

Privacy Policy and Statement

We take seriously the privacy of visitors to our websites (<http://www.spfo.org.uk/> and/or <https://www.axisespfo.org.uk/altairMSSWeb/login>) and the security of their personal information. This policy and statement (together with our Terms and Conditions and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Our [Terms and Conditions](#) set out the provisions for use of our websites, either as a guest or registered user.

By using our websites, and contacting us via our websites, you agree to the terms of this privacy policy. Please read this privacy policy carefully as it explains how personally identifiable information is collected and used by us.

The information provided on this website is believed to be accurate at the time of writing but we accept no liability for the contents and anyone relying on these contents does so at their own risk. Nothing on this website is to be construed as binding us or constituting an offer on our behalf.

Privacy Policy

Our websites are operated and controlled by Glasgow City Council, a local authority incorporated under the Local Government etc. (Scotland) Act 1994 and having its chief office at City Chambers, George Square, Glasgow G2 1DU, United Kingdom, acting as administering authority for Strathclyde Pension Fund.

In terms of the Data Protection Act 1998, Glasgow City Council (referred to in this privacy policy as "we" or "us") is the data controller of personal data (information relating to identifiable living individuals) collected or obtained by or through our websites. Glasgow City Council is registered under the Data Protection Act 1998 and as a data controller (notification number Z4871657); the register entry can be inspected on the [website of the Information Commissioner's Office](#).

Any personal data collected through our websites will be treated as confidential under the principles of the Data Protection Act 1998.

Our websites do not automatically capture or store personal information, other than logging the user's IP address and session info such as the duration of the visit and the type of browser used. This is recognised by the webserver and is only used for system administration and to provide statistics which we use to evaluate use of the sites.

You will be asked to provide some personal information if you wish to register with our websites and take advantage of the additional features that registered users can access. This information will be restricted to details which may help us provide better services to you through our websites. Our registration process for SPFOOnline will ask for your surname, National Insurance number, date of birth and e-mail address. By providing this information you consent to us using these details to help provide you with services or answers to queries, as appropriate.

You agree to us using your details in this way by completing the registration process. Similarly, if you wish to contact us through our websites you may be asked to provide some limited personal information to enable us to respond to your question or comment. Comments may be submitted without providing personal details - we will not, however, be able to respond to you unless you provide a means of contact. You do not need to provide us with personal information simply to browse the sites.

We do not sell or rent your personal information to third parties. We may make information available to tax and law enforcement authorities in particular cases, as required or permitted by law.

This privacy policy only covers our websites at www.spfo.org.uk and <https://www.axisespfo.org.uk/altairMSSWeb/login>. Links within these sites to other websites are not covered by this policy and individuals should check the terms of the privacy policy of those other sites for their terms. We are not responsible for the content of external websites.

Any changes to this Privacy Policy will be posted on our websites.

How we protect your information

We store your personal data securely. We have in place security policies which are intended to ensure, as far as possible, the security and integrity of all personally identifiable information.

Your data will be stored securely within Strathclyde Pension Fund's IT provider, Heywood Limited Aquila House 35 London Road, Redhill, Surrey RH1 1NJ, and on sites hosted on Glasgow City Council's corporate network.

Where we have given you (or where you have chosen) an email username, password or activation key which enables you to access certain parts of our sites, you are responsible for keeping this information confidential. We ask you not to share this information with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

An important note to visitors who are under the age of 16 years old

Information available on these websites is available to all visitors, but we ask that persons under the age of 16 do not submit any personal information to us. If you are under 16 years old please only provide information in conjunction with, and under the supervision of, a parent or guardian.

Cookies

Our websites uses cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our sites. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

Agents and service providers

We employ other companies and individuals to perform functions on our behalf. They may need access to your personal information in order to perform their functions.

External websites

Our sites include links to external websites which are not the responsibility of SPFO and are not covered by this privacy policy and we do not accept any responsibility or liability for these policies. Be sure to check the privacy policy of these sites if you are asked to provide information.

Access and corrections

Under the Data Protection Act 1998, you have a right to request a copy of information which we hold about you. You also have a right to require any inaccuracies in your information to be corrected.

You can ask us for a copy of any personal data or to modify your personal details by contacting us. Please state clearly your name, address and/or email address and/or telephone number.

Comments or questions

Please send comments, questions or requests regarding this privacy policy or personal data held by us to the address below:

Strathclyde Pension Fund Office

P.O. Box 27001

Glasgow

G2 9EW

spfo@glasgow.gov.uk

Privacy Statement


This page tells you how Glasgow City Council, acting as administering authority for Strathclyde Pension Fund uses your personal information. It was last updated in April 2016.

The Short Version:

This is the privacy notice for Glasgow City Council, acting as administering authority for Strathclyde Pension Fund. We will use your details to provide you with the service which you or someone else have asked us to provide. We will also use your personal details for purposes of crime prevention and crime detection and will share it with other public bodies for that purpose.

The Longer Version

The organisation which is using your personal details is Glasgow City Council, a local authority established under the Local Government etc (Scotland) Act 1994 and having its head office at City Chambers, George Square, Glasgow G2 1DU, acting as administering authority for Strathclyde Pension Fund ("we" or "us"). We are the data controller of this personal data for purposes of the Data Protection Act 1998 and are registered as a data controller with the Information Commissioner under Notification No. Z4871657.

We have an approved  [Information Use and Privacy Policy \[37kb\]](#) which sets out the high level principles we operate to in using people's personal data. This privacy statement describes how we presently translate those principles into practice in terms of what we will and will not do with the information we hold. It sets out the general approach we take, in each case with additional information relating to particular areas of our activity.

General approach:

For most purposes, we will only process your information with your consent. In most cases, we will presume that by providing us with your details in order to obtain a service from us, you are consenting to us using those details in order to provide that service to you.

We do not sell personal details to any external organisations.

The main exception to the rule that we will not use your details for other purposes relates to the prevention of fraud. We are under a legal obligation to safeguard public funds and so in all cases we reserve the right to check the information you have provided for accuracy, in order to detect fraud. This may involve data matching exercises where we compare different sets of data which we hold for unusual matches or discrepancies; this may also include matching Council data with external data sources such as information held by credit reference agencies.

LGPS Database:

We participate in a data sharing project with other LGPS pension funds in England, Wales and Scotland. This is undertaken in order to comply with legal requirements contained in the LGPS's governing regulations. Provisions contained in the LGPS (Scotland) Regulations 2014 mean that, if a member of the LGPS dies, it is necessary for the scheme's administrators to know if the individual also had other periods of LGPS membership elsewhere in the country so that the right death benefits can be calculated and paid to the deceased member's dependants. As the LGPS is locally administered, each pension fund has its own membership records and it can be difficult to tell if an individual has other LGPS records and where these are held. To comply with the requirements set out above, a national Database has been developed that will enable funds to check if their members have LGPS pensions records in other pension funds.

For each member of the LGPS, the Database contains a short entry containing:

- The individual's National Insurance Number,
- A number to denote the individual's membership status,
- The last calendar year that the membership status changed, and

- A four digit number confirming the LGPS pension fund where that member's record is held.

The data will be shared using a secure electronic upload facility using an encrypted connection to the Database. The Database is hosted at the South Yorkshire Pensions Authority, an LGPS pension fund. The data is shared with other LGPS pension funds. These are all public bodies named in legislation as administering authorities of the LGPS.

The data held on the Database will be processed in accordance with the Data Protection Act 1998 and other relevant legislation. Responsibility for the use, content and security of the records lies with the data controller. SPF is currently a data controller for the personal data in the pension records they hold. All of the LGPS Funds (including SYPA who are hosting the database) and the Local Government Association will be data controllers for the purposes of the Database.

An extract of the membership information contained in the Database will periodically be shared with the Department for Work and Pensions (DWP) that the LGPS can join the Tell Us Once service. Tell Us Once is a service offered in most parts of the country when an individual registers a death. When the LGPS joins Tell Us Once and the death of an LGPS member is registered, the DWP systems will ensure that the LGPS pension fund is informed of the death, meaning that the member's records can be processed more quickly and simply than would otherwise be the case. For the Tell Us Once service, an extract of the Database containing individuals' NI Numbers will be securely shared with DWP every month so that they may maintain an up-to-date record of the LGPS's membership.

The data sharing will continue for as long as a) the relevant regulatory requirements remain, and b) the LGPS participates in the Tell Us Once service. In the event that neither of these conditions continues to apply, the data sharing will cease to be undertaken. If the data sharing ceases, then the records will be deleted from the database.

As this data sharing is partly being undertaken to comply with a legal requirement, it is not possible for scheme members to opt out of the data sharing.

National Fraud Initiative:

We also participate in anti-fraud data matching exercise carried out by other agencies such as the [National Fraud Initiative](#) (operated on behalf of Audit Scotland) and the Housing Benefit Matching Service (conducted on behalf of the Department for Work and Pensions). We have a duty to manage public funds properly. As a result, we will use the information you provide to make sure all amounts we are owed are paid on time. In relation to outstanding money owed, we may also share your information with debt management partners and the Courts. We may also share your information for the same purposes with other public organisations, including neighbouring councils that handle public funds, and with Police Scotland. We may also share your details with other organisations, including credit reference agencies, for the purposes of prevention and detection of fraud and confirming who is living at a particular address.

By law we are obliged to provide information to certain other public bodies such as the Department for Work and Pensions, HM Revenue and Customs, courts, tribunals, hearings, other formal bodies dealing with legal processes, and various external regulatory bodies. We also have an obligation to assist in the prevention of crime and we will therefore generally supply specific information which we are asked to provide to the police or other crime detection agencies, provided we are satisfied that the request is connected to an investigation and that disclosure would be lawful and proportionate.

External contractors are appointed to process information on our behalf and under our instructions. All contractors which do this are required to keep the personal information safe and follow our instructions about how they process the personal data.

We carry out statistical analyses of the information which we hold in order to monitor our performance in various areas and in order to improve service delivery. These statistics, once

they cannot identify any individuals, may be published or shared with other organisations or individuals.

If an individual elects to make public statements relating to us and we hold information showing that these statements are incorrect, we may publicise the fact that we hold information contradicting that version. We may also seek your consent to publish the contradictory information; if you decline to give us this consent, we may make your refusal of this consent public.

Area specific statements:

Please click on the relevant link below to learn more about how we use information in the following areas (clicking on these links will take you to the Glasgow City Council website, apart from Information on Cookies and Employers, which will redirect you on our website):

- [Media inquiries](#) – this provides information relating to queries from the press and media.
- [Requesting your details under the Data Protection Act 1998](#) – the Data Protection Act gives individuals the right to access personal data that an organisation holds about them and this section relates to making such a request.
- [Freedom of Information](#) – the Freedom of Information (Scotland) Act 2002 (“FOISA”) enables a person to request information held by a Scottish public authority. Should you wish to make a FOISA request, this section gives background information on this topic.
- [Information on cookies](#) – our websites use cookies to distinguish you from other users of the websites. This helps us to provide you with a good experience when you use our websites. This area specific statement provides more information relating to cookies.
- [National Fraud Initiative](#) – we are under a duty to protect the public funds we administer and as such, may share information provided to us with other bodies responsible for auditing or administering public funds in order to prevent and detect fraud. Please see the statement on NFI for further details.
- [Employers](#) – we are responsible for the administration of the LGPS in the West of Scotland in respect of Glasgow City Council, 11 other local authorities and over 200 other employers. Should you like to know more about what information employers provide to us, this statement provides details on this topic.

The main organisations we share information with are as follows:

- Police Scotland and other criminal investigation agencies
- External regulators
- DWP
- HMRC
- Scottish Government
- The (UK) Information Commissioner
- Office of the Public Guardian
- GAD
- ONS
- SPPA

Further information may be found by visiting the [Information Commissioner's website](#).

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Dated: June 2016