

# Collecting and Storing Data in Frontline Services

Welcome to video one in this series of bite-size e-learning modules on good data collection, storage and use in frontline services.

To effectively help the people you work to support, you collect information or data from and about them. In this video we will think about the types of data you collect, how best to record and store such data, how you can ensure the data collected is accurate and of a consistent quality, and how you can ensure the clients you are working with feel confident and comfortable sharing often highly sensitive and personal information about themselves with you.

## **Legal rights**

The first thing to recognise when thinking about collecting, storing and using information about individuals is that those individuals have legal rights directly related to this. These rights include:

- the right to be informed (for example about where their information is being stored and how it is being used)
- the right of access (to their individual files)
- the right to rectification (should a client identify mistakes or inaccuracies in their file)
- the right to erasure or restrict processing

These legal rights underpin all good data collection, storage and usage processes and should always be at the forefront of people's minds. In this video and video two will look at what that means in practice.

More detail about individual rights can be found on the Information Commissioner's Office or ICO website and the <u>relevant page</u> is linked to in the script for this video.

### **Being Trauma Informed**

Another important consideration when collecting information or data in frontline work is that homelessness and rough sleeping are traumatic experiences and often expose people to further risk of harm. Research shows that a very high percentage of those experiencing homelessness have also experienced one or more other traumatic incidents in their lives, and many make links between their trauma and their housing situation. You can find out more about this in Homeless

Link's <u>Being Trauma Informed – A Practice Development Framework</u>, especially Step I, Trauma Awareness, which is available in the Homeless Link Knowledge Hub.

You will often need to ask those you are working with for personal or sensitive information about themselves, and with that in mind, a trauma informed approach to collecting information from clients is essential.

Being trauma informed means acknowledging and responding to trauma and resisting re-traumatisation. You can do that by;

- realising the prevalence and impact of trauma on those you are working with;
- helping them create a sense of physical and psychological safety; and,
- helping them rebuild control through empowerment and collaboration.

In practical terms, a trauma informed approach to collecting information from people looks like this;

- explaining what types of information you're collecting and why, for example to complete an assessment or write a support plan; and who it might be shared with. The people accessing your service should always be clear about what is involved and what the potential outcomes could be,
- only collecting what is necessary; do you really need to know more about someone's difficult experiences? Will it serve a purpose in getting the best possible outcome for someone? There are some legal considerations that also need to be taken into account when thinking about what information to share, and we will look at those in Video 2.
- not rushing; it's ok to leave questions till another time if answering them there and then feels too difficult for your client,
- thinking about location & where someone is comfortable disclosing personal & sensitive information, for example, if you are in a busy service your client might feel there are too many people around who might overhear, so ensure you have a meeting room available
- tone of voice when asking questions; not taking care when asking for information, or simply reducing someone's difficult experiences to administrative tasks and form filling risks retraumatising your client and damaging the sense of physical and psychological safety you are trying to help build for your client.

The more you incorporate trauma informed approaches into your work, the safer those you are working to support will feel with you handling their information, both in terms of content (e.g. trauma history), and professionalism (e.g. you are consistent and boundaried, have rules you follow, are open about any exceptions to confidentiality, and so on).

If you would like to know more about integrating trauma informed practice into your work, Homeless Link have developed a <u>Trauma Informed Care Framework</u> designed to support voluntary and community organisations (VCS) within the homelessness sector to apply trauma-informed care in practice, which you'll find in the <u>Homeless Link Knowledge Hub</u>.

#### **Collecting information**

Now, let's think about the types of information you are gathering from those you are supporting. You might just think about this in terms of 'name', 'date of birth', 'address history', 'medical history', 'substance use', and so on, but it's important to know that there are legal classifications for the information you collect.

Things like 'name', 'date of birth' and 'address' fall into the category of <u>personal</u> <u>information</u> or information from which a person can be identified. Information related to, for example, health, sexual orientation, religious or political beliefs are what's called <u>special category data</u>, in other words information that needs more protection because it is especially sensitive. To collect this type of information you need to show what is known as a <u>lawful basis</u>.

The lawful bases for collecting information include: consent, contract, legal obligation, vital interests, public task and legitimate interests. In your work, it will often be the case that you will be collecting information on the basis of consent, for example, your client has agreed to meet and be assessed by you. If this is the case it is important that you take measures to ensure that consent is informed and recorded, e.g. written rather than verbal. You may also be collecting information on the basis of public task, this applies for example if you work for a commissioned service where your work can be described as being in the public interest.

There is further protection for the <u>criminal offence data</u> of anyone you are working to support, which restricts collecting and holding information about spent or unspent criminal convictions without justification. For example, you might be justified in recording any recent criminal convictions for violent offences as part of

Homeless Link 2022. All rights reserved. Homeless Link is a charity no. 1089173 and a company no. 04313826

a risk assessment. But would a historic conviction for an offence that took place several years ago be relevant? Is there a justification for recording that information?

In a nutshell, you must think about what your justification is for collecting and storing personal, special category and criminal offence data, and only collect what is necessary to carry out your role. If you would like to read more about the types of data and the lawful bases mentioned here, follow the links in video transcripts below to easy-to-read resources from the Information Commissioners Office.

### **Storing Information**

Now let's think about storing information. When you collect information from someone experiencing homelessness, what do you do with it? Ideally, you should record it to a device right away as you're talking to your client, rather than make hand-written notes in a notebook. That way there is less opportunity for error or for misinterpreting poor handwriting. It also means that personal and sensitive information can't accidentally be left lying around for others to read, which is called a <u>data breach</u>.

Saving information directly to a device also means there will usually be a name and date and time stamp to show when information was recorded and by whom. It also helps with quality assurance, for example, completing information from drop-down menus or check box answers in online forms reduces the risk of recording inaccurate information and eliminates spelling mistakes.

You can also check understanding while the person you are supporting is with you, especially when completing free text boxes. This is particularly important in ensuring what you are recording is objective rather than subjective, in other words fact, not judgement. Where you do record your own- or third-party opinions in a client file they must be clearly marked as such.

And when you're adding information to someone's file from a third-party source, you also need to make sure you're confident of the quality. For example, medical information from a GP surgery is going to be more reliable than a day centre volunteer saying 'X told me they had Y diagnosis'. The volunteer might believe the information is accurate and be sharing it with you in all good faith, but is the quality of their information as reliable as a hospital discharge summary or GP patient summary?

Homeless Link 2022. All rights reserved. Homeless Link is a charity no. 1089173 and a company no. 04313826

It is also important that anyone you are working with is confident you are going to take good care of the information they provide about themselves. So, explain where and how their data will be stored and for how long. Many organisations store client records on data bases or in electronic files for a set number of years. Explain to your client what that means in your organisation.

You should also provide written information that includes details of how someone you're working with can view their record. This will depend on the policies of your organisation, but it could mean making a Subject Access Request, through which a current or former client can ask for a copy of all information – paper and electronic files, emails, meeting notes and so on – an organisation holds about them. It's important to think about why someone might want to make such a request, which can often be due to a lack of trust in organisations and other bodies as a result of trauma or previous poor experiences. The ability of those you're supporting to access their client file makes it doubly important that everything recorded in the file and in email conversations and so on is based on fact, not judgement or opinion.

As mentioned earlier, your clients have the right to have their records corrected if they feel it contains mistakes or unjustified opinions. They can also object to having information about them shared with particular organisations. This may change how you are able to support that client, but withholding consent is their right and must be respected. We will look at data sharing in more depth in Video 2

Part of being trauma informed is building trust with those you are supporting and answering any questions they have about where and how their information is stored. If your organisation has an information security officer, you could ask them come to a team meeting and support you and your colleagues to better understand how to collect, store and use client information safely.

### **Suggested activities**

In a team meeting, discuss:

- the different types of information or data your team or organisation collects about clients
- whether the team are familiar with your organisation's data protection policy
- whether your third-party sources of information are always reliable

Homeless Link 2022. All rights reserved. Homeless Link is a charity no. 1089173 and a company no. 04313826

- where the team collects information e.g. in meeting or assessment rooms, in a day centre, at other locations, and who chooses the location, and,
- how information is stored, e.g. in individual / shared notebooks, on workissue devices, on hard copies of assessment forms, in electronic / hard copy client files, and so on.

### **Suggested actions**

Using a flipchart or whiteboard, write down what you do well, and your areas of improvement based on the above discussion, and agree an action plan for the team.

Nominate one or more team members to ensure the action plan is followed, good practice is monitored, and data protection is covered during induction training with new starters.