

**Families First Privacy Notice for Service Users, Members, Former Volunteers & Funders****1. Introduction**

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

**2. Who collects and uses the information?**

- 2.1 Families First is a 'data controller' and gathers and uses certain information about you.
- 2.2 Where Families First is also a 'data processor', we will process information received from third parties about you.
- 2.3 Families First is a Company Limited by Guarantee registered in Scotland under Company No. 225041 and is a Registered Scottish Charity No. SC032506.
- 2.4 The Registered address is: Rose Lane Centre, 132 South Street, St Andrews, Fife KY16 9EW.
- 2.5 The main trading address is: Rose Lane Centre, 2 Rose Lane, St Andrews, Fife KY16 9EW.

**3. What is personal information?**

- 3.1 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.
- 3.2 This would include obvious information such as - your name and contact details, but could also include less obvious information such as - identification numbers, electronic location data, and other online identifiers.
- 3.3 The personal data that we collect, process and store is set out in this Notice.

**4. Data protection principles**

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

**5. About the information we collect and hold**

- 5.1 The information we collect and hold, how and why we do so, how we use it and with whom it may be shared is set out below.

**5.2** We may also need to share some of the categories of personal information set out below with other parties, such as:

- Government and/or law enforcement agencies.
- Third party agencies.
- Our professional advisers.
- Our regulators.
- Funders.

**5.3** Information will usually be anonymised, but this may not always be possible under our child and adult protection guidelines.

**5.4** The recipient of any information will be bound by confidentiality obligations.

**5.5** We may also be required to share some anonymised information with our funders as is necessary, to comply with their funding criteria

**5.6** We may need to share information to comply with the law.

**5.7** 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, refer to our Retention of Records policy.

**5.8** We will notify you of any changes to information we collect, or to the purposes for which we collect and process it.

## **6. Where information will be held**

**6.1** Information may be held at our offices and by third-party agencies, service providers, representatives and agents.

**6.2** All paper copy confidential information is kept in locked filing cabinets in locked offices.

**6.3** All keys for locked cabinets are kept in a key safe.

**6.4** All electronic information is held on our main server which is password protected.

**6.5** We have security measures in place to seek to ensure that there is appropriate security for information we hold.

## **7. How long we keep your information**

**7.1** 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.

**7.2** Further details are set out in our Retention and Disposal of Confidential Records policy.

**7.3** Families First have a system of shredding that ensures that all paper records are destroyed by shredding at the allotted time, unless there is a legal requirement to keep them.

**7.4** Families First will destroy electronic records at the same time as paper records, unless there is a legal requirement to keep them.

**7.5** Families First still keep a very basic record of all volunteers, staff and service users who have been involved in Families First in case an enquiry is made at a later date. The information may include:

- Name.
- Date of birth.
- Main carers name.
- Address.
- Phone.
- Email.
- Dates of involvement with Families First.
- Service involved with.
- Volunteers names.
- Any safeguarding issues.
- Any incidents recorded.

## **8. Your rights**

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

- The right to be informed about the personal data we collect and use about you. The 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.
- The right to access the personal data we hold about you. This is called making a Subject Access Request (SAR) – please see our full [Data Protection Policy](#), section 13 for instructions on how to make a request.
- The right to have your personal data rectified if any of the data we hold is inaccurate or incomplete. Please contact us using the details at the bottom to find out more.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data. Please contact us using the details at the bottom to find out more.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for a particular purpose or purposes.
- 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.

**8.2** Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

**8.3** 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.

**8.4** Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

**8.5** If you have any cause for complaint about how we use your personal data, you have the right to lodge a complaint:

- Through Families First complaints procedure [here](#).
- The Information Commissioner's Office (ICO) [here](#).

**9. Keeping your personal information secure**

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

**10. Changes to what we do**

- 10.1 We regularly review and, where necessary, update our privacy information, policies, procedures and privacy notices.
- 10.2 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.
- 10.3 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.
- 10.4 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 our main office or our website [here](#).

**11. 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: [enquiries@familiesfirststandrews.org.uk](mailto:enquiries@familiesfirststandrews.org.uk), for the attention of Families First Manager.