

### **PN031 - PRIVACY NOTICE**

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR) effective from the 8<sup>th</sup> October 2019

<b>TCBC Service Area:</b>	Resources
<b>Work area:</b>	Organisational Development Team
<b>Contact Details:</b>	socialservices.trainingadmin@torfaen.gov.uk
<b>Privacy Notice Name:</b>	Organisational Development Privacy Notice

#### **Data controller:**

Torfaen County Borough Council  
C/o Civic Centre  
Pontypool  
NP4 6YB

#### **Data Protection & Information Governance Officer:**

Susan Bullock  
01633 647467  
Email: dpa@torfaen.gov.uk

#### **1) Have we sourced your personal data, directly from you?**

Yes

#### **If no, how did we obtain your personal data?**

In certain circumstances (in particular in relation to booking online training which requires email addresses to register) there may be occasion where personal data is shared on your behalf (e.g. by a line manager or training co-ordinator). We will ensure that this is always be done with your confirmed permission.

#### **2) What information does the Organisational Development Team (ODT) collect about you?**

The Organisational Development Team collects and processes a range of information about you for various reasons outlined below.

In **general** the information collected and processed may include:

- Name
- Postal address
- E-mail address
- Telephone number
- Employer details
- Job title

In addition (**for Qualification application and registration purposes only**) the ODT may also collect and process the following:

- Date of Birth
- Information in relation to 'special categories' (see below)
- Employment history
- Qualification history
- Registration number
- DBS information

**3) The ODT may collect this information in a variety of ways:**

- Computer based applications and booking forms
- Signing up as a member of the Social Care Partnership of Torfaen
- Correspondence with us by phone, e-mail, or in writing;
- Signing a course register;
- Completing a post course evaluation form;
- Completing an online consultation or survey;
- Requesting information from us about products and/or services,
- Shared distribution list (Foster Carers only)

**We will store your data using:**

- A secure third party 'Customer Relationship Management (CRM) Database (for managing training bookings and records) and Learning Management System' (LMS) database (for providing e-learning)
- Secure internal computer filing systems and databases (TNA, workforce audit).
- Email retention (for 3 months only).

In addition, if you visit our website, we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

#### **4) Why does the ODT process your personal data?**

The information is necessary to enable us to pursue our legitimate interest and:

- Deliver appropriate services and support to you;
- Keep you informed about the services we provide to you
- Application and registration purposes
- Help manage the planning and spending on, services
- Ensure the quality and safeguard services;
- Ensure registered services meet regulatory training requirements (in particular in relation to the Regulation and Inspection of Social Care (Wales) Act 2016, Fostering Services [Wales] Regulations 2003 and the associated National Minimum Standards).
- Help investigate any worries or complaints you have about the services; and
- Provide statistical information, as required, to Social Care Wales and Welsh Government

#### **5) Special categories of personal data:**

For the purposes of application and registration, the ODT collect and process information which can include 'special categories' of data including:

- Race
- Ethnic Origin
- Disability

#### **We can process this category of data because:**

The data subject gave explicit consent

#### **6) Who has access to your data?**

**Your information may be shared internally with:**

- The Commissioning Unit, Social Care & Housing
- The Family Placement Team, Social Care & Housing (Foster Carers only)
- Senior Management Teams, Social Care & Housing
- Human Resources and Employee Services

Your data may be shared internally with members of the HR and Employee Services teams (including Payroll), your line manager, managers in the business area in which you work and IT staff if access to the data is necessary for performance of their roles. Your data may also be shared with third parties who provide in-house training courses.

**Your information may be shared externally with:**

- Other Local Authority Workforce Development Teams
- Assessment Centre and Awarding Body
- External Training Providers
- HEI
- FEI
- Social Care Wales

**The Council shares your data with third parties because** (please explain

- Application and Registration purposes (Qualifications)
- Access to external courses and events
- Access to other learning and development opportunities

**Is the Data transferred out of the EEA?**

Yes

(The WDT uses Administrate to provide the secure CRM and LMS. Some of Administrate's data is transferred out of the EEA for certain third party sub-processes, i.e. automated email sending. These providers are bound contractually to the same standards Administrate must maintain for processing the data in line with GDPR and US Privacy Shield Framework).

**7) How does the Council protect data?**

The Council has internal policies in place to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. Furthermore data is not accessed by employees except in the performance of their duties.

Where the Council engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

### **8) How long does the Council keep your data?**

The Council will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. We will keep your information in line with our Local Authority retention schedules, as below:

- Adoption 100 Years
- Looked After Children 75 Years
- Safeguarding Children 35 Years
- Safeguarding Adults 15 Years
- Care and Support (part 4) 10 Years
- Foster Carers 75 Years
- Statutory Supervision 25 Years
- Adults with/without disabilities 8 Years
- Older Persons 8 Years
- Occupational Therapy 8 Years
- Community Meals 6 Years
- Mental Health 10 Years
- Grants 8 Years
- Residential Home files 25 Years

### **9) Are we making automated decisions/profiling with your data?**

No

### **Your rights**

You have a number of rights you can exercise:

- access and obtain a copy of your data on request
- require the Council to change incorrect or incomplete data
- under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- to know the period of time that the data will be stored for
- the right to data portability
- the right to withdraw your consent at any time

- the right to lodge a complaint with a supervisory authority (Information Commissioners Office)
- the consequences of if you fail to provide data to the Council
- the existence of and automated decision-making, including profiling and the consequences of this for you.

If you would like to exercise any of these rights, please contact: the Organisational Development Team Manager at [socialservices.trainingadmin@torfaen.gov.uk](mailto:socialservices.trainingadmin@torfaen.gov.uk)

## DOCUMENT CONTROL

*Remove before sharing document*

<b>Title:</b>	<b>TEMPLATE – Privacy Notice</b>		
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## REVISION HISTORY

<b>Issue Date</b>	<b>Version / Status</b>	<b>Reason for Change</b>	<b>Changed By:</b>
November 2019	1.0 Live	Form created to achieve GDPR Compliance	Jane Smith