

QUESTIONS

ABOUT YOU

(Note: Information entered in this “About You” section may be published with your response (unless it is “not for publication”), except where indicated in **bold**.)

1. Are you responding as:

- an individual – in which case go to Q2A
- on behalf of an organisation? – in which case go to Q2B

2A. Which of the following best describes you? (If you are a professional or academic, but not in a subject relevant to the consultation, please choose “Member of the public”.)

- Politician (MSP/MP/peer/MEP/Councillor)
- Professional with experience in a relevant subject
- Academic with expertise in a relevant subject
- Member of the public

Optional: You may wish to explain briefly what expertise or experience you have that is relevant to the subject-matter of the consultation:

2B. Please select the category which best describes your organisation:

- Public sector body (Scottish/UK Government or agency, local authority, NDPB)
- Commercial organisation (company, business)
- Representative organisation (trade union, professional association)
- Third sector (charitable, campaigning, social enterprise, voluntary, non-profit)
- Other (e.g. clubs, local groups, groups of individuals, etc.)

Optional: You may wish to explain briefly what the organisation does, its experience and expertise in the subject-matter of the consultation, and how the view expressed in the response was arrived at (e.g. whether it is the view of particular office-holders or has been approved by the membership as a whole).

The British Red Cross has been providing health and social care services since

before the founding of the NHS and plays a unique role in health and social care in the UK. Our staff and volunteers work in hospitals, people's homes and the gaps in-between, providing person-centred support, simple acts of kindness and non-clinical interventions that make all the difference to patient care, recovery and outcomes. Our work addresses some of the immediate operational challenges facing the NHS and the wider care system today.

The British Red Cross first started providing the short-term loan of wheelchairs during World War One. We are the largest national provider of short-term wheelchairs in the UK. We provide wheelchairs to people with a short-term mobility need (defined as a need which is six months or less), including those who have had a fall or accident, are recovering from an operation, or have an ongoing condition, such as arthritis which can affect their mobility. In 2017, we supplied 87,500 mobility aids across the UK, including 58,000 wheelchairs (5,600 in Scotland).

We believe that everybody who needs a wheelchair should be entitled to access one, for as long as they need to. For this to be delivered, both legislative and practical changes are required. The British Red Cross is calling on the Scottish government to introduce a statutory duty for the provision of short-term wheelchairs, in the same way as long-term provision.

3. Please choose one of the following:

- I am content for this response to be published and attributed to me or my organisation
- I would like this response to be published anonymously
- I would like this response to be considered, but not published ("not for publication")

If you have requested anonymity or asked for your response not to be published, please give a reason. **(Note: your reason will not be published.)**

4. Please provide your name or the name of your organisation. **(Note: The name will not be published if you have asked for the response to be anonymous or "not for publication".)**

Name: British Red Cross

Please provide a way in which we can contact you if there are queries regarding your response. Email is preferred but you can also provide a postal address or phone number. **(Note: We will not publish these contact details.)**

5. Data protection declaration

- I confirm that I have read and understood the privacy notice attached to this consultation which explains how my personal data will be used.

YOUR VIEWS ON THE PROPOSAL

Note: All answers to the questions in this section may be published (unless your response is “not for publication”).

Aim and approach

1. Which of the following best expresses your view of establishing a duty to provide a wheelchair to anyone who has been assessed as having a short-term need for one (defined as less than 6 months)?

- Fully supportive
 Partially supportive
 Neutral (neither support nor oppose)
 Partially opposed
 Fully opposed
 Unsure

Please explain the reasons for your response:

The British Red Cross is fully supportive of establishing a duty to provide short-term wheelchairs. Our research demonstrates the significant positive impact that a short-term loan of a wheelchair can have by helping people with mobility issues to manage day-to-day life and to recover from illness more quickly. Wheelchair loans can enable shorter hospital stays, with patients returning home sooner where they can recover faster and in greater comfort.¹

The British Red Cross report, ‘Maintaining mobility: understanding the unmet need for short-term mobility aids [Scotland advocacy summary]’, found that of those who borrowed a short-term wheelchair, 90 per cent said it was very helpful and enabled them to manage day-to-day activities. Almost half (49 per cent) said their wheelchair

¹ Putting the wheels in motion: Assessing the value of British Red Cross short-term wheelchair loan, p. 31.

hastened their recovery time. Without wheelchair provision, many of the participants in the British Red Cross study spoke of the difficulties and challenges they had in maintaining their daily life and work: 50 per cent said that their employment was affected in some way by their mobility issue; 34 per cent had to leave employment altogether.²

Short-term wheelchair loans are an enabler of recovery, choice, control, independence and wellbeing. Given the positive effect that accessing a short-term wheelchair has on people's ability to continue with their day-to-day life and recover, the British Red Cross strongly supports this Bill.

2. What is your view on setting a target for providing a wheelchair to a person who (a) has been assessed as having a short-term need for one and (b) is otherwise ready to use it?

- Target of 24 hours (where practicable)
- Target of 48 hours (where practicable)
- Target of 72 hours (where practicable)
- Another target (please specify)
- No target in the legislation
- Unsure

Please explain the reasons for your response:

The British Red Cross believes that those who are identified as having a short-term need for a wheelchair should receive one as quickly as possible. It is important for those who have been discharged from hospital to receive a wheelchair quickly, and within the next working day. From our operational experience of providing mobility aids we understand that initially it may take providers up to 72 hours, given that providers may not currently be operating 7 days a week. The point at which a person is assessed as being in need is an unsettling one, and this anxiety should be relieved as soon as possible.

People's experiences of ill health do not finish when they are discharged from hospital. The health and social care system must better consider the environment and circumstances that the person leaving hospital is returning to as well as the factors that are likely to influence the trajectory of their recovery over the long-term. Our 'Home to the Unknown' research report on hospital discharge called for this trajectory to be recognised so that every patient is helped to thrive after they leave hospital, rather than just cope.³ Most are on a trajectory of recovery that continues at home.

² Maintaining mobility: understanding the unmet need for short-term mobility aids [Scotland advocacy summary], p. 6 & p. 12.

³ Home to the Unknown: Getting hospital discharge right, p. 55.

Ensuring physical independence at home as soon as possible, for example through a short-term wheelchair, can give someone the greatest chance of returning to good health and an independent life after hospital. It ensures a person can maintain their daily routine and domestic tasks adequately, and minimises the chance of them being readmitted to hospital. Wheelchairs are important for reducing social isolation by allowing greater mobility and social connectedness. The negative impact of social isolation on physical health is well proven and worth preventing.⁴ A wheelchair allows independence, contributing to overall wellbeing- a key determinant of recovery.

3. Which of the following best expresses your view of where the Bill should place the duty to provide short-term access to wheelchairs to people assessed as needing them?

- Duty placed on NHS Boards
- Duty placed on NHS Boards, but with a requirement to delegate it to Integrated Authorities (Health & Social Care Partnerships)
- Duty placed on Integrated Authorities (Health & Social Care Partnerships)
- Other (please specify)
- Unsure

Please explain the reasons for your response:

The British Red Cross has no position on where the duty should be placed, as long as the body ensures that need is met and that providers are properly funded to deliver the appropriate service. We think that whoever has the statutory duty should be given the necessary powers to hold providers to account, and providers in turn should be adequately funded for providing the service.

4. Which of the following best expresses your view of how further provision about wheelchair access (e.g. assessment criteria and eligibility) should be made?

- Ministers should have power to make regulations or give (binding) directions
- Ministers should have power to issue (non-binding) guidance
- It should be left to NHS boards or Health and Social Care Partnerships (as the case may be) to develop the criteria for themselves.
- Other (please specify)

⁴ A Brigham Young University study found “that individuals who were socially isolated, lonely or living alone at study initiation were more likely to be deceased at the follow-up, regardless of participants’ age or socioeconomic status, length of the follow-up, and type of covariates accounted for in the adjusted models” (HoltLunstad, et al., 2015: 233). The same authors identify that substantial research “has also elucidated the psychological, behavioural and biological pathways by which social isolation and loneliness lead to poorer health and decreased longevity” (ibid: 235).

Unsure

Please explain the reasons for your response:

The British Red Cross believe that further provision about wheelchair access should be made at a Ministerial level. Ensuring responsibility for provision at a national level would mean a consistent outcome across Scotland. Conflicting pressures and demands upon local providers could make it difficult to provide a new service consistently across Scotland, national guidelines would facilitate a smooth transition to this new provision. Our research has found that most statutory wheelchair providers (82 per cent) do not supply wheelchairs for short-term use, and provision is a postcode lottery, with only providers in some areas offering wheelchairs for short-term use.⁵

5. Which of the following best expresses your view of requiring Scottish Ministers to report back to the Parliament on the operation of the legislation?

- Duty to report every year
 Duty to report every two years
 Duty to report every three years
 Duty to report every five years
 Unsure
 Other (please specify)

Please explain the reasons for your response:

As this is new legislation, a duty to report every year to monitor implementation would ensure standards and quality outcomes are met.

Financial implications

7. Taking account of both costs and potential savings, what financial impact would you expect the proposed Bill to have on:

(a) Government and the public sector (including the NHS, local authorities)

- Significant increase in cost
 Some increase in cost
 Broadly cost-neutral
 Some reduction in cost
 Significant reduction in cost
 Unsure

⁵ Maintaining mobility: understanding the unmet need for short-term mobility aids, p. 7.

(b) Businesses (including makers and suppliers of wheelchairs)

- Significant increase in cost
- Some increase in cost
- Broadly cost-neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

(c) The third sector (including charities and voluntary bodies supporting those with mobility issues)

- Significant increase in cost
- Some increase in cost
- Broadly cost-neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

(d) Individuals (including people with mobility issues and their relatives)

- Significant increase in cost
- Some increase in cost
- Broadly cost-neutral
- Some reduction in cost
- Significant reduction in cost
- Unsure

Please explain the reasons for your response.

Although there would be some initial increase in cost for the government and the public sector due to the necessary investment in statutory provision, the cost savings in terms of aiding someone's recovery should not be disregarded and are critical to consider. Our research demonstrates the longer-term cost savings of short-term wheelchair loans.

The Economic Evaluation from the British Red Cross report 'Putting the wheels in motion: Assessing the value of British Red Cross short-term wheelchair loan' revealed overall health and social care savings ranging from £469 to £4,607 across nine case studies, with an average saving of £1,676.⁶ These findings clearly quantify the preventative value of short-term wheelchair loans with cost savings evidenced across both health and social care.

⁶ Putting the wheels in motion: Assessing the value of British Red Cross short-term wheelchair loan, p. 31.

Health savings were particularly high and ranged from £343 to £4,139 (the average saving per case study was £1,344).⁷ The most frequently reported saving related to transport, whereby transport (such as an ambulance) would have been required to attend a health care facility or home visits would have been required. Social care savings played out in the prevention of either an increase to an existing care package, the introduction of a care package, or the need to support dependents of the wheelchair user. Social care savings ranged from £100 to £1,400, with an average saving of £332.⁸

Further, this research identified economic benefits beyond savings to health and social care services, as wheelchair users could return to work or education quicker. This benefitted personal income and savings.

On the effect of an increase in demand for the service on the Voluntary and Community Sector (VCS), this increase would cause the VCS to re-evaluate their operating model. This would include assessing access points, hours of opening, and staffing to ensure it continues to be competent of service delivery. A substantial rise in demand would also require an investment in additional equipment stocks. Once this adjustment has taken place and volumes of demand are known, at a system level the provision could become cost- neutral.

Equalities

7. What overall impact is the proposed Bill likely to have on equality, taking account of the following protected characteristics (under the Equality Act 2010): age, disability, gender re-assignment, maternity and pregnancy, marriage and civil partnership, race, religion and belief, sex, sexual orientation?

- Positive
- Slightly positive
- Neutral (neither positive nor negative)
- Slightly negative
- Negative
- Unsure

Please explain the reasons for your response.

The British Red Cross does not believe this Bill will affect groups with protected characteristics negatively, given that requiring wheelchair access affects multiple groups. Of these multiple groups, without this provision older people would continue to be disadvantaged by social isolation, and those on a lower income would continue to be

⁷ *Ibid.*

⁸ *Ibid.*

unable to afford a short-term wheelchair. There is also an issue of awareness. As there is no current statutory duty, many people fall through the cracks as they are unaware of voluntary organisations providing short-term wheelchairs. Statutory provision will ensure that people are aware of the services that they are entitled to. We expect there will be an equalities section in the Bill that will provide legal protection for protected characteristics.

8. In what ways could any negative impact of the Bill on equality be minimised or avoided?

n/a

Sustainability

9. Do you consider that the proposed Bill can be delivered sustainably, i.e. without having likely future disproportionate economic, social and/or environmental impacts?

- Yes
 No
 Unsure

Please explain the reasons for your response.

The British Red Cross believes that the Bill can be delivered sustainably, given the positive benefits of providing short-term wheelchairs. Providing short-term wheelchairs will prevent some health issues deteriorating once people return home from hospital, and minimise the chance of them being readmitted to hospital. In part 7, we have outlined the cost savings that would make this provision sustainable.

Short-term wheelchairs could significantly alter people's long-term health and wellbeing trajectory, given the independence that they provide. The equipment itself is reusable, and will have a long life with maintenance. The longer term economic and social benefits short-term wheelchairs offer have the potential to offset any immediate or recurring costs to the health services.

General

10. Do you have any other comments or suggestions on the proposal?

People have an unmet need for wheelchairs across the UK. The British Red Cross is the largest national provider of short-term wheelchairs in the UK. We work to fill the gap in provision as far as possible, however, despite loaning around 58,000 wheelchairs we

know that we are unable to meet everybody's needs. Solutions are required to meet the needs of up to 8 per cent of the population. Out of the 139 listed NHS wheelchair providers, only 25 provide short-term wheelchair loans. Across our work relating to health and social care, we see the negative impact of not being able to access a wheelchair when needed. People may become socially isolated, find they are unable to get to important medical appointments or work, and suffer from worsening health. We also see the positive impacts when people are able to access the right wheelchair at the right time.

The benefit that short-term wheelchair provision delivers to the broader health and social care system - reducing pressures, speeding recovery time, enabling people to return home from hospital sooner and supporting them to live independently at home – is invaluable.

HOW TO RESPOND TO THIS CONSULTATION

You are invited to respond to this consultation by answering the questions in the consultation and by adding any other comments that you consider appropriate.

Format of responses

You are encouraged to submit your response via an online survey (Smart Survey) if possible, as this is quicker and more efficient both for you and the Parliament. However, if you do not have online access, or prefer not to use Smart Survey, you may also respond by e-mail or in hard copy.

Online survey

To respond via online survey, please follow this link: **[insert URL]**.

The platform for the online survey is Smart Survey, a third party online survey system enabling the SPCB to collect responses to MSP consultations. Smart Survey is based in the UK and is subject to the requirements of the General Data Protection Regulation (GDPR) and any other applicable data protection legislation. Any information you send in response to this consultation (including personal data) will be seen by the MSP progressing the Bill and by staff in NGBU.

Further information on the handling of your data can be found in the Privacy Notice, which is available either via the Smart Survey link above, or at the end of this document.

Smart Survey's privacy policy is available here:

<https://www.smartsurvey.co.uk/privacy-policy>

Electronic or hard copy submissions

Responses not made via Smart Survey should, if possible, be prepared electronically (preferably in MS Word). Please keep formatting of this document to a minimum. Please send the document by e-mail (as an attachment, rather than in the body of the e-mail) to:

jackie.baillie.msp@parliament.scot

Responses prepared in hard copy should either be scanned and sent as an attachment to the above e-mail address or sent by post to:

Jackie Baillie MSP
Room M1.13
Scottish Parliament
Edinburgh EH99 1SP

Responses submitted by e-mail or hard copy may be entered into Smart Survey by my office or by NGBU.

If submitting a response by e-mail or hard copy, please include written confirmation that you have read and understood the Privacy Notice (set out below).

You may also contact my office by telephone on (0131) 348 5905.

Deadline for responses

All responses should be received no later than **[date]**. Please let me know in advance of this deadline if you anticipate difficulties meeting it. Responses received after the consultation has closed will not be included in any summary of responses that is prepared.

How responses are handled

To help inform debate on the matters covered by this consultation and in the interests of openness, please be aware that I would normally expect to publish all responses received (other than “not for publication” responses) on my website **[insert URL]**. Published responses (other than anonymous responses) will include the name of the respondent, but other personal data sent with the response (including signatures, addresses and contact details) will not be published.

Where responses include content considered to be offensive, defamatory or irrelevant, my office may contact you to agree changes to the content, or may edit the content itself and publish a redacted version.

Copies of all responses will be provided to the Scottish Parliament’s Non-Government Bills Unit (NGBU), so it can prepare a summary that I may then lodge with a final proposal (the next stage in the process of securing the right to introduce a Member’s

Bill). The Privacy Notice (below) explains more about how the Parliament will handle your response.

If I lodge a final proposal, I will be obliged to provide copies of responses (other than “not for publication” responses) to the Scottish Parliament’s Information Centre (SPICe). SPICe may make responses available to MSPs or staff on request.

Requests for anonymity or for responses not to be published

If you wish your response to be treated as anonymous or “not for publication”, please indicate this clearly. The Privacy Notice (below) explains how such responses will be handled.

Other exceptions to publication

Where a large number of submissions is received, particularly if they are in very similar terms, it may not be practical or appropriate to publish them all individually. One option may be to publish the text only once, together with a list of the names of those making that response.

There may also be legal reasons for not publishing some or all of a response – for example, if it contains irrelevant, offensive or defamatory content. If I think your response contains such content, it may be returned to you with an invitation to provide a justification for the content or to edit or remove it. Alternatively, I may publish it with the content edited or removed, or I may disregard the response and destroy it.

Data Protection

As an MSP, I must comply with the requirements of the General Data Protection Regulation (GDPR) and other data protection legislation which places certain obligations on me when I process personal data. As stated above, I will normally publish your response in full, together with your name, unless you request anonymity or ask for it not to be published. I will not publish your signature or personal contact information. The Privacy Notice (below) sets out in more detail what this means.

I may also edit any part of your response which I think could identify a third party, unless that person has provided consent for me to publish it. If you wish me to publish information that could identify a third party, you should obtain that person’s consent in writing and include it with your submission.

If you consider that your response may raise any other issues under the GDPR or other data protection legislation and wish to discuss this further, please contact me before you submit your response. Further information about data protection can be found at: www.ico.gov.uk.

Freedom of Information (Scotland) Act 2002

As indicated above, NGBU may have access to information included in, or provided with, your response that I would not normally publish (such as confidential content, or your contact details). Any such information held by the Parliament is subject to the requirements of the FOISA. So if the information is requested by third parties the Scottish Parliament must consider the request and may have to provide the information unless the information falls within one of the exemptions set out in the Act. I cannot therefore guarantee that any such information you send me will not be made public should it be requested under FOISA.

Further information about Freedom of Information can be found at:

www.itspublicknowledge.info.

Privacy Notice

This privacy notice explains how the personal data which may be included in, or is provided with, your response to a MSP's consultation on a proposal for a Member's Bill will be processed. This data will include any personal data including special categories of personal data (formerly referred to as sensitive personal data) that is included in responses to consultation questions, and will also include your name and your contact details provided with the response. Names and contact details fall into normal category data.

Collecting and holding Personal Data

The Scottish Parliamentary Corporate Body (the SPCB) processes any personal data you send to it, or that the MSP whose consultation you respond to shares with it (under a data-sharing agreement) according to the requirements of the General Data Protection Regulation (EU) 2016/679 (the GDPR) and the Data Protection Act 2018 (the DPA)

Personal data consists of data from which a living individual may be identified. The SPCB will hold any personal data securely, will use it only for the purposes it was collected for and will only pass it to any third parties (other than the MSP whose consultation you respond to) with your consent or according to a legal obligation. Further information about the data protection legislation and your rights is available here:

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Sharing Personal Data

The data collected and generated by Smart Survey will be held by the Non-Government Bills Unit (NGBU), a team in the Scottish Parliament which supports MSPs progressing Members' Bills, and shared with the MSP who is progressing the Bill and staff in the MSP's office. Data submitted by other means (e.g. by email or hard copy) will be held by the MSP's office and shared with NGBU for the purpose of producing a summary of responses to the consultation. The MSP and NGBU are joint data controllers of the

data. Under a data-sharing agreement between the MSP and the Scottish Parliament, access to the data is normally limited to NGBU staff working on the Member's Bill/proposal, the MSP and staff in the MSP's office working on the Member's Bill/proposal; but data may also be shared by NGBU with the Scottish Parliament's solicitors in the context of obtaining legal advice.

Publishing Personal Data

"Not for publication" responses will not be published and will only be referred to in the summary of consultation responses in the context of a reference to the number of "not for publication" responses received and, in some cases, in the context of a general reference that is considered by you to be consistent with the reasons for choosing "not for publication" status for your response.

Anonymous responses will be published without your name attached, your name will not be mentioned in the summary of consultation responses, and any quote from or reference to any of your answers or comments will not be attributed to you by name.

Other responses may be published, together with your name; and quotes from or references to any of your answers or comments, together with your name, may also be published in the summary of consultation responses.

Contact details (e.g. your e-mail address) provided with your response will not be published, but may be used by either the MSP's office or by NGBU to contact you about your response or to provide you with further information about progress with the proposed Bill.

Where personal data, whether relating to you or to anyone else, is included in that part of your response that is intended for publication, the MSP's office or NGBU may edit or remove it, or invite you to do so; but in certain circumstances the response may be published with the personal data still included.

Please note, however, that references in the foregoing paragraphs to circumstances in which responses or information will not be published are subject to the Parliament's legal obligations under the Freedom of Information (Scotland) Act 2002. Under that Act, the Parliament may be obliged to release to a requester information that it holds, which may include personal data in your response (including if the response is "not for publication" or anonymous).

Use of Smart Survey software

The Scottish Parliament is licensed to use Smart Survey which is a third party online survey system enabling the Scottish Parliament to collect responses to MSP consultations, to extract and collate data from those responses, and to generate statistical information about those responses. Smart Survey is based in the UK and is subject to the requirements of data protection legislation.

Any information you send by email or in hard copy in response to a consultation on a proposal for a Member's Bill may be added manually to Smart Survey by the MSP's office or by NGBU.

The privacy policy for Smart Survey is available here:

<https://www.smartsurvey.co.uk/privacy-policy>

While the collected data is held on SmartSurvey, access to it is password protected. Where the data is transferred to our own servers at the Scottish Parliament, access will be restricted to NGBU staff through the application of security caveats to all folders holding consultation data.

Access to, retention and deletion of personal data

As soon as possible after a summary of consultation responses has been published, or three months after the consultation period has ended, whichever is earlier, all of your data will be deleted from Smart Survey. If, three months after the consultation period has ended, a summary has not been published, then the information that we would normally publish – including all your answers to questions about the proposal (unless your response is “not for publication”) and your name (unless you requested anonymity), but not your contact details – may be downloaded from Smart Survey to SPCB servers and retained until the end of the session of the Parliament in which the consultation took place. If the MSP lodges a final proposal, he/she is required to provide a copy of your response (unless it was “not for publication”), together with your name (unless you requested anonymity), but not your contact details, to the Scottish Parliament Information Centre (SPICe), where it may be retained indefinitely and may be archived.

Purpose of the data processing

The purpose of collecting, storing and sharing personal data contained in consultation responses is to enable Members to consider the views of respondents to inform the development of the Bill, with the support of NGBU. Personal data contained in consultation responses will not be used for any other purpose without the express consent of the data subject.

The legal basis

The legal basis for collecting, holding, sharing and publishing your personal data is that the processing is necessary for the performance of a task carried out in the public interest, or in the substantial public interest, in accordance with Art 6(1)(e) GDPR, s8(d) DPA, or Art 9(1)(g) GDPR, s10 of and paragraph 6 of Schedule 1 of the DPA. The task is the support of Members seeking to introduce Members' Bills to the Parliament. This is a core task of the SPCB and therefore a Crown function. The adequate support of the Members Bill process and the ability to seek, use and temporarily store personal data including special category data is in the substantial public interest.

If the person responding to the consultation is under the age of 12 then consent from the parent or guardian of the young person will be required to allow the young person to participate in the consultation process (however, the legal basis for the processing of the personal data submitted remains as the public interest task basis identified above).

Your rights

Data protection legislation sets out the rights which individuals have in relation to personal data held about them by data controllers. Applicable rights are listed below, although whether you will be able to exercise data subject rights in a particular case may depend on the purpose for which the data controller is processing the data and the legal basis upon which the processing takes place. For example, the rights allowing for erasure of personal data (right to be forgotten) and data portability do not apply in cases where personal data is processed for the purpose of the performance of a task carried out in the public interest. The right to object to the processing of personal data for the purpose of a public interest task is restricted if there are legitimate grounds for the processing which override the interest of the data subject. This would be considered on a case by case basis and depends on what personal data is involved and the risks further processing of that data would pose to you. As described above, the collection, storage, sharing and publishing of personal data contained in consultation responses is a task carried out in the public interest, which means that these three data subject rights do not apply here or only in a restricted scope.

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

Objecting to how we may use your information – Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

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 about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, 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.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

Changes to our privacy notice

We keep this privacy notice under regular review and will place any updates on this website. Paper copies of the privacy notice may also be obtained using the contact information below.

This privacy notice was last updated on 28 June 2018.

Contact information and further advice

If you have any further questions about the way in which we process personal data, or about how to exercise your rights, please contact:

Head of Information Governance
The Scottish Parliament
Edinburgh
EH99 1SP
Telephone: 0131 348 6913 (Text Relay calls welcome)
Textphone: 0800 092 7100
Email: dataprotection@parliament.scot

Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

- Online: <https://ico.org.uk/global/contact-us/email/>
- By phone: 0303 123 1113