



Service User Privacy Notice

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you whilst we are working with you and for a period thereafter. It also explains your rights under the law relating to your personal data. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'Privacy Notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Who collects and uses the information?

Frontline Fife (the 'Charity') is a 'data controller' and gathers and uses certain information about you.

Where the Charity is also a 'data processor', we will process information received from third parties about you.

Frontline Fife is a Company Limited by Guarantee registered in Scotland under company number 179304 and is a Registered Scottish Charity No SC021832.

Registered address:
57 - 59 Viewforth Street
Kirkcaldy
Fife
KY1 3DJ

We are regulated by:

- The Care Inspectorate
- Scottish National Standards for Information and Advice Services.
- The Scottish Social Services Council
- OSCR (Office of the Scottish Charity Regulator)

In the event that one of these regulators inspect our services, consent will always be sought from you before we grant them access to your case file.

What is personal data/information?

Personal data is defined under data protection laws in the UK and Europe as 'any information relating to an identifiable person who can be directly or indirectly identified' and is, in effect, any information about you that enables you to be identified. This would include obvious information such as your name and contact details but could include other information like data relating to your circumstances which can be put together to deduce your identity.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

The Data protection principles are:

1. Processing is lawful, fair and transparent

We have identified and documented our legal basis for processing your data (set out in the below schedules). We use this privacy notice to inform you about the data we process and treat you fairly in relation to the data we process

2. Purpose limitation

We specify our purposes for processing each category of processing and set these out in the below schedules

3. Data minimisation

We only process the minimum data required to fulfil our specified purpose

4. Accuracy

We do our best to ensure that all the personal data we process in relation to your case is accurate

5. Storage limitation

We only keep the personal data that we process for as long as we need it. Our retention periods are set out in our data protection policy.

6. Security

We take appropriate technical and organisational measures to ensure that the personal data that we process is stored securely.

7. Accountability

In our capacity as a Data Controller, we are accountable to these data protection principles and can show how we comply with these requirements.

Who we may share data with

The tables below set out on the following pages summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared per service. Generally, we share data as follows:

Sharing data with consent with Partners within the PSP

Frontline Fife are a Partner of the Public Social Partnership. As such we work collaboratively with the following bodies in providing Housing Services and Support:

- Fife Council
- The NHS
- Fife Housing Association
- Kingdom Housing Association
- Glen Housing
- Ore Valley Housing

- Ochil View Housing Association
- Hillcrest Housing Association
- Caledonia Housing Association
- Dunedin Canmore Housing Association
- Disabled Persons Housing Service
- Trust in Fife
- Glenrothes YMCA
- Gilven Project
- Link Living

These Partners are all subject to a Data Sharing Agreement which each party has agreed and signed up to. As such, this agreement ensures that appropriate data protection measures are taken by each party and that the processing and sharing of data is regulated.

The Frontline Fife Services which operate under the PSP Data Sharing Agreement are:

- Fife Housing Group Service
- Housing Management
- Core and Cluster
- Short-Term Housing Support
- Digital Short-Term Housing Support
- Housing Advice

Under this agreement, PSP partners (including Frontline Fife) will seek consent before sharing your data for the purposes of making referrals and providing support.

Sharing with consent with a 3rd party

As well as this sharing, we may also seek your explicit consent to share data with other parties who may be relevant to your support but are not subject to this data sharing agreement. For example, for the purposes of making an onward referral at your request with another charity to allow you to access their support. Furthermore, we may share data with your explicit consent with 3rd party auditors to assess the quality of service that we provide.

Circumstances where we may be required to share data without your consent

We may also need to share some of the categories of personal information set out below with other parties. There are circumstances where we are required to share this data without your consent. This includes situations where we share data with social work or the emergency services when we believe you or another person is at risk of harm. We may be required to share data with Government agencies such as the Police in other appropriate circumstances such as if we are required to by law to provide data to the police for the prevention or detection of crime. We may also be required to provide data to our professional advisors, regulators and funders. Information may be anonymised depending on the circumstances, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We seek to ensure that our information collection and processing is always proportionate - that is, we only collect and process what we need to, and we only store it for as long as we need to. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

Information may be held at our offices and by third-party agencies, service providers, representatives and agents. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

How long we keep your information

We keep your information for no longer than is necessary; this normally means whilst we are working with you and for a period thereafter the length of which will depend on the nature of the service and support we are providing to you. In most cases, we will not keep your information for more than 7 years after you last contact us. Further details are set out in our Data Retention Policy and the schedules at the end of this document.

Your rights

Under the GDPR, you have the following rights, which we will always work to uphold:

1. The right to be informed about the personal data we collect and use about you. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
2. The right to access the personal data we hold about you. This is called making a Subject Access Request - please see below for instructions on how to make a request.
3. The right to have your personal data rectified if any of your personal data we hold is inaccurate or incomplete. Please contact us using the details at the bottom to find out more.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details at the bottom to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another organisation or business in certain cases.
8. Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about how we use your personal data or to exercise any of your rights as outlined above, please contact us using the details provided below. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau. If you have any cause for complaint about how we use your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them through their website at www.ico.org.uk or can call them on 0303 123 1113.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Changes to what we do

We regularly review and, where necessary, update our privacy information, policies, procedures and privacy notices. If we plan to use your personal information for a new purpose, we will update our documentation and privacy notice, and communicate the changes to you before starting to use the information in a new way. Where we have obtained your consent to process your personal data and we wish to change how we process it, we will seek your consent for the new processing. Sometimes we have to change what we do because of a change in the law or we need to change the way we do things as an organisation and have a legitimate interest for doing so.

The latest version of this Privacy Notice will always be available at www.frontlinefife.co.uk

How to contact us

For information about how we collect, store and process your personal data or for any questions or concerns you might have about data protection please contact our Data Protection Officer at natasha.johnstone@frontlinefife.co.uk or speak to your support worker.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at www.ico.org.uk/make-a-complaint/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

1. Fife Housing Group Team

Who is the Data Controller in relation to this processing?

This service is split into two parts; temporary accommodation services and support services.

Temporary Accommodation Services

Frontline Fife provide temporary accommodation on behalf of Fife Housing Group. As such, Fife Housing Group are the Data Controller in relation to data processed for the provision of this services.

What does this mean?

We have an agreement in place between Fife Housing Group and Frontline Fife which regulates the way Frontline Fife are permitted to process data on behalf of the Data Controller, Fife Housing Group. Under this agreement, we process your name, address, telephone number and email address on behalf of Fife Housing Group for the purposes of administering the service. As Data Controller, Fife Housing Group have access to this data.

Support Services

Frontline Fife provide Short-Term Housing Support on in collaboration with Fife Council and Trust in Fife. As such, Frontline Fife are joint Data Controllers for data processed in relation to support you receive. Support is provided as part of the Public Social Partnership (as detailed in the previous pages of this Privacy Notice) and have agreements in place ensuring your data processed securely by Frontline Fife. Where data has been shared with our Partners with your consent, our agreements also ensure that our partners process your data securely.

Does this Schedule apply to me?

This schedule applies to you if you are taking up/have taken up temporary accommodation with Frontline Fife at a Fife Housing Group property. If you are unsure if this schedule applies to you, please speak to your case worker for clarification.

The information we collect	How we collect the information	Why we collect the information and our legal basis for processing	Who we may share the information
<u>Referral data</u> Data includes: <ul style="list-style-type: none">• Name• Address• contact details• personal details	We collect this information when we receive a referral from a partner organisation. They only share this data with us with your consent.	<ul style="list-style-type: none">• GDPR Article 6 (1) (a): consent (shared with Frontline Fife with your consent) Frontline Fife process this information because you have indicated to our partner organisation that you wish to receive our services for the purposes of allowing you to gain access to the service.	This data is not shared out with Frontline Fife

<p><u>Initial Assessment data</u></p> <p>This includes data relating to:</p> <ul style="list-style-type: none"> • Health • substance misuse • current circumstances • ethnic origin • gender • marital status • financial details • criminal convictions 	<p>We collect this data directly from you on the basis of your explicit consent.</p> <p>This data includes sensitive data as follows:</p> <p><u>Special category data:</u></p> <p>Health, ethnic origin, religion</p> <p><u>Criminal conviction data</u></p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a): Consent to process special category data <p><u>Criminal Conviction Data</u></p> <ul style="list-style-type: none"> • Data Protection Act, Schedule 1, Part 3, para.29: Consent to process data in relation to criminal convictions. <p>Frontline Fife process this data in order to assess your case in order to allow Frontline Fife to provide you with support.</p>	<p>This data is not shared out with Frontline Fife.</p>
<p><u>Risk Assessment data</u></p> <p>This includes data relating to:</p> <ul style="list-style-type: none"> • Adverse behaviour of the data subject • sexual and racial abuse • allegations against staff • risks to children • sexual disinhibition • physical/mental health • substance misuse • suicidal intent and self-harm • self-neglect • isolation • financial exploitation • loss of tenancy • abuse by carers • unsafe with gas and electricity 	<p>We collect this data directly from you on the basis of your explicit consent.</p> <p>This data includes sensitive data as follows:</p> <p><u>Special category data:</u></p> <p>Health</p> <p><u>Criminal conviction data</u></p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent • GDPR Article 6 (1)(c): legal obligation - common law duty of care for staff and tenants <p><u>Special category data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a): consent to process special category data <p>We collect this data in order to identify risks to our staff, Fife Housing Group Property and other tenants for the purposes of safeguarding.</p>	<p>This data is not shared out with Frontline Fife.</p>

<p><u>Data shared with us by Social Work</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Previous involvement with Social work/criminal justice • Case Conference minutes 	<p>If you are working with social work, social work share data with us. Social Work do not share data with us without your consent.</p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent (shared with Frontline Fife with your consent) <p>We process this data in order to provide our input into your case during case conferences.</p>	<p>This data is not shared out with Frontline Fife.</p>
<p><u>Emergency contact details</u></p> <p>Data includes:</p> <p>Names and contact details of:</p> <ul style="list-style-type: none"> • next of kin • other professionals that work with you (i.e. GP, Dentist, Social worker etc) 	<p>We collect this data directly you on the basis of your consent.</p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent • GDPR Article 6 (1)(c): legal obligation - common law duty of care • Article 6(1)(f): legitimate interest <p>We collect this data for the purposes of responding to an emergency situation in relation to the data subject. The details of professionals the data subject works with are also stored for emergencies.</p>	<p>This data is not shared out with Frontline Fife</p>
<p><u>Incident Report Data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Outline of Incident • Injuries caused by incident • if emergency services contacted • what contributed to the incident • lasting effect, injury or damage 	<p>We collect this data from you, witnesses the incident staff members</p> <p>This includes sensitive data as follows:</p> <p><u>Special category data</u></p> <p>Health</p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent • GDPR Article 6 (1)(c): legal obligation - common law duty of care to tenants <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a): Consent to process special category data 	<p>This data is shared with Fife Council</p>

<p><u>Support Plan Data</u></p> <p>Data relates to:</p> <ul style="list-style-type: none"> • Accommodation • Health • Safety and Security • Financial and Economic Wellbeing • Social Skills/Wellbeing • Training and Employability 	<p>We collect this data directly from (and set goals in collaboration with) you.</p> <p>This includes sensitive data as follows:</p> <p><u>Special Category Data</u></p> <p>Health</p> <p><u>Criminal Conviction Data</u></p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a): Consent to process special category data <p><u>Criminal Conviction Data</u></p> <ul style="list-style-type: none"> • Data Protection Act 2018, Schedule 1, Part 3, para.29 	<p>This data is not shared out with Frontline Fife</p>
<p><u>Case Note Data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Contact with the service user • Relevant data collected under this privacy notice • Things of note relevant to support provided or the tenancy • Contact with 3rd parties relevant to support 	<p>Case note data is comprised of service workers observations as well as data shared relevant to your support which is shared with us by third parties with your consent.</p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (a): consent <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a): Consent to process special category data 	<p>This data is not shared out with Frontline Fife</p>
<p><u>Administration of the Service Data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Name • Address • National Insurance Number • Date of birth • Contact information • Internal Transfer Requests • Date of entry to and departure from property 	<p>We collect this data directly from the service user, other tenants and support worker observations</p>	<ul style="list-style-type: none"> • GDPR Article 6(1)(f): legitimate interest • GDPR Article 6 (1) (b): performance of a contract • GDPR Article 6 (1) (a): consent <p>This data is processed for the purposes of administering the temporary accommodation and support service that Frontline Fife provide.</p>	<p>This data is shared with Fife Council and Fife Housing Group.</p> <p>(Continued)</p>

<ul style="list-style-type: none"> Name of Homeless Persons Officer Debt and arrears Property repairs 		<p>Internal transfer request data is processed when it is necessary to move an occupant of temporary accommodation to another property in the event of an emergency or in the interests of the occupant or other occupants of the property.</p> <p>This is stipulated in the occupancy agreement. We process this data in order for the administration of this contractual right.</p>	
<p><u>Contractual Agreements</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> Name Signature Terms agreed 	<p>We collect this data directly from you</p>	<ul style="list-style-type: none"> Article 6(1)(c): compliance with a legal obligation 	<p>This data is not shared out with Frontline Fife</p>
<p><u>Contact with Head Office</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> Records of calls you make to Frontline Fife Records of letters sent to you Records of letters received from you Records of Fort Referrals 	<p>We collect this data when you make a call or send a letter to Head Office or when a referral is made to us on Fort.</p>	<ul style="list-style-type: none"> GDPR Article 6(1)(f): Legitimate interest <p>We process this data order to aid in administering the service we provide.</p>	<p>This data is not shared out with Frontline Fife</p>

<p><u>Complaints about Frontline Fife</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Contact details • summary of the complaint being made 	<p>We collect this data when the service user submits a complaint to us about the service we provide.</p> <p>We may anonymise your complaint and use it for training purposes for Frontline Fife staff.</p>	<ul style="list-style-type: none"> • GDPR Article 6 (1) (f) Legitimate interest • GDPR Article 6 (1) (b) Performance of a contract. <p>We process this data in order to receive, administer and take action in relation to complaints made by service users in relation to Frontline Fife services.</p>	<p>We may share data with our regulators including the Care Inspectorate.</p> <p>We may also be required to share your data with the Scottish Public Services Ombudsman should your complaint not be satisfied internally.</p>
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