



Privacy Notice – Learning Pembrokeshire

1. Why do we collect and keep your personal information?

We collect and use your personal information so that we can administer and provide you with Adult and Community Learning courses

The Processing of your data is:

- Because it is necessary for the performance of this task to do so
- Because you have consented to digital communication

2. How Information about you is used.

The information that you provide will be processed according to the General Data Protection Regulation 2016, Lifelong Learning Record Wales (LLWR) and other grant funded regulations that would apply to support your learning.

We have a duty to protect the public funds we administer and may use the information provided by you on this form to provide information to LLWR.

We will also make any disclosures required by law and we may also share this information with other bodies responsible for detecting/preventing fraud or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost effective way. In order to achieve this, information may be shared with other internal departments within Pembrokeshire County Council and with The Auditor General for Wales.

We will not make any disclosures to third parties for marketing purposes, unless you have consented otherwise.

Your data will be secure and confidential at all times and we will only collect the personal information that is required to provide you with Adult and Community Learning and assess your entitlement to concessionary fees, if appropriate.

3. Digital communication.

At point of registering for or booking a course, our service requires that text messaging and emailing are used for administration and communication, where mobile phone numbers and email addresses have been provided. You can opt out of this arrangement at any time, by contacting staff at the Community Learning Centre administering your course or by emailing learn@pembrokeshire.gov.uk

4. How long do we keep hold of your information?

We will retain the information provided to us for (see Annexe 1) and your information will be securely disposed of once it is no longer required.

5. Access to my personal information?

You can find out if we hold any personal information by making a subject access request under the General Data Protection Act Regulation 2016. To make a request for any personal information we may hold you need to put your request in writing addressing it to:

Access to Records Team
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

6. Your Rights.

Under the General Data Protection Regulation 2016 you have rights as an individual which you can exercise in relation to the information we hold about you:

- The right to be **informed**
- The right of **access** – you are entitled to request access to and a copy of, information we hold about you
- The right to **rectification** – you have the right to ask to have your information corrected
- The right to **restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties
- The right to **object** – this is not an absolute right and will depend on the reason for processing your personal information
- The right to **not be subject to automated decision-making and profiling**.

7. Complaints or Queries.

Pembrokeshire County Council endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Jo Hendy, Data Protection Officer
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: dataprotection@pembrokeshire.gov.uk

Telephone: 01437 764551

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Email caseworker@ico.org.uk
Telephone No: 0303 123 1113

8. Changes to this privacy notice.

We keep our privacy notice under regular review



Retention guidelines

The following retention guidelines are based on the Audit Commission for Local Government and Health Bodies Act 1998 applied to general activities and General Data Protection Regulation (GDPR) implemented from May 2018.

Retention of records for European funded projects will be defined by the original contract and will be for much longer than standard retention – please refer to project contract terms and conditions, for retention specifics and dates. Documentation in these cases refers to ALL project documentation i.e. timesheets, finance records, beneficiary records, examination records, general administration and correspondence.

For general activities, when archiving, it is recommended that archive boxes are filed with “like” records as this is easier to review, as they have different retention periods.

Recommended options are:

- Pay sheets/tutor claims
- Finance records (originals only)
- Beneficiary records
- Examination records
- General administration and correspondence

The **destruction review date MUST** be clearly marked on the outside of each storage box and each box should contain a transmittal list, detailing the contents of the box. A copy of the transmittal list of the contents of each archive box, must be maintained within the Community Learning Centre or Service office for reference.

Community Learning Centres and Services are to securely store and retain records for current year PLUS two full previous years on the Community Learning Centre or Service premises. All older documents requiring retention, are to be stored in Pembrokeshire County Council’s Record Management Unit (RMU). Copies of the transmittal lists of the contents of each archive box in RMU, must also be retained at the Community Learning Centre or Service office for reference.

It is necessary to archive and maintain **primary source documents**. Invoices, which are scanned, will be maintained centrally by Pembrokeshire County Council – archiving of photocopy invoices is not necessary.

Pay sheets/claims and any unpaid claims: KEEP FULL 10 YEARS after the end of the financial year to which they relate (for pension purposes).

Employee leave records:

- Compassionate leave – keep current plus two calendar years
- Request and approval of annual leave carried forward – current and previous year
- Record of annual leave taken – Line Manager must retain current and previous year
- TOIL – Line Manager must retain current and previous year
- Absence returns are retained by HR

General correspondence, estimates including calculations and stats: KEEP FULL 3 YEARS after the end of the financial year to which they were produced (for financial compliance purposes).

Principle finance records - Receipt books, banking records and original invoices: KEEP FULL 6 YEARS after the end of the audit period of the financial year to which they relate (for grant and financial compliance purposes).

Following termination of employment - Personnel files, copy letters of appointment, copy contracts references, related correspondence and records of leave/sickness: Any original documents should be sent to HR for retention following termination and any copies destroyed.

Enrolment forms, registers, class lists, examination records, evaluation forms, PSLs, etc: KEEP FULL 6 YEARS after the end of the audit period for the financial year to which the grant relates (for grant compliance purposes).

Audit reports: KEEP 2 years after formal clearance by the appointed auditor (for financial compliance purposes).

Key records relating to buildings and engineering works such as surveys, site plans, drawings, bills of quantities, contract documents, including any that have been abandoned or deferred, deeds, lease documents, insurance policies, inventories, valuations – PERMANENT PRESERVATION ONLY IF ORIGINAL DOCUMENTATION.

Communities First have confirmed that their required retention period is a FULL 5 YEARS after the end of grant period to which they relate. However, in most cases, other funding is connected to the activity, so the retention period will be defined by the funder with the longest requirement.

Archives should be reviewed periodically. NO ITEMS ARE TO BE DESTROYED until checked and destruction agreed with appropriate Lifelong Learning Co-ordinator.

Student Information Database (SID) – Any learner records, non-current tutor records or activity records, which are older than 10 years after the end date of the course, will be deleted from the system in an annual process.