



## 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.

Frontline Fife is a company limited by guarantee registered in Scotland under company number 179304 and is a Registered Scottish Charity under Scottish Charity No SC021832.

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

We are regulated by:

- The Care Inspectorate
- The Scottish Social Services Council

### What is personal data/information?

This notice applies in relation to the processing of your personal data. 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. We do not (further) process data for reasons out with these purposes.

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:

#### Public Social Partnership Members

Frontline Fife are a Partner of the Public Social Partnership. As such, depending on your case, we work collaboratively with the following bodies in providing Short-Term Housing Support:

- Trust in Fife
- Barony Housing Association
- Bethany Christian Trust
- ENeRGI
- Fife Women's Aid
- Kingdom Support & Care CIC
- Penumbra
- Link Living

- The Richmond Fellowship (Scotland)
- YMCA Glenrothes

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. We will not share data with these partners without first seeking your consent.

#### Sharing with consent with a 3<sup>rd</sup> 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 3<sup>rd</sup> 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**

Frontline Fife primarily store short-term housing support data using the FORT database. Data may also be held securely 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 5 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](http://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](http://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](mailto: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/](http://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. Short-Term Housing Support:

### Who is the Data Controller in relation to this processing?

Frontline Fife are Data Controllers for the purposes of data we process for providing you with Short-Term Housing Support.

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 with
<p><u>Referral data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> <li>Name</li> <li>date of birth</li> <li>national insurance number</li> <li>contact details</li> <li>health</li> <li>substance and alcohol misuse</li> <li>criminal convictions</li> <li>ethnic origin</li> <li>type of support required</li> </ul>	<p>We receive referrals one of our partners within the PSP which includes this data.</p> <p>This data is shared with Frontline Fife with your consent</p> <p><u>Special Category data:</u></p> <p>Health, ethnic origin</p> <p><u>Criminal Conviction Data</u></p>	<p>Please see Privacy Notice issued by Fife Council regarding referrals by visiting <a href="http://www.fifedirect.org.uk/privacy/sths">www.fifedirect.org.uk/privacy/sths</a></p> <p><u>Consent</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6 (1) (a): (sought from referrer)</li> </ul> <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> <li>GDPR Article 9 (2) (a) (sought from referrer)</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data for the purpose of Frontline Fife assessing if our services are appropriate for your case and circumstances.</p> <p>We also use this data for the purposes of administering the service and the support we provide.</p>	<p>This data is not shared out with Frontline Fife</p>
<p><u>Risk Assessment</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> <li>Health</li> <li>substance or</li> </ul>	<p>We use data provided in the referral to conduct an internal risk assessment.</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6 (1) (a):</li> </ul> <p><u>Special category data - consent</u></p>	<p>This data is not shared out with Frontline Fife</p>

<p>alcohol misuse</p> <ul style="list-style-type: none"> <li>• other support services used</li> <li>• abuse or violence due to discrimination</li> <li>• if living with person protected under the Child Protection Act</li> <li>• if vulnerable</li> <li>• history of violence</li> <li>• criminal conviction data.</li> </ul>	<p>This data is shared with us with your consent.</p> <p>We also use data you provide us in the initial assessment that we process with your consent.</p> <p>This includes sensitive data as follows:</p> <p><u>Special Category data:</u> Health, ethnic origin</p> <p><u>Criminal Conviction Data</u></p>	<ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a)</li> </ul> <p><u>Criminal Conviction data – consent</u></p> <ul style="list-style-type: none"> <li>• Data Protection Act 2018, Schedule 1, part 1, para.29</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data to assess and mitigate risks to safeguard staff (for example, for lone working)</p>	
<p><u>Initial Assessment data</u></p> <p>This includes data relating to:</p> <ul style="list-style-type: none"> <li>• Health</li> <li>• substance misuse</li> <li>• current circumstances</li> <li>• ethnic origin</li> <li>• gender</li> <li>• marital status</li> <li>• financial details</li> <li>• criminal convictions</li> </ul>	<p>We collect this data directly from you when assessing your support needs.</p> <p>This includes sensitive data as follows:</p> <p><u>Special category data</u></p> <p>Health, ethnic origin</p> <p><u>Criminal Conviction data</u></p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6 (1) (a)</li> </ul> <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a)</li> </ul> <p><u>Criminal Conviction data - consent</u></p> <ul style="list-style-type: none"> <li>• Data Protection Act 2018, Schedule 1, part 1, para.29</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data in order to assess your case and current circumstances 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>Contractual Agreement</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> <li>• Terms agreed to</li> <li>• Name</li> <li>• Signature</li> </ul>	<p>We collect this data directly from you</p>	<p><u>Necessary for a contract</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6(1)(b)</li> </ul> <p><u>Legal obligation</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6 (1)(c)</li> </ul> <p><u>Purpose of processing data</u></p> <p>Frontline Fife process this data in order to evidence your agreement to the Short-Term Housing Support Agreement.</p>	<p>This data is not shared out with Frontline Fife</p>
<p><u>Case Note</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> <li>• Challenges being faced as reported by the data subject</li> <li>• Support we have/ are providing</li> <li>• details from meetings</li> <li>• data provided to us by PSP partners/social work.</li> </ul>	<p>We use data provided to us by PSP partners as well as data we collect during your support. Staff also record their own observations in your case note.</p> <p>Data shared with us by PSP partners or Social Work is shared with us with your consent</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6 (1) (a)</li> </ul> <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a)</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data in order to keep a record of the support you have been provided as well as issues you may be facing in order to ensure needs are being met.</p>	<p>If you are working with Social Work, data may be shared with them so they may monitor the support you are receiving.</p> <p>In the case of joint cases with Fife Council, updates may be provided to Fife Council for them to monitor your support.</p> <p>Otherwise, data is not shared out with Frontline Fife</p>
<p><u>Support Plan</u></p> <p>Data relates to:</p> <ul style="list-style-type: none"> <li>• Accommodation, health</li> <li>• safety and security</li> <li>• Financial and Economic wellbeing</li> <li>• Social Skills/Wellbeing</li> </ul>	<p>We collect this data directly from (and set goals in collaboration with) you.</p> <p>This data includes sensitive data as follows:</p> <p><u>Special category data</u></p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6 (1) (a)</li> </ul> <p><u>Special Category Data</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a)</li> </ul> <p><u>Criminal Conviction data - consent</u></p> <ul style="list-style-type: none"> <li>• Data Protection Act 2018, Schedule 1, part 1, para.29</li> </ul>	<p>If you are working with Social Work, data may be shared with them so they may monitor the support you are receiving.</p> <p>In the case of joint cases with Fife Council, updates may be provided to Fife Council for them to monitor your support.</p> <p>Otherwise, data is not shared out with Frontline</p>



<ul style="list-style-type: none"> <li>• Training and Employability</li> </ul>	<p>Health <u>Criminal Conviction Data</u></p>	<p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data for the purposes of assessing how the service user feels about aspects of their life and help them set goals accordingly.</p> <p>We also use this data to assess what support we can provide.</p>	<p>Fife (Continued)</p>
<p><u>Support Review</u></p> <p>Data includes:</p> <p>What has been achieved and work outstanding and action to be taken in relation to the data subjects’:</p> <ul style="list-style-type: none"> <li>• Accommodation</li> <li>• health</li> <li>• safety and security</li> <li>• finances</li> <li>• social skills and general wellbeing</li> <li>• training and employability</li> </ul> <p>We also collect data on your satisfaction with the support and any comments you may have.</p>	<p>We collect this data directly from (and set goals in collaboration with) you</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>	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 6 (1) (a)</li> </ul> <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> <li>• GDPR Article 9 (2) (a)</li> </ul> <p><u>Criminal conviction data - consent</u></p> <ul style="list-style-type: none"> <li>• Data Protection Act 2018, Schedule 1, part 1, para.29</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data for the purposes of assessing how the service user feels about the support we have provided and what additional support, if any, is required.</p>	<p>If you are working with Social Work, data may be shared with them so they may monitor the support you are receiving.</p> <p>In the case of joint cases with Fife Council, updates may be provided to Fife Council for them to monitor your support.</p> <p>Otherwise, data is not shared out with Frontline Fife</p>

<p><u>Exit Survey</u></p> <p>Data includes:</p> <p>Service user feedback for the support provided</p>	<p>We collect this data directly from the service user</p>	<p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6(1)(f)</li> </ul> <p><u>Purpose of processing data:</u></p> <p>Frontline Fife process this data for the purposes of assessing the level of service provided to the service user, considering any comments made and implementing appropriate changes and/or training If required.</p>	<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"> <li>Records of calls you make to Frontline Fife</li> <li>Records of letters sent to you</li> <li>Records of letters received from you</li> <li>Records of Fort Referrals</li> </ul>	<p>We collect this data when you make a call to one of our offices, send us a letter or a referral is made to us on Fort.</p>	<p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6(1)(f)</li> </ul> <p><u>Purpose of the processing:</u></p> <p>We process this data order to administer 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"> <li>Contact details</li> <li>summary of the complaint being made</li> </ul>	<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>	<p><u>Legitimate interest</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6 (1) (f)</li> </ul> <p><u>Performance of a contract</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6 (1) (b)</li> </ul> <p><u>Purpose of processing data:</u></p> <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>

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## 2. Digital Short Term Housing Support

For service users who receive Digital Short-Term Housing support, as well as the above data, Frontline Fife also process data as outlined below.

### Who is the Data Controller in relation to this processing?

Frontline Fife is the Data Controller for data processed in providing you Short-Term Housing Support. Where a Service user utilises our Digital Support through WhatsApp, the administrators of WhatsApp are joint Data Controllers of this data. For more information on how WhatsApp use your data, please see their privacy notice by visiting:

<https://www.whatsapp.com/legal/updates/privacy-policy>

Service users should also consult the Frontline Fife Digital Support Code of Conduct and adhere to the requirements in relation to data protection.

As well as the information processed in providing short term housing support as detailed above, Frontline Fife in providing digital support will also process data as follows:

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 with
Contents of WhatsApp Group Chats	Staff administering digital short-term housing support will have access to WhatsApp messages sent.	<p><u>Consent</u></p> <ul style="list-style-type: none"> <li>GDPR Article 6 (1) (a)</li> </ul> <p><u>Purpose of Processing Data:</u></p> <p>Frontline Fife process this data for the purposes of providing ongoing digital support services.</p>	<p>This data is not shared out with Frontline Fife.</p> <p>However, other members of the chat will also have access to any disclosures you make within the group chat.</p>