

Privacy Notice

This Privacy Notice applies to the following service areas:

- Corporate Learning and Development
- SCWWDP
- Education CPD

Pembrokeshire County Council Learning and Development, the SCWWDP and Education CPD are committed to protecting your privacy and personal details shared with us.

This privacy policy sets out the legal basis for processing any personal data we collect from you or you provide to us, it is either necessary for the performance of a contract or because it is in the exercise of our official authority. Please read the following carefully to understand our practices regarding your personal data. By supplying information to us, you are agreeing to the practices described in this policy.

Depending on the purpose for which you provide your personal data, for the purpose of the General Data Protection Regulation 2016 the data controller will be either Corporate Learning or Development, SCWWDP or Education CPD and/or any relevant training related sector within Pembrokeshire County Council department. Within this context, “we” means the relevant Pembrokeshire County Council training department.

Data we may collect from you

Pembrokeshire County Council training teams may collect and process the following data about you:

- Personal information provided by you via an application form.
- Other personal information may be collected for some accredited courses. The accrediting body will hold this information – please see relevant privacy policy from specific accrediting body.
- We will keep copies of certain accredited certificates you achieve until the certificate expires. All copies will be destroyed once expired.
- The training request section of your Performance Appraisal form may be sent to us by your managers
- Contact information you provide may or may not be kept for future use.
- Coaches will keep records of coaching sessions undertaken with coachees.
- We may ask you to complete surveys and reactionnaire for research purposes – these will be specific to a course that has been attended, or relevant to any learning and development opportunity being offered to you.
- Details of any training you have completed will be collected and uploaded onto iTrent. Please see iTrent Fair Processing Notice for more information.

- If you supply your bank details for payments for services provided, data may be collected if appropriate for payments to be made.
- Details regarding qualifications undertaken with external providers e.g. ILM including progress and completion details

How we use your data

Your data will only be used for the purposes indicated when you submit data or as detailed under this privacy policy.

We use personal information held about you in the following ways:

- To update and enhance our records
- To update and enhance your training record for your benefit
- Information regarding your place of work will be used for reports, however nothing about you personally will be used in any report.
- To organise training for you if it has been requested as part of your Performance Appraisal
- To review and evaluate course content, course materials and external training suppliers.
- Information regarding your training and training record will be held on iTrent. Please see iTrent Fair Processing Notice for information.
- Information regarding your e-Learning completions will also be held on Pembrokeshire Online Development (POD).
- To commission you to provide training and to make necessary payments following delivery of training.

Disclosure of your data

We will not disclose any of your personal data, unless it is otherwise specified before you supply it to us. Under special circumstances, HR and/or managers can request to see your training record if they feel it is necessary, for example during an investigation or for their own information. If you are a commissioned provider of training Internal Audit or Wales Audit may view the details of payments made to you as part of annual audit processes.

The information that you provide will be processed according to the General Data Protection Regulation 2016. 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.

How long your data will be kept

Depending on the type of information we collect, we will store your data for anywhere between 1 – 35 years. The following guidelines are strictly adhered to:

Information type	Destroyed after
Routine staff training (excluding occupational health and safety or children/vulnerable adults related)	2 years
Training details concerning children and vulnerable adults	35 years
Training requests (e.g. application forms)	2 years
Proof of completion of training	7 years
Coaching records and association information	1 year
ILM qualifications, assignments and mark sheets	1 year
Bank details collected from service providers	7 years
Individual training records	See iTrent Fair Processing Notice

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 Regulations 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

Your Rights.

Under the General Data Protection Regulations 2016, you have rights as an individual which you can exercise in relation to the information we hold about you, not all rights will apply it will depend on the legal basis for processing your data.

- The right to be informed – Individuals have the right to be informed about the collection and use of their personal data. This is a key transparency requirement under the GDPR
- 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 erasure – this is not an absolute right and will depend on the reason for processing your personal information
- The right to Data Portability – This only applies to data processing that is carried out by automated means
- 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.

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. Please direct any requests 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 that oversees data protection law:

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

7. Changes to this privacy notice.

We keep our privacy notice under regular review.