

## **North Wales Fire and Rescue Service Employee Privacy Notice**

North Wales Fire and Rescue Service (NWFRS) collects, processes and stores personal data relating to its employees in order to manage employment relationships. NWFRS is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This document provides the key information employees need regarding their data privacy and protection, however, any further queries can be directed to the Service's Data Protection Officer:

**Data Protection Officer, North Wales Fire and Rescue Service Headquarters, Ffordd Salesbury, St Asaph Business Park, St Asaph LL17 0JJ. Tel: 01745 535250. Email: [dpo@northwalesfire.gov.wales](mailto:dpo@northwalesfire.gov.wales)**

### **What personal data does NWFRS process and how?**

Information processed includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender identity;
- the terms and conditions of your employment;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with NWFRS;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- details of your bank account and national insurance number;
- information about your marital status, next of kin, dependants and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- any criminal record information;
- any public presence you may have on social media;
- 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, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which NWFRS may need to make reasonable adjustments; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief etc.

NWFRS collects this information in a variety of ways. For example, data is collected via online and paper based application forms, from documents provided to confirm your identity and your right to work in the UK (such as passports and driving licences); from forms completed by you at the start of or during your employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments, and occasionally from information you post publicly on social media or information you post within a private social media network that is forwarded to us. NWFRS will investigate any concerns regarding social media presence and potential conflicts with our Core Values and will not make recruitment decisions based on social media presence alone.

NWFRS may also record interviews, meetings or other assessments as the most appropriate way to retain information about the discussions that take place, to enable minute takers to fulfil their task or to enable meeting participants (or non-attendees) to access a recording of a meeting. In addition, all calls made to Control for any reason are also audio recorded for the purpose of retaining information about the call; this includes calls made by employees in relation to undertaking work activities as well as reporting of events or situations relating to you personally.

In some cases, NWFRS collects personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

### **Why does NWFRS process personal data?**

NWFRS needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit and pension entitlements.

In some cases, NWFRS needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled. Disclosure and Barring (DBS) checks are undertaken for all roles within NWFRS and routine renewals are undertaken every three years to ensure that NWFRS maintain a safe and secure working environment for both our employees and the communities we serve. For certain positions, it is necessary to carry out enhanced criminal records checks or vetting to ensure that individuals are permitted to undertake the role in question.

In other cases, NWFRS has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows NWFRS to:

- run recruitment and promotion processes;
- 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;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that NWFRS complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and

- maintain and promote equality in the workplace in various ways including Job Evaluation.

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

Where NWFRS processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring and government reporting.

NWFRS may also need to process data from job applicants to respond to and defend against legal claims.

### **Who has access to personal data?**

Your information will be shared internally with staff from the HR Department. When and where appropriate, some information will be shared with the Finance Department, your Line Manager and other Managers within relevant business areas who need it to undertake their role. Key ICT staff have access to data as necessary for the performance of their roles. Controls are in place to ensure staff only have access to the information relevant to their role.

NWFRS shares your data with third parties in order to obtain pre-employment references from other employers, to obtain employment background checks from third-party providers and to obtain necessary criminal records checks from the Disclosure and Barring Service.

NWFRS may also share your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services. Agreements are in place before your data is shared to ensure your data is given an adequate level of protection.

NWFRS is entitled to share special category personal data when it is necessary for the establishment, exercise or defence of legal claims. NWFRS may share information with our legal advisors and external investigators in order to fulfil this requirement.

In order to fulfil our legal obligations, or in the interest of public safety, we may share your information with other organisations such as:

- the police or other law enforcement agencies
- the NHS or other health and welfare organisations
- the relevant local authority
- other partners such as Natural Resources Wales or utility companies
- insurance companies
- courts, including the coroner's office
- financial organisations
- educational establishments
- Welsh Government
- Auditors

NWFRS will not transfer your data outside the European Economic Area.

### **How does NWFRS protect personal data?**

NWFRS takes the security of your data seriously. NWFRS 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. Where NWFRS 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.

### **How and for how long does NWFRS store personal data?**

Data is stored in a range of different places, including in your personnel file, in NWFRS's HR management systems and in other IT systems (including NWFRS's email system).

NWFRS will hold your personal data in compliance with legislation, but the minimum term will be for the duration of your employment relationship.

In relation to Disclosure and Barring Service checks, once a recruitment (or other relevant employment) decision has been made, NWFRS will not keep certificate information for any longer than is necessary, usually for no more than six months. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Recordings made in the course of employment meetings will be stored securely within HR IT systems and will be kept for no longer than 6 months or until the relevant processes and deadlines have been completed. Thereafter, they will be securely and confidentially destroyed.

Audio recordings of communication with Control will be stored securely within Control IT systems and retained for 10 years, thereafter they will be securely and confidentially destroyed.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require NWFRS to change incorrect or incomplete data;
- require NWFRS to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where NWFRS is relying on its legitimate interests as the legal ground for processing; and
- ask NWFRS to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override NWFRS's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Data Protection Officer by emailing: [dpo@northwalesfire.gov.wales](mailto:dpo@northwalesfire.gov.wales).

If you believe that NWFRS has not complied with your data protection rights, you can raise any concerns you may have to the Information Commissioner, contact details for which can be found on the ICO website: [www.ico.org.uk](http://www.ico.org.uk)

**You have some obligations under your employment contract to provide NWFRS with data, failing to provide requested data will hinder NWFRS's ability to administer the rights and obligations arising as a result of an employment relationship efficiently.**