



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. 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:

Sharing Data within Fife Alcohol and Drug Partnership

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Frontline Fife are a Partner of the Fife Alcohol and Drug Partnership. As such, we are a party to the Information Sharing Protocol for Triage Services. Under this agreement, we work collaboratively with the following bodies in providing support in relation to alcohol and substance misuse:

- NHS Addiction Services
- NHS Fife Community Pharmacies

- Fife Intensive, Rehabilitation and Substance Misuse Team (FIRST)
- Drugs and Alcohol Project Limited (DAPL)
- ADAPT
- Frontline Fife
- NHS Fife Psychology Services
- Fife Alcohol Support Services (FASS)
- Fife Community Drugs Team
- Addaction
- NHS Fife Vulnerable in Pregnancy Midwifery Service
- NHS Fife Blood Borne Virus Service

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

- Frontline Fife ADP Service

Parties under this agreement share data when required to make an onward referral to another partner who is more equipped to provide support. Please note, Frontline Fife will not share information for the purposes of making such a referral without first seeking your explicit consent. The agreement also requires that all ADP Partners maintain appropriate data security of the data that is shared to ensure compliance with data protection laws.

Sharing with consent with a 3rd party

As well as this sharing, we may also seek your 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 Alcohol and Drug Partnership Team

Who is the Data Controller in relation to this processing?

The Data Controller in relation to this service is Fife Council. Frontline Fife are a Data Processor in relation to this processing. This means that Fife Council has overall responsibility for data protection in relation to this processing

Does this schedule apply to me?

This schedule applies to service users who have been referred to Frontline Fife in relation to the provision of support for alcohol and substance misuse. Frontline Fife is one of the partners which comprise the Fife Alcohol and Drug Partnership. If you are unsure if this schedule applies to you, please speak to your case worker for confirmation.

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"> Name contact details the reasons why support is needed from us 	<p>We collect this information when it is provided to us in an initial referral that we receive from one of the Fife ADP Partners. This data is shared with us by one of our partners with your consent.</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> GDPR Article 6 (1) (a) (shared with Frontline Fife with your consent) <p><u>Special Category Data - consent</u></p> <ul style="list-style-type: none"> GDPR Article 9 (2) (a) (shared with Frontline Fife with your consent) <p>We use data contained in the referral in order for us to contact you to offer you support as you have requested.</p>	<p>Data is shared if you request us to make an onward referral to a Partner of ADP at your request when one of these partners is more suited to provide you with support. We will only share this data having first sought your explicit consent.</p> <p>We also share data with the Scottish Prison Service in relation to service users currently in prison, in order to administer your support.</p>
<p><u>Triage data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> Name contact details ethnicity religion benefits marital status employment 	<p>We collect this data directly from you when you decide to use our services. This data is collected during the triage process.</p> <p><u>Special Category Data:</u> Health, religion, ethnic</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> GDPR Article 6 (1) (a) <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> GDPR Article 9 (2) (a) Consent to process special category data 	<p>Data is shared if you request us to make an onward referral to a Partner of ADP at your request when one of these partners is more suited to provide you with support. We will only share this data having first sought your explicit consent.</p>

<ul style="list-style-type: none"> • accommodation • health • substance misuse • family details • history of violence or aggression • overdose • living situation • engagement with support 	<p>origin</p> <p>If you have already completed a triage form with one of our partners, this data may also have been shared with us with your consent by the partner that conducted the triage with you.</p>	<p>We use this information to triage our clients.</p> <p>We process this data for the purposes of safeguarding staff as to assess your support needs and if there is a need to refer you to partner agencies who may be more equipped to provide you with support.</p>	<p>(Continued)</p>
<p><u>Details of Criminal Convictions</u></p>	<p>We collect this data directly from you when you decide to use our services. This data is collected during the triage process.</p> <p>This data may also have been shared with us with your consent by another partner of the Fife ADP.</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> • Article 6 (1) (a) consent <p><u>Criminal conviction data - consent</u></p> <ul style="list-style-type: none"> • Data Protection Act 2018 Schedule 1, Part 3, paragraph 29: consent to process criminal conviction data <p>We process this data for the purposes of safeguarding our staff and mitigating any potential risks.</p>	<p>Data is shared if you request us to make an onward referral to a Partner of ADP at your request when one of these partners is more suited to provide you with support. We will only share this data having first sought your explicit consent.</p>
<p><u>Case Note Data</u></p> <p>Data includes:</p> <ul style="list-style-type: none"> • Details of meetings with professionals • Level of engagement with service • Appointment dates and outcomes 	<p>We collect this data directly from you as well as recording the observations of your support worker.</p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> • Article 6 (1) (a) <p><u>Special category data - consent</u></p> <ul style="list-style-type: none"> • GDPR Article 9 (2) (a) <p><u>Criminal conviction data - consent</u></p> <ul style="list-style-type: none"> • Data Protection Act 2018 Schedule 1, Part 3, paragraph 29 	<p>This data is not shared out with Frontline Fife</p>

		We process this data for the purposes of monitoring your support	
<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 to one of our offices, send us a letter or 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 in 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>