



SLIGO
COUNTY COUNCIL
COMHAIRLE CHONTAE SHLIGIGH

Privacy Statement
Human Resources Department

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1.0 Introduction

Sligo County Council seeks to promote the economic, social and cultural development of County Sligo and in doing so, contribute significantly to improving the quality of life of the people of County Sligo.

The delivery of high quality services, tailored to meet the needs of all our customers, remains one of Sligo County Council's core objectives and is included in our Corporate Plan. This quality service includes not only the level and quality of service given to our customers, but also the quality of our decision-making processes, the efficiency and effectiveness of our corporate operations, standard of our facilities and our ability to adapt in an ever-changing environment.

In order to provide the most effective and targeted range of services to meet the needs of the citizens, communities and businesses of County Sligo, we will be required to collect, process and use certain types of information about people and organisations. Depending on the service being sought or provided, the information sought may include 'personal data' as defined by the Data Protection Acts and by the General Data Protection Regulation (GDPR) and may relate to current, past and future service users; past; current and prospective employees; suppliers; and members of the public who may engage in communications with our staff. In addition, staff may be required, from time to time, to collect, process and use certain types of personal data to comply with regulatory or legislative requirements.

The role of the Human Resources (HR) Department is to support Sligo County Council's ongoing commitment to the delivery of a quality service to its customers. It achieves this through the provision of the following services/functions that are designed to attract, develop and retain a dedicated and highly qualified workforce:

- HR Administration
- Attendance Management
- Industrial/Employee Relations
- Integrated Performance Management
- Payroll

- Recruitment and Selection
- Garda Vetting
- Superannuation
- Training and Development
- Miscellaneous HR functions.

2.0 Purpose of Privacy Statement

The purpose of this privacy statement is to describe, in clear and concise terms, the personal data the HR Department may collect about individuals, why it is needed, how it is used and how individuals may interact with the HR Department in relation to their personal data. It also outlines the rights of individuals under data protection legislation in relation to the processing of their personal data.

3.0 Definitions

For the purposes of this privacy statement the following definitions apply:

- **Data Subject:** is an individual who is the subject of personal data.
- **Personal Data:** any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Special Categories of Personal Data:** is personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; genetic data; biometric data processed for the purpose of uniquely identifying a natural person; data concerning health and data concerning a natural person's sex life or sexual orientation.

4.0 Scope

This statement applies to all personal data processed by the HR Department in physical or electronic format. This data primarily relates to past, current and prospective employees of the County Council.

5.0 Data Protection Policy

The HR Department processes a significant amount of personal data in various formats on an on-going basis. Sligo County Council is committed to ensuring that personal data processed by its HR Department is:

- Obtained lawfully, fairly and in a transparent manner;
- Obtained for specified, explicit and legitimate purposes only;
- Adequate, relevant and limited to what is necessary for purpose for which it was obtained;
- Recorded, stored accurately and securely and where necessary, kept up to date;
- Kept only for as long as is necessary for the purposes for which it was obtained;
- Kept in a form which permits identification of the data subject;
- Processed in a manner that ensures the appropriate security of the personal data including protection against unauthorised or unlawful processing.

Sligo County Council has a Corporate Data Protection Policy which goes in to more detail as to how it intends meeting these commitments. A copy of this document can be accessed here <https://www.sligococo.ie/gdpr/> .

6.0 What Personal Data is Processed

Details of personal data processed by each of the services/functions of the HR Department are contained in the following tables:

Table 6.1	
Service/Function	Personal Data Processed
HR Administration	<ul style="list-style-type: none">• Name

	<ul style="list-style-type: none"> • Postal address • Eircode/Postcode • Contact details (phone numbers, e-mail address) • Gender • Date of birth • Civil status • Nationality • PPS number • Photo identification • Personnel number • Grade • Date of commencement of employment • Date of commencement of permanency • Work location details • Work pattern • Pensionable status • Retirement date • Next of kin
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Table 6.2	
Service/Function	Personal Data Processed
Attendance Management	<ul style="list-style-type: none"> • Work attendances/hours worked • Work absences (e.g. business absences) • Leave (e.g. adoptive, annual, ante-natal appointments and classes, carers, parental, compassionate, conferring, exam, flexi, force majeure, interview, interview board, jury, maternity, paternity, parents, reserve defence force, sick, special paid, special unpaid, study, shorter working year, training and union leave, Toil, Toilbh, Covid 19 Speical leave paid, H&S Leave.) • Career break

	<ul style="list-style-type: none"> • Time off in lieu of overtime • Work sharing scheme arrangements • Balances (leave, flexi and uncertified sick leave) • Occupational Health medicals • Medical details
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Table 6.3	
Service/Function	Personal Data Processed
Industrial/Employee Relations	<ul style="list-style-type: none"> • Nature of claims, grievances and complaints • Conduct and outcome of negotiations • Conduct and outcome of investigations

Table 6.4	
Service/Function	Personal Data Processed
Performance Management Development	<ul style="list-style-type: none"> • Performance data (tasks, targets, timeframes and progress) • Training and development needs

Table 6.5	
Service/Function	Personal Data Processed
Payroll	<ul style="list-style-type: none"> • Salaries/wages/pensions data • Allowances data • Tax deductions data • Pension related deductions data • Payroll deductions data (e.g. life assurance, income protection, additional voluntary contributions, trade

	union subscriptions, membership fees for professional bodies and miscellaneous voluntary deductions) <ul style="list-style-type: none"> • Bank account details
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Table 6.6	
Service/Function	Personal Data Processed
Recruitment and Selection	<ul style="list-style-type: none"> • Name • Postal address • Eircode/Postcode • Contact details (phone numbers, e-mail address) • PPS number • Position applied for • General education • Academic/professional/technical/other qualifications • Membership of professional institutions • Previous employment history • Period of notice (for existing employment) • Additional data that job applicants opt to provide • Medical reports • Occupational Health Medicals • References • Contracts of employment

Table 6.7	
Service/Function	Personal Data Processed
Garda Vetting	<ul style="list-style-type: none"> • Name • Postal addresses (current and previous) • Contact details (phone numbers, e-mail address) • Date of birth • Place of birth

	<ul style="list-style-type: none"> • Passport number • Details of convictions
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Table 6.8	
Service/Function	Personal Data Processed
Superannuation	<ul style="list-style-type: none"> • Commencement of employment data • Service history • Termination of employment data • Pension and gratuity data • Records of contributions owed • Death Gratuity • Spouses / Children's Pension

Table 6.9	
Service/Function	Personal Data Processed
Training and Development	<ul style="list-style-type: none"> • Training and development data (training and development scheduled, completed, assessments, qualifications and non-attendances at training and development)

Table 6.10: Miscellaneous HR Functions	
Service/Function	Personal Data Processed
a) Access Cards	<ul style="list-style-type: none"> • Name

	<ul style="list-style-type: none"> • Grade • Badge Number • Photo identification
b) Cycle to Work Scheme	<ul style="list-style-type: none"> • Name • Personnel number • Grade • PPS number • Work location • Salary/wages deductions
c) Payments to Suppliers	<ul style="list-style-type: none"> • Name • Postal address • Contact details (phone numbers, e-mail address) • Bank details • Category of supplier • VAT/TRN/PPS number • Tax clearance details • Payment details

7.0 Why Personal Data is Processed

Personal data is processed by the HR Department in order to manage the relationship with past, current and prospective employees in a lawful, effective and appropriate manner.

If the HR Department proposes to process personal data for a purpose other than it was obtained, it will, prior to such processing, provide the data subject with information on that purpose and any other relevant information.

8.0 The Legal Basis for Processing Personal Data

The legal basis for processing personal data by the HR Department is mostly contained in legislation and as such, Sligo County Council processes the data in order to comply with a legal

obligation. In addition, processing may be necessary in order to satisfy the contract of employment and in this case, the legal basis is contractual necessity.

There may be a limited number of circumstances whereby the HR Department relies on consent for the processing of personal data. In such circumstances, the data subject has the right to withdraw consent to the processing of his or her personal data at any time.

Where special categories of information are being processed, the HR Department will obtain the data subject's explicit consent to such processing unless this is not required by law or the personal data is required to protect the health of the data subject in an emergency.

9.0 How Personal Data is Obtained

9.1 Most of the personal data collected by the HR Department is obtained directly from past, current and prospective employees. Some of it however is obtained indirectly from other sources such as referees, medical practitioners and previous employers.

9.2 The HR Department also creates personal data as a result of processing activities carried out by the services it provides e.g. attendance, payroll, service, performance and training and development data.

10.0 How Personal Data is Processed

The processing of personal data by staff within the HR Department is generally carried out by its IT systems. Details of the IT systems that are used by the HR Department to process personal data are as follows:

- CORE HR, Payroll and Superannuation System
- MyPay (the local authority payroll and superannuation shared service).

11.0 Sharing Personal Data with Third Parties

The sharing of personal data with third parties will only occur in circumstances that are permitted by law.

Details of the sharing of personal data by the HR Department with third parties are contained in the following tables:

Table 11.1	
Service/Function	Third Parties with whom Personal Data is Shared
HR Administration	<ul style="list-style-type: none"> • None

Table 11.2	
Service/Function	Third Parties with whom Personal Data is Shared
Attendance Management	<ul style="list-style-type: none"> • Occupational health physician

Table 11.3	
Service/Function	Third Parties with whom Personal Data is Shared
Industrial/Employee Relations	<ul style="list-style-type: none"> • Employee representatives • Employer representatives

Table 11.4	
Service/Function	Third Parties with whom Personal Data is Shared
Performance Management Development	<ul style="list-style-type: none"> • None

Table 11.5	
Service/Function	Third Parties with whom Personal Data is Shared
Payroll	<ul style="list-style-type: none"> • Laois County Council (MyPay) • Revenue Commissioners • Insurance companies • Trade unions • Banks

	<ul style="list-style-type: none"> • Professional bodies • Auditors
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Table 11.6	
Service/Function	Third Parties with whom Personal Data is Shared
Recruitment and Selection	<ul style="list-style-type: none"> • Testing companies as relevant • Shortlisting/Interview boards • Occupational Health Specialist • Referees

Table 11.7	
Service/Function	Third Parties with whom Personal Data is Shared
Garda Vetting	<ul style="list-style-type: none"> • An Garda Síochána

Table 11.8	
Service/Function	Third Parties with whom Personal Data is Shared
Superannuation	<ul style="list-style-type: none"> • Laois County Council (MyPay data) • Other local authorities (Service history only)

Table 11.9	
Service/Function	Third Parties with whom Personal Data is Shared –
Training and Development	<ul style="list-style-type: none"> • Stranorlar Regional Training Centre • Training providers • Training and education awards bodies

Table 11.10: Miscellaneous HR Functions	
Service/Function	Third Parties with whom Personal Data is Shared
a) Access Cards	<ul style="list-style-type: none"> • None

b) Cycle to Work Scheme	<ul style="list-style-type: none"> • None
c) Payments to Suppliers	<ul style="list-style-type: none"> • None

12.0 Records Retention Policy

The HR Department's practices in relation to the retention of personal data are guided by the Local Government Management Agency's (LGMA) National Retention Policy for Local Authority Records and any updates that are issued by the LGMA.

13.0 Data Subject Rights

Data subjects have a range of rights under GDPR. These include the following:

- The right to be informed;
- The right of access;
- Right to rectification of inaccurate or incomplete data;
- The right to erasure (also known as the 'right to be forgotten') of personal data;
- The right to portability;
- The right to object to the processing of personal data;
- The right to restrict the processing of personal data;
- Rights in relation to automated decision making, including profiling.

14.0: Complaints to the Data Protection Commission

14.1 Data subjects may make a complaint in the following circumstances:

- a) If they experience a delay outside of the prescribed timeframe for making a decision on a data subject right request;
- b) If they are dissatisfied with a decision by Sligo County Council on their data subject right request;
- c) If they consider that Sligo County Council's processing of their personal data is contrary to data protection legislation.

14.2 Contact details for the Data Protection Commission are as follows:

Phone Number: 0761 104 800 or Local 1890 252 231
E-mail: info@dataprotection.ie
Website: www.dataprotection.ie
Postal Address: Data Protection Commission
Canal House
Station Road
Portarlinton
Co. Laois
R32 AP23.

15.0 Monitoring and Review

Provisions contained in this statement shall be subject to on-going monitoring and review.

16.0: Further Information

Further information and advice on the operation of this privacy statement is available from the Data Protection Officer, Sligo County Council. Contact details for the County Council's Data Protection Officer are as follows:

Phone: 071 911 1301
E-mail: dpofficer@sligococo.ie
Website: www.sligococo.ie
Postal Address: Sligo County Council
County Hall,
Riverside,
Sligo
F91 Y763