

SAFEGUARDING THROUGH RAPID INTERVENTION (STRIVE)

CLACKMANNANSHIRE COUNCIL - PRIVACY NOTICE

STRIVE is an initiative involving multiple public sector organisations, who work together with the goal of improving the existing system of safeguarding vulnerable individuals who are on the cusp of statutory intervention. As part of this initiative, Clackmannanshire Council assists with assessing how cases may be most appropriately handled to ensure the best care for the individual.

Clackmannanshire Council have appointed a Data Protection Officer (DPO), who ensures that we comply with data protection laws. If you have any questions about this notice or how we hold or use your personal information, please contact the DPO by e-mail at dpo@clacks.gov.uk or by writing or telephone at the details below.

You can also contact us by: e-mail at customerservice@clacks.gov.uk; telephone on 01259 45000; or writing to: Clackmannanshire Council, Kilncraigs, Greenside Street, Alloa FK10 1EB.

1 Purpose of this Privacy Notice

- 1.1 We, Clackmannanshire Council, are the "controller" of the personal data we hold about you. That means we are legally responsible for how we hold and use information about you. It also means that we are required to comply with data protection laws when holding and using your personal information. This includes providing you with the details contained within this notice of how we hold and use your personal information, who we may share it with and your rights in relation to your personal information.
- 1.2 In order to assess need and deliver additional support services, we need to collect information about you and your family. This privacy notice aims to give you information on how Clackmannanshire Council collects and processes your personal information.
- 1.3 We may update this notice at any time but if we do so, we will provide an updated copy of this notice as soon as reasonably practical.
- 1.4 More information about how we use your personal information in the course of our other activities can be found on our website [here](#).

2 What rights do you have in relation to your personal information that we hold and use?

- 2.1 It is important that the personal information we hold about you is accurate and current. Please keep us informed of any changes. Under certain circumstances, the law gives you the right to:
 - (a) request a copy of your personal information and to check we are holding and using it in accordance with legal requirements.
 - (b) request correction of any incomplete or inaccurate personal information we hold about you.
 - (c) request the suspension of our use of your personal information while, for example, we check the accuracy of the personal information we hold about you.
 - (d) request erasure of your personal data where we have no other legal or similar requirement to retain it.
 - (e) To withdraw consent at any time where the legal basis for processing data is consent.

Please contact our DPO if you wish to make any of the above requests. When you make a request, we may ask you for specific information to help us confirm your identity for security reasons. You will not need to pay a fee when you make any of the above requests, but we may charge a reasonable fee or refuse to comply if your request for access is clearly unfounded or excessive.

3 What personal information do we hold and use about you?

- 3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the person's identity has been removed (anonymous data).
- 3.2 We may collect, use, store and transfer the following categories of personal data about you if you are referred to STRIVE:
- (a) personal contact details such as name, current or last known address and telephone numbers;
 - (b) date of birth;
 - (c) family members or known associates;
 - (d) history of support and contact with other agencies (e.g. Police Scotland, the Stirling and Clackmannanshire Health and Social Care Partnership (HSCP), NHS Forth Valley, and/or other third party organisations involved in STRIVE); and
 - (e) any other additional information deemed relevant by the person referring or requesting a service.
- 3.3 We may also collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We may also be required to process data relating to any criminal convictions.

4 How is Your Personal Information Collected?

- 4.1 We will obtain your personal information in different ways:
- (a) directly from you, your family members/direct associates or representatives to determine whether you should be referred to STRIVE;
 - (b) on receipt of your referral (e.g. from Police Scotland or HSCP);
 - (c) during the pre-screening exercise where the STRIVE team will ask Police Scotland or HSCP to check if they hold any relevant information on their systems;
 - (d) during the case opening process where a case notes form is completed based on information received from Police Scotland, HSCP or any other organisations;
 - (e) internally, within the Council when departments share data with one another in the context of STRIVE;
 - (f) from Police Scotland, HSCP or other organisations during STRIVE meetings as part of the discussions about your case.
- 4.2 We may also disclose information with Police Scotland, HSCP (and by extension the NHS) or other third party organisations that are part of STRIVE.

5 How Will We Use Your Personal Information?

- 5.1 We have set out below, in a table format, a description of all the ways we plan to use your personal information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 5.2 Note that we may process your personal information for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us using the details above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing
<p>Referral & Pre-Screening: Following receipt of your referral, we will collect and use personal data to complete a pre-screening exercise to check whether we hold any relevant personal data on our systems.</p>	<p>Necessary to protect the vital interests of the data subject.</p> <p>Necessary for the performance of a task carried out in the public interest.</p> <p>To comply with legal obligations under health and safety regulations</p> <p>Where special category data or criminal offence data is collected and processed, it will be necessary:</p>
<p>Screening & Case Notes Form: If required, a screening and case note form will be completed. This will contain personal data.</p>	<p>i. to protect the vital interests of the data subject where they are physically or legally incapable of giving consent;</p>
<p>STRIVE Meeting: The personal data we hold may be shared at a STRIVE meeting between the representatives of the participating organisations. This is recorded in the aforementioned screening and case notes form. If required, STRIVE representatives may record personal data in their department case notes.</p>	<p>ii. for reasons of substantial public interest;</p> <p>iii. for the purposes of preventative or occupational medicine;</p> <p>iv. for the public interest in the area of public health;</p>
<p>Third Party Organisations: The personal data we hold may be shared, where relevant, with other third party organisations (e.g. Women's Aid or Scottish Fire and Rescue Service).</p>	<p>v. for preventing or detecting unlawful acts;</p> <p>vi. for the provision of support for individuals with a particular disability or medical condition;</p> <p>vii. for the provision or counselling, advice or support;</p> <p>viii. for the safeguarding of children and of individuals at risk;</p> <p>ix. for the safeguarding of the economic well-being of certain individuals.</p>

6 Change of Purpose

- 6.1 We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with this notice, where this is required for the purposes stated in this notice or permitted by law.

7 Access to personal information

- 7.1 In order to process your personal information in accordance with the grounds stated above, the following will have access to your data:

Internal Sharing	External Sharing
STRIVE team	Police Scotland
Money Advice	Clackmannanshire & Stirling Health & Social Care Partnership
Housing department	NHS Forth Valley
Education department	other third-party organisations where relevant (e.g. Women's Aid, Scottish Fire and Rescue)
Social Work department	

8 Data Security

- 8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those individuals who have a business need to know.
- 8.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9 Data Retention

- 9.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements, as per our Corporate Retention Schedule. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

10 Your Right to Complain

- 10.1 If you wish to make a complaint or comment about how we have processed your personal information you can do so by writing to the Council's DPO. If you are still unhappy with how the Council have handled your complaint you have the right to make a complaint to the Information Commissioner, the UK regulator for data protection, about how we hold and use your personal information. The ICO's contact details are as follows:

Telephone: 0303 123 1113 **Website:** <https://ico.org.uk/concerns/>

- 10.2 If you would like to receive this notice in alternative format, for example, audio, large print or braille, please contact us.