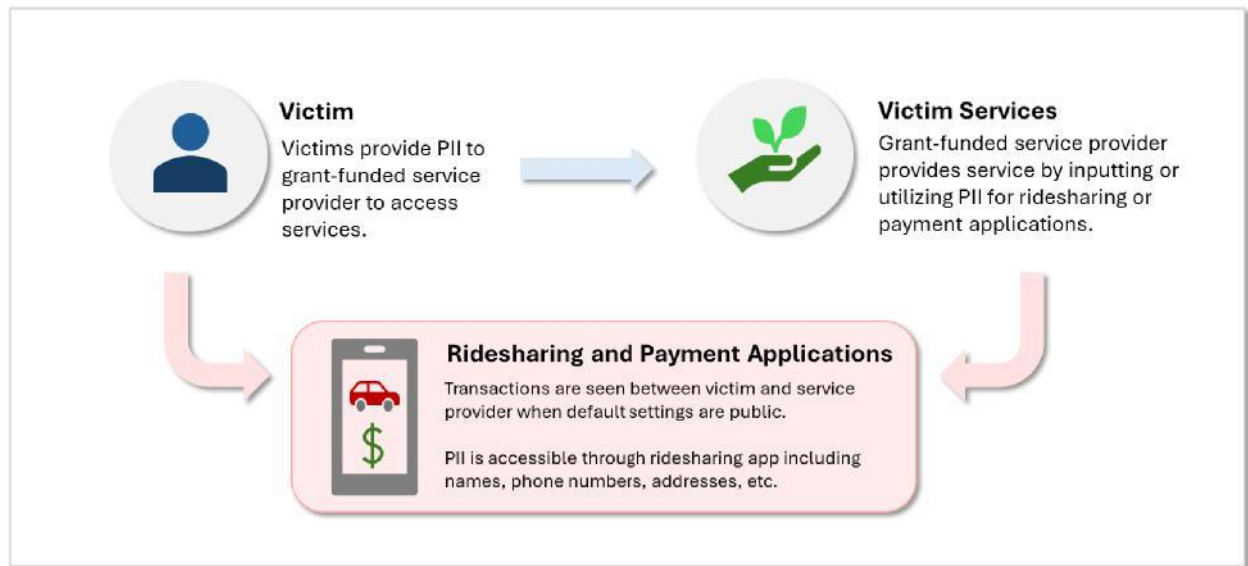


Ridesharing Information for Subrecipients of VOCA and VAWA Funding

Rideshare services can be integral to meeting transportation needs and a valuable resource for victims and survivors to receive services. However, OVC and OVW have reminded us that the use of rideshare services for victims and survivors raises concerns regarding the lack of user privacy and potential exploitation of data.



According to the [GSA Rules of Behavior for Handling Personally Identifiable Information \(PII\)](#), PII “refers to information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.” PII is also defined in the Violence Against Women Act ([34 U.S.C. 12291\(a\)\(25\)](#)) as “individually identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, regardless of whether the information is encoded, encrypted, hashed, or otherwise protected, including--(A) a first and last name; (B) a home or other physical address; (C) contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number); (D) a social security number, driver license number, passport number, or student identification number; and (E) any other information, including date of birth, racial or ethnic background, or religious affiliation, that would serve to identify any individual.”

I. Privacy and Confidentiality Requirements

The U.S. Congress codified victim confidentiality in the Violence Against Women Act (34 U.S.C. 12291(b)(2)), the Family Violence Prevention and Services Act (42 U.S.C. § 10401), and the Victims of Crime Act (34 U.S.C. § 10101 et seq.). These laws prohibit sharing PII about victims without informed, written, time-limited consent, and they prohibit disclosure of individual information without written consent. Additionally, some (but not all) OJP and OVW awards include measures to address victim confidentiality and privacy, such as requiring written policies to maintain confidentiality and guidance on reporting breaches. Subrecipients should

review their award conditions to ensure compliance with confidentiality and privacy requirements.

II. Raising Awareness

OVC and OVW recognize the importance of raising awareness of safeguarding victim and survivor information when using rideshare services. They've shared the following resources that may help as you review and update your current transportation policy.

[Using Uber: Safety & Privacy Considerations for Survivors](#), National Network To End Domestic Violence, Safety Net Project, March 2023.

[APPLE SAFETY CHECK TIPSHEET](#), National Domestic Violence Hotline, 2023.

[National Institutes of Health's National Library of Medicine, "Safeguarding patients from technology-facilitated abuse in clinical settings: A narrative review."](#) PMID 9931347, January 4, 2023.

[Safety Net Project: Exploring Technology Safety in the Context of Intimate Partner Violence, Sexual Assault, and Violence Against Women](#), National Network to End Domestic Violence, Safety Net Project, 2019.

III. CVSSD Guidance

Programs coordinating rides using Uber, Lyft, or other fee based rideshare services, for victims and survivors should have a written organization/program policy & procedure for coordination and payment of rideshare services.

Policy & Procedures should include:

- ✓ Steps to ensure confidentiality for victim/survivor and safe shelter location.
- ✓ Discuss with victim/survivor how to ensure their anonymity and safety.
- ✓ Method for payment that is not connected to the victim service program.

Things to consider:

- ✓ Do you provide client name or an alias?
- ✓ Does the organization/program information need to be provided?
- ✓ Do you provide an alternate location for pick up/drop off to ensure confidentiality?
- ✓ Does it cost more to pre-schedule a ride opposed to coordinating a ride in real time?
- ✓ Do you ensure confidentiality when using a non-ride share business such as community senior center or county transportation?
- ✓ Does the organization/program coordinate the ride or provide the referral and have the client coordinate the ride?