



NORTHAMPTONSHIRE FIRE AND RESCUE SERVICE

Privacy Policy

SERVICE INFORMATION SYSTEM	
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Executive summary	<p>Northamptonshire Fire and Rescue Service (NFRS) is committed to protecting personal data.</p> <p>This privacy notice explains how NFRS uses information about you, and how privacy is protected.</p> <p>We aim to ensure that the processing of personal data is compliant, as specified by the General Data Protection Regulation (GDPR) and the Data Protection Bill 2017.</p>

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Job title	Service Information Manager
Date	July 2020
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1 INTRODUCTION

NFRS is committed to protecting your personal data when you use our services. This privacy notice explains how NFRS uses information about you, and how we protect your privacy.

We aim to ensure that the processing of personal data is compliant and as specified by the General Data Protection Regulation (GDPR) and the Data Protection Bill 2017.

2 WHAT INFORMATION IS COLLECTED?

To deliver our services effectively, we may need to collect and process personal data about you.

Personal data refers to any information with which a living individual can be identified. Individual identification can be by the information alone or in conjunction with other information in the possession of the 'The Authority'.

2.1 The types of personal data

Personal Information, within the context of GDPR falls into two main areas:

1. **Individual details:** including name, address, other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment and training history, family details including their relationship to you.
2. **Special categories of personal data:** including certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric or data concerning sex life or sexual orientation.

2.2 Where might we collect your personal data from?

- From you as part of your employment with NFRS
- From you when you contact NFRS
- Your family members, From previous or current employers or representatives
- Other public bodies such as the Police, East Midlands Ambulance Service (EMAS), local councils and the National Health Service (NHS)
- Other organisations such as companies who you have given permission to share your information for security or key holding purposes

2.3 The purpose why we may collect/hold your personal information

We process personal information to enable us to undertake the delivery of prevention, protection and emergency services to the communities that we serve.

Personal data can be collected particularly for firefighting and emergency services, which includes managing responses to fire, and Road Traffic Collisions (RTCs). We also maintain our own records and accounts, including the management of fire service assets.

The operation of NFRS with our primary objective of delivering our Community Risk Management Plan (CRMP) is summarised as follows and is the reason why we collect personal data as detailed below:

- Managing responses to fires
- Incidents and RTCs
- Fire Prevention, (awareness, advice and guidance)
- Fire Investigation
- Carrying out Home Safety Visits
- Checking the quality and effectiveness of our services
- Investigating any concerns or complaints about our services
- Research and planning for new services
- Emergency contact information
- Agreements you may have with NFRS

We also process personal information using vehicle and building mounted CCTV systems to monitor and collect visual images for the purpose of security and the prevention and detection of crime.

NFRS are part of the national framework and as such we are required to collate and forward statistical information to government agencies, but this data has no personal or identifiable individual data within the information provided.

3 LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We have the right to process your personal data if at least one of the following applies:

- Processing is necessary for carrying out legitimate public duties of a Fire and Rescue Service as defined in the Fire and Rescue Services Act 2004
- Explicit consent is required for carrying out incidental activities that help us in carrying out our public duty of improving, protecting and saving lives
- Processing is necessary for collaborating with public organisations such as the Police and EMAS in undertaking public safety functions
- For recruitment, employment, social security purposes or a collective agreement
- Processing is carried out by a non-profit body with a political, philosophical, religious or Trade Union aim provided:
 1. The processing relates only to members or former members (or those who have regular contact with it in connection with those purposes)
 2. There is no disclosure to a third party without consent
 3. We will ensure that all processing is compliant with the GDPR

4 HOW WE KEEP YOUR INFORMATION SECURE

We are committed to ensuring that your personal data is safe and secure.

In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information that we hold about you.

These measures are reviewed as part of our business as usual procedures and is enforced by procedures relating to the investigation of any reported data breaches.

Secure measures include:

- Secure work areas
- Information Security awareness and GDPR training for our staff
- Access controls on all buildings and systems
- Encryption of personal data
- Testing, assessing and evaluating the effectiveness of technical security controls

4.1 Who will we share your personal information with?

We may engage the services of commercial companies to store and manage your information on our behalf. Where we have these arrangements, there is always a contract, Memorandum Of Understanding (MOU) or an Information Sharing Agreement (ISA) in place to ensure that the requirements of the GDPR on handling personal data are met.

We may also share your personal information with third parties that are commissioned to train our staff or volunteers.

Sometimes, it is in line with our legal duties and in the interest of public safety to share information with other organisations such as the Police, the NHS or social services.

We may also share your personal information when there is a justifiable public safety and security reason.

Examples are:

- For the investigation, detection and prevention of crime or if we are required to do so by law
- Helping the police and relevant authorities to identify trends and issues relating to fires
- If there are serious risks to the public, our staff or other professionals
- To safeguard children or vulnerable adults

4.2 Where necessary or legally required we share information with:

- Current, past or prospective employers
- Family, associates and representatives of the person whose personal data we are processing
- Suppliers and service providers
- Coroner's office
- Healthcare and welfare organisations
- Persons making an enquiry or complaint
- Police Service
- Security organisations
- Local and central government
- Educational establishments
- Financial organisations
- Educators and examining bodies
- Trade Unions and staff associations
- Credit reference agencies
- Auditors
- Debt collection and tracing agencies

- Press and the media
- Law enforcement and prosecuting authorities
- Courts
- Landlords
- Public utilities
- Insurance companies
- Legal advisers
- Public utilities
- Insurance companies

5 INFORMATION SHARING AGREEMENT (ISA)

Clients of Adult Social Care will be asked to give their consent or otherwise to their information being provided to NFRS in order that they can be contacted by NFRS to be offered a free home safety visit.

- However, in order to safeguard those clients who have neither consented nor withheld their consent to their information being shared for this purpose, there is an agreement in place with NFRS that information on known clients may be passed over by Adult Social Care in order that these clients can be contacted by NFRS and offered a free home safety visit.
- No sensitive personal information is passed onto NFRS by Adult Social Care. This ISA aims to increase the number of clients taking up the offer of a visit, and subsequently may reduce the number of fire related injuries or deaths within the communities of Northamptonshire.
- It is the intention of NFRS to review and develop partnership arrangements with other agencies in the future and these will follow the procedures listed above for our current activities with Adult Social Care and this policy will be updated accordingly.

6 YOUR RIGHTS AND YOUR PERSONAL DATA

Subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which NFRS holds;
- The right to request that NFRS corrects any personal information if it is found to be inaccurate or out of date;
- The right to erasure of your personal data where it is no longer necessary for NFRS to retain such data;
- The right to withdraw consent to the processing of your data at any time;
- The right to request that NFRS transmit your data to another organisation where applicable.
- Where there is a dispute in relation to the accuracy or processing of your personal data, you have the right to request a restriction is placed on further processing;
- The right to object to the processing of personal data where applicable. However, as NFRS will mainly be processing data based on the performance of a statutory duty in the public interest, there are limits to this right.
- The right to lodge a complaint with the Information Commissioners Office (ICO).

6.1 How long do we keep your personal data for?

- We only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.
- To determine the appropriate retention period for personal data, we consider the nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data – and whether we can achieve those purposes through other means – and the applicable legal requirements.

7 **FURTHER PROCESSING**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

Where and whenever necessary, we will seek your prior consent to the new processing.

8 **CONTACT DETAILS**

To exercise all relevant rights, queries or complaints please in the first instance contact NFRS on 01604 797000 or email: enquires@northantsfire.gov.uk.

9 **COMPLAINTS**

Any complaints will be addressed to the Service Information Manager and could be escalated to the Chief Fire Officer.

If you do not get an appropriate response to your query/complaint you can contact the ICO at ico.org.uk, Tel: 0303 123 1113 or via email casework@ico.org.uk, <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

10 **WEBSITE**

The NFRS web presence is www.northantsfire.gov.uk and this privacy notice is applicable to the NFRS web pages and online forms.

11 **ONLINE FORMS**

NFRS uses a small number of online forms which allow members of the public to contact us without the need for emails or letters. This is currently hosted on our website by Jump Media.

As a Fire and Rescue Service one of the key forms we use relates to requesting a free home safety visit and will require personal information, including address details.

This information is kept for as long as it is needed. For as long as we keep this information we use it only for the purpose of administering home safety

visits. You may ask to have your personal details removed by contacting NFRS via the contact details within this document.

As an organisation dedicated to the safety and wellbeing of the communities of Northamptonshire, we are developing and do have in place other systems, utilising electronic forms, which will also have the same standards as above.

12 REVISION OF THIS POLICY

This Privacy Statement has been adopted and is in force from the 25 May 2018. We would ask you to read also the Privacy Statement for the Northamptonshire Commissioner Fire and Rescue Authority, our Governing Authority,

It is the intention of NFRS to review this statement on a yearly basis.

Audit trail

Listed below is a brief audit trail, detailing published versions of this policy:

Document Control			
Version	Date	Author	Status
v1.0	May 2018	AM Corporate Services	GDPR implementation
v2.0	December 2018	SIM	Updated due to governance transfer
v3.0	July 2020	SIM	Yearly update