

request-241940-a7aa8f05@whatdotheyknow.com

7 Tweedside Park

Tweedbank

GALASHIELS

TD1 3TE

www.sppa.gov.uk

Tel: 01896 893238

Fax: 01896 893214

Marion.chapman@scotland.gsi.gov.uk

Our ref: FOI/14/01949

17th December 2014

Dear Mr Caulfield,

REQUEST UNDER THE FREEDOM OF INFORMATION (SCOTLAND) ACT 2002 (FOISA)

Thank you for your request for information under the Freedom of Information (Scotland) Act 2002 dated 29th November 2014, concerning consent to share sensitive personal data.

Your request

SPPA have taken over the administration and payment of Police pensions in Scotland. Personal data has been transferred from Police Scotland to SPPA via two private companies: Heywood Limited, suppliers of pension software used by SPPA, and EDM Group, contracted the task of scanning documents.

1. Please specify any action taken or considered to obtain consent of Police Pensioners to process their personal data prior to transfer?
2. Please specify any action taken or considered to obtain explicit consent in respect of pensioners sensitive personal data?
3. Please specify any action taken or considered to obtain pensioners consent to disclose their processed data to third party private companies ie. Heywood Ltd and EDM Group?
4. Please supply copies of any correspondence, documents, e mails between SPPA and Police Scotland relevant to obtaining consent of data subjects prior to transfer of Police pensions to SPPA?

Response to your request

Questions 1-4: We do not hold the information you have requested. All Police Pensioners were informed of the new Data Controller arrangements and the transfer of data by means of a 'Fair Processing Notice' issued by the current administering authorities and the Scottish Police



Authority on behalf of Police Scotland. In addition, SPPA has agreed data transfer protocols with each of the existing administering authorities.

Your right to request a review

If you are unhappy with this response to your FOI request, you may ask us to carry out an internal review of the response, by writing to Neville Mackay, Chief Executive (at the address above). Your review request should explain why you are dissatisfied with this response, and should be made within 40 working days from the date when you received this letter. We will complete the review and tell you the result, within 20 working days from the date when we receive your review request.

If you are not satisfied with the result of the review, you then have the right to appeal to the Scottish Information Commissioner. More detailed information on your rights is available on the Commissioner's website at: www.itspublicknowledge.info.

Yours sincerely



Marion Chapman
Director of Corporate Services