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Service Area: Corporate Information Governance Unit
Work Area: Customer and Digital Services
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Privacy Notice Name: Corporate Information Governance Unit – Staff and Elected Member Training
Description of Privacy Notice: This Privacy Notice will explain how Caerphilly County Borough Council (CCBC) will use the information the Corporate Information Governance Unit (CIGU) collects in respect of Information Governance training.

How we will use your information

Purpose and legal basis for using your information

Purpose of processing

Information Governance covers all aspects of handling information, including;

- responding to requests under the Freedom of Information Act (FOI) and Environmental Information Regulations (EIR);
- managing personal data to comply with the Data Protection legislation,
- controlling information risk and
- effective records management.

The Corporate Information Governance Unit (CIGU) provides training and information in respect of the above for both CCBC staff and elected members, and so may record the following information about you:

Category of Information	Purpose of Processing
Your name, directorate/ service area, staff number and work contact details	For the purpose of identifying you.
Details of training courses that you have been booked to attend, together with your attendance / non-attendance.	For the purpose of demonstrating that training has been provided and to chase those who have not attended.
Any feedback forms or equality monitoring forms you have completed in respect of our training.	For the purpose of improving the content of courses offered / equality monitoring purposes.
Any knowledge tests you have completed / not completed and the results.	For the purpose of demonstrating your understanding of the course content that the knowledge test relates to and improving course content.

Corporate Governance Messages sent and your understanding declaration / other response.	For the purpose of demonstrating vital information governance information has been provided and understood.
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Legal basis for processing

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified, which is outlined below:

Article 6 1f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. If any information falls within the definition of special category personal data (e.g. equalities information), then an additional condition from Article 9 of the Regulations must be identified, as outlined below:

- (1) This condition is met if the processing—
 - (a) is of a specified category of personal data, and
 - (b) is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained, subject to the exceptions in subparagraphs (3) to (5).

Who will have access to your information

Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones
 Corporate Information Governance Manager / Data Protection Officer
 Email: dataprotection@caerphilly.gov.uk
 Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

Details of main users of your information

The main user of your information will be the Corporate Information Governance Unit (CIGU).

For members of staff, information will be also be used by the relevant directorate / service area and non-completion of training / knowledge tests may result in action being taken by your service area.

For elected members, the information will also be used by Legal Services and Governance and non-completion of training / knowledge tests may be reported to the Standards Committee.

Knowledge test results and attendance of training courses may be added to individual's electronic Human Resource file (iTrent) by People Services.

Details of any sharing of your information with other organisations

We will not share your information with others unless there is a need to do so, examples include:

- Information Commissioners Office (ICO) – should you be responsible for a data protection breach or an offence under information governance legislation we may need to share your information governance training, so a determination can be made if the breach was a result of inadequate training.
- the courts - should action be taken by an individual through the court system for breach of data protection legislation / request for compensation, if you are responsible for the data protection breach, your information governance training record may need to be shared with the courts in order to defend the action being taken against CCBC.

Requests for information

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

How long will we retain your information

Details of retention period

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice.

Training completed and knowledge test results up to 25 years (Limitation Act 1980)

Your Rights (Inc Complaints Procedure)

Your rights under the Data Protection

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: www.ico.org.uk.

To enact your rights please contact the service area detailed on the top of this form.

Complaints Procedure

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints

Summary Privacy Notice

How we will use your information

The Corporate Information Governance Unit (CIGU) provides training and information in respect of both CCBC staff and elected members, and so may record the information governance training completed and knowledge test results for the purpose of demonstrating relevant training has been provided and that you have understood this training. We may also record equalities monitoring information for the purposes of equalities monitoring and training course feedback for the purpose of improving the content of courses offered.

The legal basis for recorded the above information is legitimate interest and the information may be held for up to 25 years. We may share your training record with others outside of CCBC where there is a need to do so, such as defending CCBC against action by the Information Commissioners Office or the Courts.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights please click the following link: