



Granton Information Centre Privacy Statement

Granton Information Centre (GIC), established in 1984, provides free, impartial and confidential advice, information and representation to our clients.

Our staff are trained to assist in welfare benefits, debt/money advice and housing advice.

Each staff member at GIC has a confidentiality agreement in place. We do not disclose information about our clients, their circumstances or the nature of their enquiries outside GIC unless the client has given prior consent or there is another lawful basis for doing so. We will not confirm whether an individual is, or has been, a client of GIC to anyone outside the organisation unless disclosure is authorised or legally permitted.

Please take the time to read our privacy statement. As an organisation that deals with sensitive information daily, GIC believes it is important for clients to understand how their personal information is used and what rights they have.

More information about data protection and individual rights is available from the Information Commissioner's Office: <https://ico.org.uk/for-the-public/>

Who is responsible for your information

GIC is the data controller responsible for the personal information described in this statement.

Granton Information Centre, 134–138 West Granton Road, Edinburgh, EH5 1PE

Email: info@gic.org.uk

The Office and Administration Manager is responsible for data-protection enquiries at GIC.

Why GIC records client data

We collect and use our clients' personal information to enable us to provide them with tailored advice, information and representation. As an advice agency, we have a "legitimate interest" to do this under data-protection law because we need to collect and use data in order to provide the service.

What client data we collect

GIC only collects the information we require. Clients should decide what they feel is appropriate to disclose to us. Our staff will explain throughout our dealings with clients why we need the information we collect.

When we record and use client personal information, our staff:

- only access it when they have a good reason;
- only share information that is necessary and relevant and, wherever appropriate, discuss this with clients before doing so; and
- never sell client information. We may use approved service providers, such as secure IT and case-management providers, who process information on our behalf under appropriate contractual, confidentiality and data-protection requirements.

The following personal data is considered "special category data". To enable GIC to record this information, we require clients to sign a GIC authorisation form giving explicit consent:

- personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs;
- trade-union membership;
- genetic data or biometric data processed solely to identify a person;
- health-related data; and
- data concerning a person's sex life or sexual orientation.

Who we may share client information with

Where it is necessary, relevant and lawful, GIC may share limited client information with relevant organisations, such as:

- courts or tribunals, where this is required to support representation,

- referral partners, where a client has agreed to a referral or another lawful basis permits the sharing; and
- Statutory Benefit Providers – Where GIC is acting on a client's behalf, we may share relevant personal information with organisations responsible for administering welfare benefits and financial support. These may include the Department for Work and Pensions (DWP), the City of Edinburgh Council and Social Security Scotland. We will only share information that is necessary to advise or represent the client, manage or progress their claim, provide supporting evidence, make enquiries or representations, or resolve issues concerning their entitlement. Information will be shared where the client has authorised GIC to act on their behalf or where another lawful basis applies.

How we store client data

Clients may receive advice from GIC through a face-to-face appointment, telephone or video call, email or letter. In all of these circumstances, our staff will log relevant client information, correspondence and notes surrounding the case or enquiry in our secure case-management system, AdvicePro. At present, we do not record telephone or video calls.

Some client information may also be kept within our secure email and IT systems.

We have security measures in place to protect personal data against loss, misuse, alteration, unauthorised access or disclosure. Although no system can eliminate every risk, we take appropriate organisational and technical measures to protect the information under our control.

When we close a case, we will try to return any original documents to the client. Where this is not possible, they will be securely destroyed. In line with the UK GDPR and GIC's retention arrangements, electronic client information and copies of documents will normally be retained for a maximum of six years after the case closes. Information may be retained for a different period where required by law or justified by the circumstances.

When an individual visits our website, www.gic.org.uk, cookies may be used. Further information is available in the GIC Website Cookie Policy, which can be downloaded from our website.

When we use client information without permission

On rare occasions, GIC may have to use or share client information without prior consent. We will only do this where there is a lawful basis. Examples may include:

- a legal obligation, such as where the police or a court asks us to share information;
- protecting someone's life, known as "vital interests", such as sharing relevant information with a paramedic if a client becomes unwell at our office;
- carrying out GIC's legitimate interests, such as producing genuinely anonymised statistics or case studies for funders or research; or
- establishing, exercising or defending GIC's legal rights, such as responding to a complaint about advice provided by GIC.

Your data-protection rights

If you have questions about how your information is collected or used, or wish to exercise a data-protection right, please email info@gic.org.uk. We aim to acknowledge requests within ten working days and will respond without undue delay and within the applicable statutory time limit.

Where we rely on consent, clients have the right to withdraw their consent at any time. Where GIC relies on legitimate interests, clients have the right to object to the use of their personal information. GIC will consider each objection in accordance with data-protection law.

You can contact us to:

- find out what personal information we hold about you and ask us to correct information that is wrong, out of date or incomplete;
- request that we delete or stop using your information, where the relevant right applies; or
- ask us to provide a copy of information we hold in a format that can be transferred to another service, where the right to data portability applies.

How to complain

If you are concerned about how GIC has collected, used or shared your personal information, please contact the Executive Manager at info@gic.org.uk so that we can look into the matter.

You also have the right to complain to the Information Commissioner's Office (ICO). Information about making a complaint is available at <https://ico.org.uk/make-a-complaint/>.