



**EUROPE & SCOTLAND**  
European Social Fund  
Investing in a Smart, Sustainable and Inclusive Future

## **Privacy Notice for Money Skills Argyll**

Money Skills Argyll is a partnership of Argyll and Bute Council, Allenergy, Bute Advice Centre, HELP, Carr Gomm, Argyll Community Housing Association, Argyll Networks and Argyll and Bute Citizens Advice Bureau and will be referred to throughout this document as 'the partnership'

The partnership respects your personal information and undertakes to comply with the Data Protection Act 2018 and other relevant legislation. Any queries regarding the processing of your personal data should be made to the relevant Data Protection Lead for your registering agency as listed above and for Argyll and Bute Council Iain Jackson, [iain.jackson@argyll-bute.gov.uk](mailto:iain.jackson@argyll-bute.gov.uk) or 01546 604 188.

For Argyll and Bute Council data protection issues you should raise any concerns in the first instance with [moneyskillsargyll@argyll-bute.gov.uk](mailto:moneyskillsargyll@argyll-bute.gov.uk). In addition to this a copy of the Council's Data Protection Policy can be requested by email to [data.protection@argyll-bute.gov.uk](mailto:data.protection@argyll-bute.gov.uk)

Each agency within the partnership and the Scottish Government are respectively acting as Data Controllers when collecting the information set out below.

### **What Information is collected?**

For the purposes of this specific service, the personal data the partnership, on behalf of the Scottish Government, may collect and process and which you will be required to provide evidence of are the following:

- Household status
- Title, name, address evidenced by utility bill, bank statement, NHS medical card, other documentation from statutory body
- Date of birth including birth/adoption certificate evidenced by driving license/passport/national identify card/ other documentation from statutory body
- Telephone number and email address
- Social media contact details (messenger, whats app, snapchat)
- Place of birth
- Citizenship status
- Nationality
- National Insurance Number and Right to Live in the UK
- Initial employment status
- Benefit Award Letters
- Income Calculator
- Level of Education

We will also collect and process sensitive information (also referred to as special category data) that includes

- disability / health status
- gender
- ethnic group

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If you do not provide this information then the partnership will be unable to provide a service via Money Skills Argyll.

In addition to this the personal data partners may collect and process is the following;

- Financial Gain, i.e. any successful benefit awards they assist you to receive

### **Purpose - why we need this information?**

The data will be used to support your progression towards Improved Money Management Skills, Decrease in Debt as a Barrier to Social Inclusion and other positive outcomes. Your information is being collected about you to ensure:

- that you are eligible to receive support from Structural Funds; the European Union's main way of investing in 'smart, sustainable and inclusive' growth in its member states;
- that we can fulfil our legal obligations to the European Commission regarding how the Structural Funds are used in Scotland;
- and to verify your identity;

and as such will be used for the following purposes:-

- to avoid the unnecessary need for you to complete another registration form each time you receive assistance from a different support provider
- to allow the partnership to monitor the success and performance of services offered and to undertake evaluations
- to contact you for feedback regarding the quality of services provided to you
- to monitor compliance with equal opportunities legislation

If you provide inaccurate information, deliberately or without due care, the partner agent will advise the client of the possible consequences and either assist to rectify the situation or cease working with them.

The information is collected as Money Skills Argyll is joint funded by European Social Fund and BIG Lottery Fund. The information assists the Scottish Government to meet the legal obligations placed on them by the European Commission and ensures that Structural Funds are spent correctly in Scotland and on the right things.

### **How your information will be used**

The Scottish Government will:-

- only process your information in relation to administering Structural Funds;
- store your information on secure IT and Data Storage systems and only for as long as it is legally required and still liable to external audit after which it will be securely destroyed;
- ensure that your individual data details will not be transferred outside of the UK;
- ensure that all performance reporting on the Structural Funds will not identify individual beneficiaries but will be provided on an aggregated basis;
- ensure that your data will only be shared with those organisations such as the European Commission as the Scottish Government are required to share with to meet Structural Funds Regulations.

In addition to the above the partnership will:-

- only use anonymised information to inform statistical reports
- only use anonymised information to assist with future funding bids

## **Who your information will be shared with**

In order to provide you a service your information may be shared with the representatives of the partnership and their funders:-

- Argyll and Bute Council, Allenergy, Bute Advice Centre, HELP, Carr Gomm, Argyll Community Housing Association and Argyll Networks, Argyll and Bute Citizens Advice Bureau
- Funders, administrators and auditors of public funds including European Structural Funds e.g. The Scottish Government, Audit Scotland and the European Court of Auditors
- HANLON Software Solutions, Kitework Accellion Software Company, European Union Management Information System (EUMIS) and the electronic Records & Document Management solution (eRDM) data storage system on behalf of the partnership, to process the information in order to maintain a case management system
- We may also share you information with law enforcement agencies for the prevention and detection of crime

It may be necessary for our Funders, administrators and auditors of public funds including European Structural Funds e.g. the Scottish Government, Audit Scotland and the European court of Auditors to look at cases to ensure that we are working to standards which you are satisfied with.

When you do not provide information directly to us, we may receive it from other relevant organisations relevant to this service e.g. other Council services, NHS Boards, GPs, Local Authorities, Police Authorities, and DWP.

All of the information we collect from you will be processed by staff in the United Kingdom. You should also be aware that your data will be stored on servers located within the United Kingdom and the data will not be processed outside the European Union. We will take all reasonable steps to ensure that your data is kept securely. More information on how we do this can be requested from the Data Protection Officer within your registering agency.

## **What other purposes would we like to use your information for?**

If you agree to participate a case study we will also use your details to contact you complete the necessary paperwork, you will complete a separate mandate should you agree to this.

## **Legal Basis for using your information**

Processing your personal information is necessary for the performance of a task carried out in the public interest by the Council and to enable the Scottish Government to exercise the official authority vested in them as Member State. Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller.

As you have provided special category data in relation to Money Skills Argyll, our lawful basis for processing this data is:

- for reasons of substantial public interest for aims that are proportionate and which contain appropriate safeguarding measures

## **How long we will keep your information**

For this specific project the partnership will only keep your information for as long as it is legally required, which is currently until 2025. After this period it will be destroyed under secure arrangements if it is no

longer required for the lawful purpose(s) for which it was obtained. Your information will be collected electronically and on Money Skills Argyll Paperwork.

More information on Argyll and Bute Council retention policy and procedure can be obtained by emailing [moneyskillsargyll@argyll-bute.gov.uk](mailto:moneyskillsargyll@argyll-bute.gov.uk) if required. You can contact any partner listed above to request a copy of their retention policy.

## **Your Rights**

When you provide information to the partnership, you have the right to request information about how your personal data is processed and to request a copy of that personal data.

You have the right to request that any inaccuracies in your personal data are rectified without delay and you can edit your contact details at any time. This should be done in the first instance by contacting the organisation providing you with support.

You will have the following rights:

- to withdraw consent at any time, where the lawful basis specified above is consent
- to lodge a complaint with the Information Commissioner's Office – see below for details
- to request access to your personal data – please contact the Data Protection Officer if you wish to submit a request.
- to data portability, where the Legal basis specified above is i) consent or ii) performance of a contract
- to request rectification or erasure of your personal data, as far as the legislation permits – please contact the Data Protection Officer and provide details of what data you wish to be rectified or erased.

You can find out more about your rights in relation to data protection here: [www.argyll-bute.gov.uk/data-protection](http://www.argyll-bute.gov.uk/data-protection) or emailing [data.protection@argyll-bute.gov.uk](mailto:data.protection@argyll-bute.gov.uk)

## **Complaints**

Complaints can be logged with any partner listed above, verbally or in writing. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

## **Information Commissioner's Office**

If you consider that your personal data has been misused or mishandled, you may make a complaint to the Information Commissioner, who is an independent regulator. The Information Commissioner in Scotland can be contacted at:

45 Melville Street Edinburgh EH3 7HL  
0303 123 1113  
[casework@ico.org.uk](mailto:casework@ico.org.uk)

Any complaint to the Information Commissioner is without prejudice to your right to seek redress through the courts.

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The ICO is the UK's independent body set up to uphold information rights.  
Information Commissioner's Office  
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Telephone: 0303 123 1113 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

The Information Commissioner's Office – Scotland  
45 Melville Street, Edinburgh, EH3 7HL Telephone: 0303 123 1115 Email: [Scotland@ico.org.uk](mailto:Scotland@ico.org.uk)