Shetland Islands Council

Free Period Products Scheme – Online/Postal Orders
Data Protection Privacy Statement

Who we are?

Shetland Islands Council is a local authority established under the Local Government etc. (Scotland) Act 1994. Its office headquarters is located at 8 North Ness Business Park, Lerwick, Shetland, ZE1 0LZ, United Kingdom.

You can contact our Data Protection Officer by post at this address, by e-mail at: dataprotection@shetland.gov.uk and by telephone on (01595) 744 550.

The Data Protection Officer for Shetland Islands Council is the Executive Manager – Governance and Law.

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

Shetland Islands Council has a statutory duty to provide period products free of charge to anyone who needs to use them. As part of our statutory duty, the Council has entered a contract with Grace and Green to enable you to order products via an online order form and have free period products delivered to your home address, and for approved community stockists to have free period products delivered to their venue.

Grace and Green and Shetland Islands Council need your personal data to be able to process your request for free period products.

We also use your information to verify your identity where required, contact you by post, email or telephone and to maintain our records.

Legal basis for using your information

We provide these services to you as part of our statutory function as your local authority. You can find more details of our role on our website.

Processing your personal information is necessary for the performance of a task carried out in the public interest by the Council.

If you do not provide us with the information we or Grace and Green have asked for then we will not be able to provide this service to you.

Shetland Islands Council has a responsibility under the Period Products (Free Provision) (Scotland) Act 2021 to make period products obtainable free of charge for anyone who needs to use them.

What personal data we hold, and how we obtain it?

The types of personal data we and Grace and Green hold and process about you can include:

- Name
- Contact details, such as address, e-mail address (or phone number if you do not have an email)

- Type and quantity of period products ordered
- Information about your eligibility route for the service (for example, whether you are a member of the community, a student, or home educated)

All personal data is held within a secure information management system.

Who do we share your information with?

We are legally obliged to safeguard public funds so we may be required to verify and check your details internally for fraud prevention. We may share this information with other public bodes (and also receive information from these other bodies) for fraud checking purposes.

We are also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this. We will also generally comply with request for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate.

Your information is also analysed internally and externally to help us improve our services and to comply with legislation. We provide an internal audit service because the law states we must do so. The law also states we must be audited externally. The external auditors are appointed by Audit Scotland. Our internal audit team and the external auditors may process any personal information held within the Council for its contractors and partners) in order to assess and provide assurances on the arrangements for governance, risk management and internal control within the service area. External audit will also ensure that the financial position stated in the annual accounts give a true and fair view in accordance with the law and codes of practice.

You will provide your personal information with our chosen supplier Grace and Green, to enable them to supply free period products to you on our behalf. Grace and Green will share personal and order information with Shetland Islands Council to ensure they are meeting the terms of our contract to supply free period products to Shetland residents. Information on Grace and Green's Privacy Policy is available here.

Will we send your information out with the UK?

We do not transfer your information out with the UK. If it becomes necessary to do so, we would ensure that the appropriate safeguards are in place.

How long do we keep your information for?

We only keep your personal information for the minimum 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. We maintain a records retention and disposal schedule which sets out how long we hold different types of information for. You can view this on our website at http://www.shetland.gov.uk/information-rights/DataProtection.asp or you can request a hard copy from the address 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:

- you think that we no longer need to hold the information for the purposes for which it was originally obtained
- we are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below.
- you have a genuine objection to our use of your personal information – see *Objecting to how we may use your information* below
- 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, for example, where we are checking the accuracy of personal information that we hold about you or we are assessing the objection you have made to our use of your information.

This right might also 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 is realistically applied 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.

Withdrawing consent to use your information

Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

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 the Council, please make sure that you have told them that you have given their information to Shetland Islands Council. We will only use this information for a specific purpose, e.g. to contact those people in the event of an emergency, to assess your own entitlement to a service or to contact them in order to take up references in the event that you are successful in your job application.

If they want any more information on how we will use their information they can visit our website at http://www.shetland.gov.uk/information-rights/DataProtection.asp
or email dataprotection@shetland.gov.uk.

Profiling or automated decision-making processes

There are no profiling or automated decision-making processes being undertaken.

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 the Council's Data Protection Officer by E-mail at dataprotection@shetland.gov.uk or by Phone on (01595) 744 550.

However, you also have the right to lodge a complaint with the Information Commission's Office, who can be contacted by post at:

Information Commission's Office
4th Floor, No.3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Phone: 0303 123 1113 (local rate).

Visit their website for more information at- https://ico.org.uk/concerns

Please note if your complaint is not about a data protection matter or does not concern the handling of personal information, please contact us using the Council's Complaints Handling Procedure.