



Employee Privacy Notice

Introduction

This privacy notice is designed to help you understand how Coleg Gwent (“The College”, “we”, “us”) collect and process the information that you share with us.

The General Data Protection Regulation (GDPR) and Data Protection Act (2018) together replaced The Data Protection Act 1998 on 25 May 2018. We are providing this privacy notice in compliance with this new legislation.

Who is the Data Controller?

The Data Controller of the information we collect about you is Coleg Gwent, Usk Campus, Usk, Monmouthshire, NP15 1XJ. We have designated representatives on behalf of the College. These are the Principal, the 2 Vice Principals and our Direct of Estates and Facilities.

The College also has a Data Protection Officer, who can be contacted on DPO@colegwent.ac.uk.

Why do we collect your data and the legal grounds for doing so?

Data collected by the College relating to its employees is to enable the administration and management of the employment contract.

The Law says we can only collect or process your data if there is a legal basis to do so. The legal bases on which the Group relies to process all types of personal data include:

- to fulfil a contract we have with you
- when we have a legal obligation
- where it is in the public interest
- where you have given your consent, although this is also necessary in a limited number of circumstances

There are additional provisions in the legislation that enable us to process personal data that is known as special category personal data. This includes your racial or ethnic origin, your political opinions, your religious or philosophical beliefs, your trade union membership, your genetic or biometric data, your health, your sex life and sexual orientation and any criminal convictions and offences.

Reason for processing	Legal Basis
to ensure payment of salary	Contractual obligations
To ensure pension payments are made	Legal obligation
To ensure tax deductions are made	Legal obligation
For trips and visits	Contractual obligations
To ensure technical support for the college systems	Contractual obligations
to provide occupational health services/counselling services	Legal and contractual obligations
to support the health, safety and wellbeing of staff	Legal obligations and public interest
to provide IT support for PCs and laptops	Public interest
for insurance purposes	Legal obligations and public interest
To use your photographs in promotional material for the group	Consent
to enable staff access to childcare vouchers	Contractual obligations
To ensure dignity in the workplace, fairness and equality	Legal obligations under employment law and social protection law and public interest
To ensure sickness pay	Contractual obligations
To provide annual leave entitlements	Contractual obligations
run recruitment and promotion processes	Contractual obligations
maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;	Contractual obligations, legal obligations and public interest
operate and keep a record of disciplinary and grievance processes	Legal obligations and public interest
operate and keep a record of employee performance and related processes	Legal obligations and public interest
operate and keep a record of absence and absence management procedure	Legal obligations including health and safety reasons, employment law and social protection law and public interest
obtain occupational health advice	Legal requirement and consent
operate and keep a record of other types of leave	Legal obligations and public interest
ensure effective general HR and business administration	Contractual obligations, legal obligations, public interest
provide references on request for current or former employees	Legal obligations and public interest
respond to and defend against legal claims	Legal obligations and the establishment, exercise or defence of legal claims

We also have a contractual obligation to share your information with other third parties, including HRMC, Pension firms and local authorities. A full list of our third parties and how we share your data can be found in the next section.

The Group also has a legal obligation to collect some of your data including for health and safety and financial reasons.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

We process special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, for the purposes of equal opportunities monitoring.

We may also carry out monitoring of e-mails or internet usage as set out in our Information Security Framework

What information do we collect?

- Your name, address and contact details (including e-mail and telephone number), date of birth and gender;
- The terms and conditions of your employment
- Details of your qualifications, skills, experience and employment history
- Information about your remuneration, including entitlements to benefits such as job seekers allowance, pensions or insurance cover
- Details of your bank account and national insurance number
- Information on your marital status, next of kin, dependents and emergency contacts
- Information about your nationality and entitlement to study/work in the UK
- Information about your criminal record and unspent convictions
- Details of your schedule (days of work and working hours) and attendance at work
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the Group needs to make reasonable adjustments; and
- equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief.
- Electronic activity as set out in the information security framework

Members of the HR team and managers also often learn personal information about their employees in the course of dealing with employment matters. This can include illness, religious background, sexual orientation, family situations. Please rest assured that any information of this nature that you consider to be confidential which you share with your manager and HR will be treated with the upmost sensitivity.

Where do we collect your data from?

We collect your information from various sources including:

- directly from you
- your previous employer
- benefits office
- information that we generate in the course of considering your application of employment
- information that we generate while you are employed by us. This may be generated centrally within HR or this may be generated by your managers or colleagues
- social services / local county borough council
- your IP address via cookie consent on our website (For more information visit www.coleggwent.ac.uk/cookies)
- HMRC and pension companies
- Referees
- employment background check providers
- information from credit reference agencies
- Information from criminal records checks permitted by law.
- CCTV footage from onsite cameras
- Photographs from college events
- Occupational health/counselling services

How long do we keep your data?

Our complete retention schedule is available on request.

The main retention dates are:

RECORD TYPE	LENGTH OF RETENTION
Staff application forms/CVs	Current year + 6 years
Professional training booking forms	Current year + 6 years
Photography consent forms	Current year + 6 years
Financial information documents	Current financial year + 6 years
Client record details	Current year + 6 years
Staff Disciplinary paperwork	Last action on case + 6 years

Who do we share your data with?

If you are in an external facing role, information about you may be shared with any third parties with whom we are working or with whom we have a relationship. This will be limited to work-related information and information about you which describes your professional position.

The Group needs, however, to process private information about you to meet our obligations under your employment contract. For example, the Group will share your information with the pension agency to ensure payments are made correctly.

Our Third Party List

The Group partners with a number of third parties with whom we share data. We do not use any third party located outside of the EU and all data storage is also held within the EU.

Category of sharing	Why we share
Auditors	to test and monitor the group's activities to ensure compliance
DVLA	to ensure staff are eligible to drive college vehicles
Government and associated organisations	We send data to government organisations in order to gain funding, to enable teaching and learning, to support learners and potential learners, to comply with legal requirements such as tax payments of our staff
Insurance	To ensure the college is suitably insured to make it a safe environment
Pension organisations	Legal requirement in order to pay staff pension contributions
Service provider - marketing	To provide individuals with news and events from the group
Service Provider - hardware	To enable staff and learners to have an efficient service when using the group's facilities
Service provider - IT support	To enable staff and learners to have an efficient service when using the group's facilities
service provider - salary sacrifice	to provide employee benefits
Service Provider - software	To enable staff and learners to have an efficient service when using the group's facilities
service provider - telephone system	To enable staff and learners to have an efficient service when using the group's facilities
Service Provider - transport	for trips and visits
Staff Recruitment	to ensure an effective recruitment process

Statistical analysis	To provide information in the public interest related to the group's performance
Trade unions	to provide union services to our staff
Educational organisation (schools, universities, colleges)	to enable teaching, learning & funding for learners
Service Provider - cleaning services	salary purposes
Archive facilities	to securely store paper-based documents containing personal data
Service Provider - customer services	To ensure a professional service when contacting the group
Legal organisations (solicitors, police, courts)	to support the safety of learners and staff, for court proceedings and to gain legal advice
Employer/Training provider/Work Placement provider	to enable teaching, learning & funding for learners
Staff Welfare services	to ensure the health and wellbeing of the group's staff

The college's website may contain links to other websites of our partner networks, advertisers and affiliates. If you follow a link to these websites, please note that they have their own privacy notices and policies. The College does not accept responsibility or liability for these notices and policies. Please check their policies before you submit any personal data to these websites.

Does the Group rely on automated decision making?

The Group does not use automated decision making currently.

How do we protect your data?

The group takes the security of your data seriously. It has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

We will only share information internally with staff that require this information in order to fulfil their line management duties or to provide you with the tools you require in order to perform your contract. Special category and sensitive data provided to the group will be securely stored with limited access to the HR team and occasionally other members of staff that require the information to provide you with support and equipment.

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

All staff are required to take data protection training on an annual basis.

What are your rights?

You have a number of rights under the GDPR.

This includes the right to seek the rectification or erasure of your personal data or to restrict and to object to the processing of your personal data.

You are also entitled to a copy of the data held about you, and to data portability.

Where we are processing your data, based on your consent, you also have a right to withdraw your consent to sharing data with us at any point. The Group is entitled to retain data that we are processing other legal bases though to satisfy our statutory and contractual obligations outlined above.

Requests of this nature can be made in several ways:

1. Contact the Data Protection Officer by e-mailing DPO@coleggwent.ac.uk
2. By completing a data protection enquiry form on the website.
3. By completing a subject access request form available on the privacy page of the website and posting to:

The Data Protection Officer
Coleg Gwent
Crosskeys Campus
Risca Road
Crosskeys
Caerphilly
NP11 7ZA

If you feel that we have not dealt with your data in accordance with this privacy notice or in the event of any other complaint, you are able to forward your concerns to the Information Commissioner's Office (The ICO).

Changes to the way we process your data

This privacy notice may be updated from time to time.