

Fair Processing / Privacy Notice – Careers Guernsey

What we do

Careers Guernsey provide free, impartial career information, advice and guidance to people of all ages in Guernsey and Alderney and operates within the Committee *for* Education, Sport and Culture. The Committee *for* Education, Sport & Culture is the registered data controller for all activities summarised within this notice.

Careers Guernsey's public duty to provide a careers service and its associated support comes from the Education (Guernsey) Law, 1970 with the Education Committee approval to an all age service provision in 2012.

Careers Guernsey work with schools/Post-16 to support the delivery of their careers programmes to meet the Gatsby Benchmarks and to provide impartial careers advice and guidance to students. Careers Guernsey provide free, impartial career information, advice and guidance to all ages including education leavers entering the job market, returners to work, career changers, unemployed and university students. Careers Guernsey provide reliable careers and labour market information and resources to help inform decision making and increase awareness of opportunity. Any person can access Careers Guernsey services and information and contact details are available on www.careers.gg

Careers Guernsey help advise on curriculum, strategy and policies within Education, Economic Development and the States of Guernsey to help ensure people are supported and prepared for their career management as well as supporting the Guernsey economy.

Careers Guernsey work closely with employers and training providers and co-ordinate Guernsey Work Experience (GWEx) and Work-Related Learning for schools and employers as well as organising annual careers showcase events for the island to support raising aspirations and opportunity awareness.

Careers Guernsey aims to encourage and guide people of all ages and abilities to realise and fulfil their potential, develop career management skills and enter sustainable and realistic opportunities.

1. About this notice

This Fair Processing Notice explains how Careers Guernsey uses the personal data of parents/carers, pupils, adults and young people. Please read it carefully and if you have any questions regarding your personal data, or its use, please contact us directly or speak to our Data Protection Officer.

What do we mean by personal data?

‘Personal data’ has a very broad legal definition, it is: *‘any information relating to an identified or identifiable [living] individual’*.

The scope of what ‘personal data’ is expands even further when you consider that it includes both factual information about people as well as opinions expressed about people. It also includes anonymised data that could identify people if it was combined with other information.

What is processing?

Throughout this notice, we refer to the term ‘processing’. In terms of personal data, this means any action that is performed on the data; examples of processing include:

- Collection
- Recording
- Organisation
- Structuring
- Storage
- Alteration
- Retrieval
- Consultation
- Use
- Disclosure
- Dissemination
- Restriction
- Erasure
- Destruction

2. The Data Protection Law

Careers Guernsey, acting on behalf of The Committee *for* Education, Sport & Culture (‘the controller’) processes your personal data in line with its core mandate. The controller acknowledges its obligations as per the Data Protection (Bailiwick of Guernsey) Law, 2017 (‘the Law’), which provides a number of requirements in terms of processing activities involving personal data.

The controller acknowledges the general principles of processing, which require that personal data shall:

1. Be processed fairly, lawfully and transparently
2. Be processed for a specified and lawful purpose(s) and must not be further processed in any incompatible manner (Purpose Limitation)
3. Be adequate, relevant and not excessive for those purposes (Minimisation).
4. Be accurate and, where necessary, kept up to date (Accurate)
5. Not be retained for longer than is necessary for the purpose for which it is processed (Storage Limitation)
6. Be processed in a manner that ensures its security appropriately, including protecting against unauthorised or unlawful processing, loss, destruction or damage (Integrity and Confidentiality)

In addition to this, the controller is responsible for ensuring that data is processed in

accordance with the rights of individuals and must be able to demonstrate compliance with the data protection principles (Accountability).

As well as the general principles of processing, the controller acknowledges the rights of the data subject and more information in relation to these can be found by visiting www.gov.gg/DP

3. Contact details

The contact details of the data controller are as follows:

The Committee for Education, Sport & Culture

Tel: 01481 227000

Email: educationsportandculture@gov.gg

Careers Guernsey – acting on behalf of ESC:

Careers Guernsey, Level 4, Sir Charles Frossard House, La Charroterie, St. Peter Port, GY1 1FH

Tel: 01481 226565

Email: careersguernsey@gov.gg

The contact details for the Data Protection Officer for Education, Sport and Culture are as follows:

The Data Protection for Education, Sport & Culture

Tel: 01481 220012

Email: data.protection@gov.gg

4. The types of personal data we collect and use

In order for Careers Guernsey to provide you with the most appropriate careers information, advice and guidance to meet your needs, we may collect the following personal information:

Personal data

- Identity Data: includes your first name, last name, title, date of birth, gender and email address
- Contact Data: includes contact address, email address and telephone numbers
- Education and Career Data: includes details of your skills, qualifications, preferences about your future career, current school/learning provider, your education Unique Pupil Number, current employment or education status, work and life experience.
- Employer feedback about student placements on work experience

Special Category data

- Health information;
- Information concerning any special educational needs that you may have;
- Information about any disability you may have;
- Information about any criminal convictions or offences you may have which may affect your career decisions;
- Religious or philosophical belief (if this was raised by an individual as a consideration for career choice);
- An individual's sex life or sexual orientation (if this was raised by an individual as a consideration for career choice).

5. Why we collect and use personal data

Careers Guernsey use personal data to help you with your career plans and to help you make progress. We also use it to:

- Assist us in improving our face to face and website services as we may contact you for feedback about our services, if you opted into this, using the contact details you have provided to us when you first used our service;
- Support our internal record keeping e.g. how many people under 21 years and over 21 years we have seen in the last month; and to
- Provide information to the States of Guernsey about how Careers Guernsey services are used although the data used for this purpose is completely anonymised.

For security reasons we will not include any personal data about you in any email we send to you. If we are required to send any personal data about you in an email, we will send this securely. We would also suggest that you keep the amount of personal data you send to us via email to a minimum or to send it securely to us. We will check with you if we receive an email from you disclosing personal to ensure we continue our communications with you in a more secure way.

Careers Guernsey maintains that it will only process the personal data which is detailed in section 4 and will not process any further personal data that is not necessary in relation to the original reason for processing unless the controller is required to do so by law.

6. Our Lawful Basis for Processing

The lawful basis for collecting and processing each category of personal data and special category data is dependent upon the specific processing activity in question.

However, under the Law, the lawful bases we rely on for processing (including pupil learning and pastoral care) are:

- The processing is necessary for the exercise of a right, power or duty imposed by law;
- The processing is necessary for the exercise or performance of a public function or task carried out in the public interest by a public authority;
- The processing is necessary for a health or social care purpose;
- The processing is necessary to protect the vital interests of the data subject or other individual;
- Consent (e.g. use of images on social media, use of specific applications); and
- The processing is necessary for the purposes of equal opportunity.

For a full list of our data processing activities, please contact us and we will be happy to provide you with a list of all data processing undertaken and the lawful basis used for each specific processing activity.

7. How we collect data

If you are a student currently in full time education: Either directly from services users or for students still in full time education within the States of Guernsey, from Education services.

If you are a service user who is no longer in full time education: Careers Guernsey collect information from you when you first have contact with our service.

Any personal data that you have made publicly available may be collected e.g. job title on social media/LinkedIn profile for the purposes of education leaver destination records.

Careers Guernsey will ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay. However, service users are expected to keep us informed if their personal data changes while we are working with them e.g. change of address, contact details and/or school or college.

If you believe that any information we hold about you is incorrect or incomplete, please contact Careers Guernsey careersguernsey@gov.gg or Tel: 01481 226565 and we will promptly correct any information which was found to be incorrect.

8. Sharing of personal data

In some circumstances, personal data held by Careers be transferred to another controller within the States of Guernsey or another associated third party.

Careers Guernsey will only share data when there is a lawful basis to do so. We do not transfer data outside of the European Economic Area unless we are satisfied that personal data will be afforded an equivalent level of protection.

Examples of regular data sharing activities are detailed below:

Sharing within the States of Guernsey

- The Committee *for* Health & Social Care: such as mental health and wellbeing services, occupational health, social services etc.;
- The Committee *for* Education Sport & Culture;
- Employment & Social Services;
- Scrutiny Management Committee.

Sharing with external third parties

- Guernsey Employment Trust;
- Business across the Bailiwick;
- Third party system providers and applications: some of our systems are provided by third parties e.g. hosted databases, platforms and cloud storage providers, IT support service.

The States of Guernsey have a professional relationship with a third-party supplier, Agilisys Guernsey Ltd., who provide support to and carry out maintenance on the IT infrastructure of the organisation. For Agilisys to carry out the function they are contracted to provide, there will be instances where they may have sight of your personal data. Careers Guernsey will only provide Agilisys with access to personal data where there is a legitimate and lawful purpose for this access to be given in line with Schedule 2 of the Data Protection (Bailiwick of Guernsey) Law, 2017 and our internal policies and directives.

Disclosure and Safeguarding

Careers Guernsey has a duty of care to you and to the public generally, which we take account of each time you contact us. There may be instances where we become concerned that:

- You may be in danger of harm from others.
- You may be in danger of causing harm to yourself, or to others.

Withholding information you have provided, may prejudice the prevention or detection of crime or an unlawful act, or the apprehension of prosecution of offenders.

In such instances, Careers Guernsey must refer the matter to an appropriate agency e.g. Social Services, Police and will inform clients affected that contact with a referral agency has been made and this processing will always be in line with Schedule 8 (Exceptions and Exemptions) of the Data Protection (Bailiwick of Guernsey) Law, 2017.

For a full list of all instances where your data is shared by Careers Guernsey and the lawful basis we rely on for this sharing, please contact us.

9. Privacy and our website: careers.gg

Careers Guernsey website www.careers.gg does not collect any data, which identifies you personally, without your knowledge.

Cookies

www.careers.gg puts small text files (known as 'cookies') onto your computer to collect information about how you browse this site. The information collected is not personally identifiable. Cookies are used to:

- measure how you use the website, using Google Analytics, so it can be updated and improved based on your needs
- remember the notifications you've seen so that we don't show them to you again

Google Analytics stores information about:

- the pages you visit on careers.gg
- how long you spend on each careers.gg page
- how you got to the site
- what you click on while you're visiting the site

If you do not want this data to be collected when you browse careers.gg, you can check an option to opt-in or opt-out. If you'd like to control cookies used by other sites as well as careers.gg, you can [change the settings on your device](#)

The site also contains links to and from other websites. Usually, you will see a difference in the look of the web pages, flagging that you have gone into another website but if you are unsure, you can check the web address. All the pages within this site start with www.careers.gg, <https://careers.gg> or careers.gg. Other online services and transactions that we link to or from will have a different privacy policy, so if you go to another website from this one, always read the privacy policy on that website to find out what it does with your information.

10. Storage and retention of personal data

In order for Careers Guernsey to provide you with the careers information, advice and guidance services that will best meet your needs, any personal data you provide and any support we provide to you will be recorded on our secure database. As Careers Guernsey is an all-age service (helping you to become better able to manage your career decisions throughout your career) we may need to look back over our prior contact with you to identify the progress you have made, or what may be causing you difficulties in making progress with your plans.

To determine the appropriate retention period for personal data, we consider the amount, nature, sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements. The States of Guernsey Retention & Disposal Schedule Guidance is used to help consider appropriate retention periods.

For further information about the specific retention periods for the personal data Careers Guernsey holds, please contact Careers Guernsey.

11. How we keep your data safe

Careers Guernsey holds any personal data and special category data in electronic format on the States of Guernsey secure server and on the Managed Servelec Client Database (called Core+). This database is hosted and managed by Servelec who have the appropriate ISO security and quality management processing certification. Some data is securely stored in hard copy.

Access to electronic and paper records is tightly controlled. Employees have signed a Declaration of Secrecy and protocols are followed to ensure that employees only have access to areas and documents required to undertake their role and access is monitored.

Careers Guernsey adopts the information security standards of the States of Guernsey.

12. Requesting access to your personal data

Under the Law, you have the right to request access to any personal information we may hold on you. To make a request for your personal information or be given access to your child's careers contact record, contact us directly or speak to our Data Protection Officer, whose contact details are at the top of this notice.

For more information about your rights under the Law, please visit www.gov.gg/DP

13. Withdrawal of consent and the right to lodge a complaint

For any instances where we are processing your personal data with your consent, you have the right to withdraw that consent. If you wish to withdraw your consent, or you are unhappy with our use of your personal data, please let us know by contacting Careers Guernsey or our Data Protection Officer. You also have the right to lodge a complaint about the processing of your data with the Office of The Data Protection Authority, whose contact details are below:

Office of the Data Protection Authority, St Martin's House. Le Bordage, St. Peter Port, Guernsey GY1 1BR.

enquiries@odpa.gg

01481 742074