

Customer comments, compliments and complaints Privacy Notice

Data Controller

Inverclyde Council is the Data Controller. Inverclyde Council is a local authority established under the Local Government etc. (Scotland) Act 1994. Our head office is located at Municipal Buildings, Clyde Square, Greenock, PA15 1LY.

Data Protection Officer

If you would like to contact our Data Protection Officer about a data protection matter, please contact the Information Governance Team using the contact details for the Council set out above or by email at dataprotection@inverclyde.gov.uk.

What information do we need?

Unless specifically agreed with you, we will only collect personal data about you which does not include any special categories of personal information about you in providing the Council with the detail of the complaint which you wish to raise.

The information will however include details such as:

Name;
Address;
Telephone Numbers; and
Email Address.

Why we need this information?

You are giving the Council your personal information to allow us to respond to your comment, compliment or complaint. We will have a record of your comment, compliment or complaint within the Council's systems to enable the relevant Service(s) to undertake the actions required and follow the appropriate procedures.

Your personal data will be used to record your complaint into the complaint handling system. The Council needs to process your personal information if you choose to escalate your complaint to the Scottish Public Services Ombudsman. We also use your information to verify your identity where required, contact you by post, email or telephone and to maintain our records. If you do not provide this information then we will be unable to respond to your complaint although we can investigate the matter anonymously and take appropriate steps to address any matter that the investigation highlights requires further action.

We will not collect any personal data from you that aren't needed for delivery of those services.

The Legal basis for using your information

The Council provides these services to you as part of the Council's statutory function as your local authority. You can find more details of the Council's role on our website and for Customer Comments, Compliments and Complaints on the contact us section.

Data Protection legislation sets out when we are lawfully allowed to process your personal data. The lawful basis we are relying on for this processing is Article 6(1)(e) of the UK GDPR which states that processing is necessary for compliance with our legal obligations, including, under the Public Services Reform (Scotland) Act 2010 in relation to complaints.

What we will do with your information?

All of the information we collect from you will be processed by staff in the United Kingdom.

The Council is legally obliged to safeguard public funds so the Council is required to verify and check your details internally for fraud prevention. The Council may share this information with other public bodies (and also receive information from these other bodies) for fraud checking purposes. The Council is also legally obliged to share certain data with other public bodies, such as HMRC and will do so where the law requires this.

The Council will also generally comply with requests for specific information from other regulatory and law enforcement bodies where this is necessary and appropriate. The Council analyse your information internally to help us improve Council services. This data sharing is in our full privacy notice which is on the Council website. It also forms part of the Council requirements in line with our Records Management Plan approved in terms of the Public Records (Scotland) Act 2011.

When you tell or send us a comment, compliment or complaint it will be received by the Council's Customer Services Centre. A record of your comment, compliment or complaint will be stored in our systems. The Customer Service Centre will review and pass the correspondence onto the appropriate Service to review, take action where appropriate or to investigate your complaint and provide you with a response. If your complaint involves more than one Service, your personal information will be provided to the relevant Service(s) to investigate your complaint using the complaint handling procedure.

The Council may contact you by telephone or write to you to update you on the concerns that you raised in your comment or complaint. The Council will provide you

with the outcome of investigation findings and following the Council's complaint handling procedure which can be found on the Council's website.

The Council may use your information to contact you following the resolution of your complaint to complete a customer satisfaction survey. This is to assist the Council improve its complaint handling and for service improvement and to comply with reporting requirements to the Scottish Public Services Ombudsman. The Council will also use your information for quality assurance of the Council's complaint handling to ensure we meet our obligations set out in the Council's complaint handling procedure.

In general the Council does not transfer personal data outside either the UK or the European Union and on the rare occasions when it does so the Council will inform you. The Council will only transfer data outside the UK and the EU when it is satisfied that the party which will handle the data and the country it is processing it in will provide adequate safeguards for personal privacy.

How long will we keep your information?

The Council maintains a Policy for the Retention and Disposal of Documents and Records Paper and Electronic which sets out how long we hold different types of information for. This is available on the Council's website at within the freedom of information pages or you can request a hard copy from the contact address previously stated above.

Your Rights

Your personal data belongs to you and you have the right to:

- be informed of how we will process it;
- request a copy of what we hold about you;
- have it amended if it's incorrect or incomplete;
- have it deleted (where we do not have a legal requirement to retain it);
- withdraw your consent if you no longer wish us to process;
- restrict how we process it;
- object to us using it for marketing or research purposes;
- object to us using it in relation to a legal task or in the exercise of an official authority;
- request that a person reviews an automated decision where it has an adverse effect on you.

Complaints

In addition, if you are unhappy with the way the Council have processed your personal data you have the right to complain to the UK Information Commissioner who can be contacted as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

Phone: 0303 123 1113 or visit: the Information Commissioner's Office website but you should raise the issue with the Council's Data Protection Officer first.

Automated Decision Making

We will not use your data for any automated decision making.

More information

For more details on how the Council processes your personal information visit the Council's website and see the [privacy notice pages](#). If you do not have access to the internet you can contact the Council via telephone to request hard copies of our documents.