

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 the 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 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 this information?

FIRST (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. FIRST is a Company Limited by Guarantee registered in Scotland (company number SC298843) and is a Registered Scottish Charity (charity number SC034270). Registered address being Carlyle House, Carlyle Road, Kirkcaldy, KY1 1DB. We are regulated by OSCR and the Care Inspectorate.

What is personal data?

Personal data can be determined as 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 less obvious information such as identification numbers, electronic location data and other online indicators. The personal data we collect, process and store are set out in this Notice.

FIRST will only do so with your explicit consent and in accordance to applicable data protection legislation, including the General Data Protection Regulation (GDPR).

What personal data does FIRST collect?

The personal information collected by us will be limited to that which is essential to allow us to provide the support you receive. This will include:

- Names, genders, addresses, telephone numbers and email addresses.
- Employment, housing, disabilities (such as physical or learning disabilities).
- Health and home circumstances (such as substance use, prescribed medication, domestic abuse, mental health and pregnancy).
- Details of any other support services/agencies being used (such as GP, social work, addiction services, CPN/mental health).
- In the case of children, additional information as to where the child is living, subject to child protection, etc).
- Goals/outcome progress and reason for closure of episode of care (for anonymised reporting to funders).

How we will use your personal data and who it will be shared with

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 purpose for which we collect and process it. 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. The latest version of the Privacy Notice will always be available on our website www.firstforfife.co.uk.

Internal

Our Support Workers and Rehabilitation Workers may discuss your details with the relevant Co-ordinator for guidance/advice to ensure you receive the best support possible. Support from fellow colleagues may also be discussed at monthly team meetings. All discussions take place in a confidential and professional setting and only include relevant details.

All information provided to the Board of Directors for the purpose of assessing the level of referrals, staffing requirements, etc are anonymised.

External

We will, on an anonymised basis, use your personal information to demonstrate the impact of our service and to highlight local trends (such as referrals, age, substance, locality).

We will, on an anonymised basis, use your personal information in the use of reporting to show the impact of our service to current funders.

We may share your personal information with external agencies (Care Inspectorate) for quality auditing purposes in the presence of the Service Manager or Co-ordinator and only after the auditors have provided us with the necessary underwritings to preserve the confidentiality of your information.

We will share personal information with law enforcement or other authorities if required by applicable law including and in line with Safeguarding and Promoting the Welfare of Children/Safeguarding Adults at risk policies, where there are concerns about the wellbeing of a child or adult at risk and is considered necessary for their welfare and protection.

We will not share your personal information with any other third party without first obtaining your explicit consent.

How long personal data will be kept?

We will keep your personal information after we have finished providing our support to respond to any questions, complaints by you or on your behalf, to show that we treated you fairly and/or to keep records required by law. We will keep the information no longer than necessary.

Keeping your personal data secure

We have appropriate security measures in place to prevent your information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Information will be processed in an authorised manner and subject to a duty of confidentiality. Security, access login details, etc are monitored by our certified IT specialists. We are legally required to notify you of any suspected breaches of security.

Your rights

Under GDPR, you have the following rights, which we 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 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.

- 3) The right to have your personal data rectified if inaccurate or incomplete.
- 4) The right to be forgotten eg the right to ask us to delete or otherwise dispose of any of your personal data we have.
- 5) The right to restrict eg 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 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 on each of these rights, including the circumstances in which they apply, please visit the Information Commissioner's Office (ICO) website at <https://ico.org.uk/for-the-public/>.

If you would like to exercise any of these rights, please email, call or write us using the details in the 'How to contact us' section below.

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 April Adam, Service Manager at:

Email april.adam@firstforfife.co.uk
Telephone 01592 585960
Postal address Carlyle House, Carlyle Road, Kirkcaldy, Fife, KY1 1DB

How to complain

We hope that April Adam, Service Manager can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at:

Email www.ico.org.uk/concerns
Telephone 0303 123 1113

for further information about your rights and how to make a formal complaint.