

# 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?**

Fife Gingerbread (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.

Fife Gingerbread is a Company Limited by Guarantee registered in Scotland under company number SC365015 and is a Registered Scottish Charity No. SCO24254.

Registered address: Greig Institute, Forth Street, Leven, Fife KY8 4PF

Main trading address: Greig Institute, Forth Street, Leven, Fife KY8 4PF.

We are regulated by: OSCR the independent Regulator and registrar for Scotland's charities.

## **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 less obvious information such as identification numbers, electronic location data, and other online identifiers. The personal data that we collect, process and store is set out in this Notice.

## **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.

## **About the information we collect and hold**

The table 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.

We may also need to share some of the categories of personal information set out below with other parties, such as to other agencies to support you or a member of your family. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our funders (which will be anonymised) or as is necessary or required to comply with the law.

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. There are also specific circumstances that will impact on retention time i.e. looked after and accommodated children. Further details are set out in our Data Retention Policy.

### **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 on our website [www.fifegingerbread.org.uk](http://www.fifegingerbread.org.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:

Rhona Cunningham  
 Grieg Institute  
 Forth Street  
 Leven  
 Fife KY8 4PF  
 Email: [rhona@fifegingerbread.org.uk](mailto:rhona@fifegingerbread.org.uk)  
 Telephone: 01333 303124

### How to complain

We hope that Rhona Cunningham CEO 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/concerns/](http://www.ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

## Schedule relating to the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<b>Your name, contact details (i.e. address, home and mobile phone numbers, e-mail address)</b>	<ul style="list-style-type: none"> <li>From you</li> <li>From a referrer who you have agreed can refer</li> </ul>	<ul style="list-style-type: none"> <li>To enter into an agreement with you to provide you with our services/support</li> <li>•Legitimate interest: to maintain contact with you in order to support you</li> <li>To comply with our legal obligations</li> <li>Membership Organisation</li> </ul>	<ul style="list-style-type: none"> <li>To provide you with the necessary support/service which you have sought</li> <li>Information may be shared with third party agencies as agreed with you before contacting</li> <li>Keep all members informed about what opportunities possibilities for them.</li> </ul>
<b>Your children's names, addresses, date of birth and where they go to school/nursery/further education.</b>	<ul style="list-style-type: none"> <li>From you</li> <li>From a referrer who you have agreed can refer</li> </ul>	<ul style="list-style-type: none"> <li>To enter into an agreement with you and your children to provide you all with our services/support</li> <li>•Legitimate interest: to maintain contact with you and your children in order to support you</li> <li>To comply with our legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>To provide your family with the necessary support/service which you have sought</li> <li>Information may be shared with third party agencies as agreed with you to support your children's needs</li> </ul>
<b>Action Plan</b>	<ul style="list-style-type: none"> <li>Outcome Star</li> </ul>	<ul style="list-style-type: none"> <li>We work in partnership with you to explore you and your family's needs from the service.</li> </ul>	<ul style="list-style-type: none"> <li>To create a plan of work with agreed actions</li> <li>To review you and your family's support needs.</li> </ul>
<b>Outcomes (anonysised)</b>	<ul style="list-style-type: none"> <li>Observations of the difference in you and your family</li> <li>Feedback from you</li> </ul>	<ul style="list-style-type: none"> <li>To inform funders that we have met our contractual obligations</li> <li>Reports to our charity Board, OSCR and annual report.</li> </ul>	<ul style="list-style-type: none"> <li>Reports</li> <li>Returns</li> </ul>

<b>Case Notes</b>	<ul style="list-style-type: none"> <li>• Face to face</li> <li>• Telephone calls</li> <li>• Texts</li> <li>• Social Media</li> <li>• Meetings</li> <li>• Letters &amp; Communication</li> </ul>	<ul style="list-style-type: none"> <li>• To keep a record of the interactions between you and the worker</li> <li>• To support the working agreement between you and the worker</li> <li>• To inform future work with you and your family</li> <li>• Records of interactions</li> </ul>	<ul style="list-style-type: none"> <li>• Inform the support needed</li> <li>• Record verbal consent to refer to other services to fulfil our contractual obligations to you.</li> <li>• Supporting information of the work</li> </ul>
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As well as having a lawful basis for processing, we will not handle any sensitive personal information (special categories) and information relating to unspent criminal convictions without first obtaining the appropriate explicit consent from you.