Privacy notice 35: The KFRS website

Date completed 14/05/2025

This notice is one of a set which explain what data we collect, store and process to provide our services to customers. It also sets out the legal basis we are using for collecting the data stated.

It should be read alongside the related privacy notices listed below, all of which can be found here: https://www.kent.fire-uk.org/privacy-policy

- Privacy notice 13: Safe and Well Visits, Home Fire Safety Visits and post-incident visits
- Privacy notice 14: Firesetters team
- Privacy notice 20: Consultations, information requests, freedom of information and data subject access requests
- Privacy notice 23: Customer feedback on KFRS' services
- The overall privacy notice
- The breach process contained in the Tier 3 procedure of the Tier 2 Data Breach Policy, which sets out what we will do should any data we collect be lost or misused.

Our contact details

Kent Fire and Rescue Service The Godlands Straw Mill Hill Tovil Maidstone ME15 6XB

Email: data.protection@kent.fire-uk.org

Telephone: 01622 692121

Why we collect and use personal data

This notice covers data that is collected through the KFRS website.

Under <u>Part 2</u>, <u>Section 6 of the Fire and Rescue Services Act 2004</u>, we have a legal duty to actively promote fire safety and fire prevention strategies. The provision and use of a website is a key part of this.

Kent Fire and Rescue Service (KFRS) have a website at https://www.kent.fire-uk.org. The website is used to provide information and advice to the public including safety information, news and incidents, employment opportunities, educational resources, events, and information about the organisation such as how it is run, its policies, plans, aims and objectives.

The KFRS website is maintained by Civic Computing. Civic are the developers of the site and responsible for hosting and ongoing maintenance including patch management, security updates and firewall administration. Contracts between KFRS and Civic Computing contain appropriate data protection clauses.

The website provides a series of forms which users can complete and submit via the website to request and or access services provided by KFRS. Examples of these forms may include but are not limited to the following: contact us forms, feedback forms, invitations or requests for KFRS to visit a variety of events and organisations including schools and clubs, request for fire safety intervention (formerly known as 'firesetting') and requests for a home fire safety visit.

The purpose of the website forms is to facilitate user input. Upon submission the website dynamically creates email messages containing this information and sends them to the respective KFRS inboxes.

Please note that forms requesting a HFSV (home fire safety visit) and related to fire safety intervention (including Firesetters programme) which are received via the website are also the subject of separate Data Protection Impact Assessments in relation to the special category data which they may initiate, collect and process.

The types of personal data we collect and process

The website currently hosts a series of form templates. The number of forms hosted by the website may vary. Any new forms added will be assessed to ascertain if they contain any special category or criminal offence data. If they do, a separate DPIA (data protection impact assessment) for any such forms will be carried out. The categories of personal data that may be contained within forms (excluding those for Safe and Well and Home Fire Safety Visits) include but are not limited to the following:

- Name
- Organisation where applicable
- Email address
- Address
- Date of birth
- Service number in the case of pension enquiry
- Employment dates in the case of pension enquiry
- Message
- Availability
- Case number/reference where appropriate
- Event details including address and postcode
- Reason for requesting Kent Fire and Rescue Service attendance
- Status aged over 18 years or older or legal parent guardian or carer of a minor
- Giving of consent for use of photographs, video footage or audio featuring individual for KFRS marketing/advertising purposes
- Location of photography, video footage or audio recording
- Name, address and type of educational establishment

Forms relating to Home Fire Safety Visits and Safe and Well Visits

The data contained within the forms for Home Fire Safety visits and Safe and Well visits will pass through the website on their onward journey to the designated inbox and recipient. Notwithstanding that the data contained within these forms is not stored on or by the website it is also included below for the purposes of clarity and to provide a comprehensive list as far as possible of the categories of data contained in all forms that pass through but are not stored or retained.

Categories of personal data that are collected in relation to Home Fire Safety Visits and Safe and Well Visits as set out Privacy notice 13: 'Safe and Well' visits, 'Home Fire Safety Visits' and post-incident visits (and its accompanying DPIA) are as follows:

- Name
- Date of birth
- Sex
- Contact details such as addresses, telephone numbers and email addresses
- Health data (medical conditions/physical and cognitive impairments)
- NHS number and Swift I.D. number
- Third Party details if necessary (next of kin/friend/family/agency)
- Protected characteristics under the Equality Act 2010 (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity race, religion or belief, sex, and sexual orientation).
- Relevant characteristics of the person and their home environment, including behavioural information if disclosed.
- Any specific information customers provide to us as part of correspondence related to a Safe and Well Visit.

Our lawful reasons for collecting and processing personal data

The six lawful bases for processing personal data are set out in <u>Article 6(1) of the UK GDPR</u>. These are as follows:

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- **(b) Contract**: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **(c) Legal obligation**: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- **(e) Public task**: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **(f) Legitimate interests**: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. NB: This cannot apply if you are a public authority processing data to perform your official tasks.

The lawful basis for processing personal data is the performance of a task carried out in the public interest or in the exercise of official authority as set out in Article 6(1)(e) of the UK GDPR.

This requires a separate basis in law, which comes from the following:

Our compliance with the requirements of Part 2, Section 6 of the Fire and Rescue
 Services Act 2004, which mandates the need for fire and rescue authorities to actively
 promote fire safety and fire prevention strategies. The provision and use of a website is a
 key part of this.

The further processing of the data which takes place after it has been forwarded by the website to the designated recipient, comes under the relevant DPIAs and privacy notices, in particular numbers '13 – Safe and Well Visits, home fire safety visits and post-incident visits', '14 - Firesetters Team', '20 – Consultations, information requests, freedom of information and data subject access requests', and '23 – Customer feedback on KFRS' services'.

Special category data

Article 9 of the UK GDPR covers special category data. Special category data is personal data that needs more protection because it is sensitive. The nine types of special category data are as follows:

- personal data revealing racial or ethnic origin;
- personal data revealing political opinions;
- personal data revealing religious or philosophical beliefs;
- personal data revealing trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- data concerning health;
- data concerning a person's sex life
- data concerning a person's sexual orientation

The categories of personal data contained in the form templates does not contain special category or criminal offence data, apart from the information which may be collected for the purposes of Safe and Well and Home Fire Safety Visits and education intervention. These are covered by two separate DPIAs and privacy notices referred to earlier.

Because none of the data listed above would be collected as part of this processing, the additional responsibilities necessitated when processing Article 9 special category data (namely an Appropriate Policy Document) are not applicable to this context.

Who might we share your data with?

Data contained within the forms is shared internally with nominated KFRS recipients. Nominated recipients may be teams, sections, members or other areas of KFRS who will process the use the information contained within the forms to provide the service or information requested.

Where is the data stored?

The purpose of the website forms is to facilitate user input. Upon submission the website dynamically creates email messages containing this information and sends them to the respective KFRS inboxes. User data and input are not stored on the website at any point. KFRS (as the data controller) collects and processes a range of personal data from the forms which are submitted and forwarded internally to the appropriate team within KFRS.

How long will we hold your data for?

Upon submission the website dynamically creates email messages containing this information and sends them to the respective KFRS inboxes. Because of this, user data and input are not stored on the website at any point.

What are my data protection rights?

Under data protection law, you have the following rights:

Your right of access

You have the right to ask us for copies of your personal information. You can ask to see it by making a subject access request. Guidance for making a request is available here: https://www.kent.fire-uk.org/freedom-information-foi

Your right to rectification

You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing

You have the the right to object to the processing of your personal information in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact us at:

Email: data.protection@kent.fire-uk.org

Telephone: 01622 692121

Address:

Kent Fire and Rescue Service The Godlands Straw Mill Hill Tovil Maidstone ME15 6XB

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us using the contact information above.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk