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GDPR Privacy Statement
To be used when collecting personal data directly from the data subject.

Glasgow City Integration Joint Board Privacy Statement

Who we are:

Glasgow City Integration Joint Board (GCIJB) is the body that develops the strategic plan for, and then oversees the delivery of, Community Health and Social Care Services in Glasgow City. It does so by executing statutory functions delegated to it by NHS Greater Glasgow and Clyde (NHSGGC) and Glasgow City Council (GCC). It guides and directs the work of the health and social care staff who work within Glasgow City Health and Social Care Partnership (GCHSCP) via directions to the Chief Officer who leads that organisation and to the Chief Officer Finance and Resources.

GCIJB is a statutory body established under the Public Bodies (Joint Working) (Scotland) Act 2014. It is based at Commonwealth House, 32 Albion Street, Glasgow, Scotland, G1 1LH. You can contact the Data Protection Officer for GCIJB by post to City Chambers, George Square, Glasgow, Scotland, G2 1DU or by email at: dataprotection@glasgow.gov.uk and telephone on 0141 287 1055.

Why do we need your personal information and what do we do with it?

This notice is for all members of the community who may receive services from GCHSCP or give support to other persons who receive those services. It covers those who participate in research, consultations, surveys or community events relating to the work of GCIJB and its development of strategic plans. It is also for any persons who make representations directly to GCIJB, whether in the form of general enquiries, complaints or formal information requests. It is finally for voting and non-voting members of the Integration Joint Board itself, whose own details may be held either by GCIJB or on behalf of GCIJB.

GCIJB does not process a large amount of personal data and does not generally process sensitive personal information about users of community health and social care services, or any individuals other than its own Board members. Handling such personal data is generally unnecessary in order to devise strategies and monitor delivery of services. GCIJB will instead usually rely upon anonymised, aggregated or statistical data provided by the partner agencies (GCC and NHSGGC). One or both of those two statutory bodies would generally hold the individual personal data about service users from which the general data reported to GCIJB is derived.

However, there are occasions when we will process limited personal information relating to a limited number of individuals. This particularly applies to responding to representations made directly to GCIJB by members of the community we serve and also when consulting or liaising with partner organisations and individuals with whom we work to plan and deliver services. We will use this to maintain contact with strategic partners and to examine individual circumstances when appropriate to do so, directing the Chief Officer of GCHSCP and his or her staff to resolve specific issues on our behalf and to respond to enquiries and information requests submitted directly to ourselves. We will use information relating to GCIJB board members and partner organisations and individuals with whom we work in order to ensure the effective administration of the business of the IJB.

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We will also use information to verify the identity of enquirers where required, contact relevant individuals by post, email or telephone, maintain our records and to demonstrate to our own auditors and external regulators that we are providing proper services in accordance with the law.

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Legal basis for using your information:

We use the information referred to above to deliver functions described in the Glasgow City Integration scheme: <https://glasgowcity.hscp.scot/node/86> which has been developed under legal powers set out in The Public Bodies (Joint Working) (Scotland) Act 2014.

There are additionally specific statutory requirements in relation to responding to complaints, Freedom of Information requests and Subject Access Requests. The policies on these matters and their legal basis are set out on the website of GCHSCP: <https://glasgowcity.hscp.scot/>

When your personal information is processed, it is because this is necessary for the performance of tasks carried out in the public interest by GCIJB, as set out in the policies and legislation referred to above. In the case of specific enquiries requiring response, if you do not provide us with particular information we have asked for then we may not be able to provide these services to you.

We will only process more sensitive personal information about you where absolutely necessary for the purposes of the effective planning and oversight of social care health services and the management of health and social care systems as set out in the Data Protection Act 2018. As above, this will seldom be necessary, as personal information will mainly be held by the partner agencies. GCIJB would not usually ask for sensitive personal data about any identifiable individuals to be submitted directly to it.

Who do we share your information with?

As is the case for all public bodies in Scotland, we will generally comply with requests for specific information from regulatory and law enforcement bodies where this is necessary and appropriate. However the main agencies with whom GCIJB will share information are the partner agencies NHS Greater Glasgow and Clyde (NHSGGC) and Glasgow City Council (GCC). This information sharing is covered by a data sharing agreement which is publicly available: www.glasgow.gov.uk/index.aspx?articleid=20530

In particular, Glasgow City Council currently holds and processes records on behalf of GCIJB, as set out in the GCIJB Records Management Plan: [www.glasgowcity.hscp.scot/node/3014](https://glasgowcity.hscp.scot/node/3014), under the terms of a memorandum of understanding. This means that if you do submit enquiries or information requests directly to GCIJB, or work with GCIJB in respect of consultations and development of strategic plans, then your contact details and any other relevant information will be held on GCC information systems on behalf of GCIJB. This Records Management Plan has been approved in terms of the Public Records (Scotland) Act 2011.

This data sharing will be done in accordance with the terms of this privacy statement and the specific terms set out in the Data Sharing Agreement and Records Management Plan referred to above.

International transfers:

We do not anticipate any need to transfer your personal data outwith the U.K. We will advise you if any such need arises and explain the reasons to you or your legal representative.

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How long do we keep your information for?

We only keep your personal information for the minimum period amount of time necessary. Sometimes this time period is set out in the law, but in most cases it is based on the business need. Because of the special arrangement for records management between GCIJB and GCC, the records retention and disposal schedule for GCIJB records is part of the retention schedule of GCC. This sets out how long that body holds different types of information, including the information it holds on our behalf. You can view this on their website at www.glasgow.gov.uk/rrds or you can request a hard copy from the contact address stated above.

Your rights under data protection law:

- **access to your information** – you have the right to request a copy of the personal information that we hold about you.
- **correcting your information** – we want to make sure that your personal information is accurate, complete and up to date. Therefore you may ask us to correct any personal information about you that you believe does not meet these standards.
- **Deletion of your information** – you have the right to ask us to delete personal information about you where:
 - I. you think that we no longer need to hold the information for the purposes for which it was originally obtained
 - II. you have a genuine objection to our use of your personal information – see *Objecting to how we may use your information* below
 - III. our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to tell us to stop using your personal information for direct marketing purposes.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply if we no longer have a basis for using your personal information but you don't want us to delete the data.

Where this right applies it will mean that we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Please contact us as stated above if you wish to exercise any of these rights.

Information you have given us about other people:

If you have provided anyone else's details to us, please make sure that you have told them that you have given their information to Glasgow City Integration Joint Board. We will only use this information as part of the handling of your enquiry or execution of duties referred to above. If they want any more information on how we will use their information they can visit our web site at <https://glasgowcity.hscp.scot/> or email dataprotection@glasgow.gov.uk.

Complaints:

We aim to directly resolve all complaints about how we handle personal information. If your complaint is about how we have handled your personal information, you can contact GCIJB's

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Data Protection Officer by email at dataprotection@glasgow.gov.uk or by telephone on 0141 287 1055.

However, you also have the right to lodge a complaint about data protection matters with the Information Commissioner's Office, who can be contacted by post at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. By phone on 0303 123 1113 (local rate) or 01625 545 745. Visit their website for more information at- <https://ico.org.uk/concerns>

If your complaint is not about a data protection matter you can find details on how to make a complaint about GCIJB on our website at: [www.glasgowcity.hscp.scot/sites/default/files/publications/Glasgow City IJB Complaints Handling Procedure.pdf](http://www.glasgowcity.hscp.scot/sites/default/files/publications/Glasgow%20City%20IJB%20Complaints%20Handling%20Procedure.pdf)

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