

Data Protection Policy

(May 2018)

Park Community School

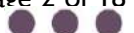
Adopted by PCE Ltd and PCV (Charity)

The purpose of this policy is to set out how the school deals with personal information correctly and securely and in accordance with the GDPR, and other related legislation.

Document Control Table	
Associated Documents	Data Breach Policy Staff IT Policy Complaints Policy
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Contents

Introduction	3
Purpose.....	3
What is Personal Information/data?	3
Data Protection Principles	3
Duties.....	4
Commitment.....	4
Complaints.....	5
Review	5
Contacts.....	5
Appendix 1 – Park Community School Privacy Notice: For those engaged to work or volunteer at the school.....	6
Appendix 2 - Park Community School Privacy Notice for Parents and Students .	10
Appendix 3 – Park Community School Privacy Notice for Clients.....	14
Appendix 4 – Park Community School Privacy Notice for Job Applicants.....	17



Introduction

The school collects and uses personal information (referred to in the General Data Protection Regulation (GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, D. Morris, who may be contacted at dpo@pcs.hants.sch.uk

The school issues Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. [Appendices 1 and 2.] These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information/data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)
3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;

5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Personal data shall be processed in a manner that ensures appropriate security of the personal

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area (EEA), unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The school is committed to maintaining the principles and duties in the GDPR at all times. Therefore, the school will:

- Inform individuals of the identity and contact details of the data controller
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the GDPR provides a reason not to do this.
- If the school plans to transfer personal data outside the EEA, the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information
- Inform individuals of their data subject rights
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept
- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.

- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact the Data Protection Officer, who may be contacted at dpo@pcs.hants.sch.uk

Appendix 1 – Park Community School Privacy Notice: For those engaged to work or volunteer at the school

This document explains how we use school workforce information

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, previous names, employee or teacher number, national insurance number)
- addresses and contact numbers including next of kin
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught) and including pre-employment checks
- relevant medical information
- payroll information, e.g. bank details
- car insurance information [to establish adequate insurance for business purposes]
- DBS (Disclosure and Barring Service) check certificate number and disclosure date

Why we collect and use this information

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- ensure safeguarding of students

The lawful basis on which we process this information

The lawful basis for collecting and using workforce information for general purposes includes, for example:

For personal data:

- performance of a contract with the data subject (member of staff)
- compliance with a legal obligation and/or protection of vital interests e.g. for DBS checks and maintenance of the Single Central Register for student safeguarding.
- performance of public interest tasks, includes educating students on behalf of the Department for Education (DfE) and would therefore include performance management and continuing professional development (CPD) information [note that this, for example, would also come under 'performance of a contract']
- the use of CCTV is also covered by performance of public interest tasks.
- consent would normally only apply to staff photographs/images if used for marketing purposes and to staff business cards.

For special category data (sensitive personal data, including, for example, biometric data):



- necessary and authorised by law for employment obligations
- protect vital interest where consent not feasible
- necessary for establishing, exercising or defence of legal rights
- Substantial public interest
- Explicit consent

(See Article 6 for personal data and Article 9 for special category data from the GDPR-from 25 May 2018) as well as the Education Act 1996 – this information can be found in the guide documents on the following website

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

Storing this information

We hold school workforce data indefinitely in accordance with Local Authority latest current guidelines.

Who we share this information with

We routinely share this information with:

- our local authority (LA)
- the Department for Education (DfE)

Why we share school workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

Local authority

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding/expenditure and the assessment of educational attainment.

We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools, and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005



To find out more about the data collection requirements placed on us by the DfE including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The DfE may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The DfE has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the DfE's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the department: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact dpo@pcs.hants.sch.uk (The Data Protection Officer - D Morris, and the data team)

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the data protection regulations

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Further information

If you would like to discuss anything in this privacy notice, please contact:

D Morris, Data Protection Officer



Appendix 2 - Park Community School Privacy Notice for Parents and Students

This document explains how we use our students' personal information.

Why do we collect and use personal information?

We collect and use personal information:

- To support pupil learning (including with GDPR compliant providers of external online web applications e.g. MyEd, MILK, MyMaths and Educake)
- To monitor and report on pupil progress
- To provide appropriate pastoral care and career guidance
- To assess the quality of our services and how well our school is doing
- For statistical forecasting and planning
- To comply with the law regarding data sharing

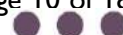
The categories of personal information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address, parent email address and telephone number, emergency contact)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons) and exclusions
- Assessment information
- Modes of travel
- Relevant medical information
- Special educational needs information
- Exclusions / behavioural information
- Post 16 learning information (e.g. destination)
- Looked after child (LAC) status
- Pupil premium status

The General Data Protection Regulation allows us to collect and use pupil information on the following basis: with consent of the individual/parent, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of an individual or another person and where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

When the personal information is Special Category Information we may rely on processing being in the substantial public interest in addition to consent of the individual/parent and the vital interests of the individual or another.

Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Childrens Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010. (See also Article 6 for Personal Data and Article 9 for Special Category Data from the GCPD May 25th 2018)



Most of the personal information you provide to us is mandatory. For example: names, contact details, relevant medical information, special educational needs, attendance information, free school meal eligibility and photographs for use on our management information system (MIS.) Information is also passed on to us from previous schools, including, for example: assessment, attendance and behaviour data. However, some information provided to us is done so on a voluntary basis. To comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this. This is done through the [PCS Parental Consent Policy Document](#), available in hardcopy from reception and online on the MyEd App. Information for which we need your consent includes, for example: biometric data, the taking of students' images for publication e.g. on the school's website and trips where information will need to be passed onto an external company. Where we are using your personal information only on the basis of your consent you may ask us to stop processing this personal information at any time.

Storing personal data

We keep information about students and their parents on computer systems and sometimes on paper.

We hold education records securely and retain them in accordance with the Retention Schedule after which they are destroyed.

Who do we share pupil information with?

We routinely share pupil information with:

- Schools/colleges
- Our local authority (including social services, court and police)
- The Department for Education (DfE)
- NHS (e.g. CAHMS)

Aged 14+ qualifications

For pupils enrolling for post 14 qualifications, the Learning Records Service will give us a pupil's unique learner number (ULN) and may also give us details about the pupil's learning or qualifications

Why we share pupil information

We do not share personal information with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Data collection requirements:

To find out more about the data collection requirements placed on us by the



Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Youth support services

What is different about pupils aged 13+?

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent / guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and



use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact [setting to include contact details of their administrator / Data Protection Officer]

You also have the right, subject to some limitations to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact:

If you would like to discuss anything in this privacy notice, please contact:

dpo@pcs.hants.sch.uk [The Data Protection Officer and team]

Appendix 3 – Park Community School Privacy Notice for Clients

- Park Community Services
- Park Community Enterprises Ltd
- Park Community Ventures
- Park Community Catering

We are committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all clients to whom we provide paid services.

Park Community School is a "data controller" for all the organisations listed above. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. We may amend this notice at any time.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified.

We will collect, store, and use the following categories of personal information about you where applicable:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses, qualifications and public liability insurance cover, membership details and constitutions of organisations.
- Name of child if appropriate e.g. for party bookings
- Bank account details
- CCTV footage

The legal basis for holding this information

The legal basis for holding this information is that it is necessary for us to fulfil the contract we have with you when you are purchasing a service from us and where processing is necessary for the performance of a task carried out in the public



interest or in the exercise of official authority vested in the controller. Where the data is used by us to market products or services to you then we will require your consent [see paragraph below.]

How is your personal information collected?

We collect personal information about your service requirements through Community booking form, PCE order form, club constitutions, certificates and telephone orders, emails and verbally.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you
2. Where we need to comply with a legal obligation
3. Where it is necessary for our legitimate interests (or those of a third party, for example auditors or our insurance companies) and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests)
2. Where it is needed in the public interest or for official purposes

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers.)

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Consent

We would like to be able to keep you up to date with marketing information such as new services that become available and offers that we may wish to make available to you. For this we would need your consent. This is obtained by your completion of the consent section on the booking form / initial enquiry form.

You have the right to withdraw this consent in writing at any time, through emailing PDP@pcs.hants.sch.uk / Bookings@pcs.hants.sch.uk

Data sharing

We may have to share your data with third parties, including third-party service providers, where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. This might include for example auditors or our insurance company or the police. In each

case your interests and fundamental rights do not override those interests. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies and the law. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Security

We have appropriate security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request")
- Request correction of the personal information that we hold about you
- Request erasure of your personal information
- Object to processing of your personal information
- Request the restriction of processing of your personal information
- Request the transfer of your personal information to another party

Contact

For further information about your rights, or if you have any questions about this privacy notice or how we handle your personal information, please contact pdp@pcs.hants.sch.uk / bookings@pdp.sch.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.



Appendix 4 – Park Community School Privacy Notice for Job Applicants

This Privacy Statement is published by Park Community School.

By submitting your application or your CV, you acknowledge having read and understood this Privacy Statement. If you do not wish your information to be used as follows, please do not submit your application or your CV.

This Privacy Statement sets out:

- which personal data we gather in the course of the application and recruiting process;
- how we use your personal data;
- who has access to your personal data;
- how long we keep your personal data;
- how you can access and modify the personal data we collect about you;
- how we secure your personal data;
- how you can submit questions and remarks.

Which personal data do we collect?

This Privacy Statement relates to all personal data that we receive from you and that we collect and process about you in the context of your application and the resulting recruitment process.

These personal data include: identification and contact details, personal characteristics (such as gender and date of birth), education and work experience (including results, certificates, degrees, references), job preferences, financial data (e.g. current and desired salary), all data in your CV and cover letter, all publicly available data from your LinkedIn profile and other social media or public websites, and all other personal data you have provided to us orally or in writing in the context of your application.

How do we use your personal data?

Your personal data will be used in the context of your application and recruitment process, including for:

1. evaluating your skills, qualifications and interests against our career opportunities;
2. checking your data, your references and/or conducting background checks (where applicable);
3. communication concerning the recruitment process and your application;
4. implementing improvements to the organisations' application and recruitment process
5. The processing for the purposes 1, 2 and 3 described above are necessary for a potential employment contract and the processing for purpose 4 is based on the legitimate interest of the organisation to improve its processes on the basis of your application and recruitment procedure.

Who has access to your personal data?

Your personal data can be shared with [Company name] and if needed with other affiliates of [company name]. Within these entities, the following staff members have access to your data:

- staff members of the HR department;



- recruiting manager;
- senior management

In certain cases, technical staff members may have access to your personal data, but only insofar this is necessary to ensure the proper functioning of our technical systems.

The organisation may make use of external service providers or third parties for any of the purposes described above (e.g. recruitment websites or agencies conducting background checks). In such case, access to your personal data will be limited to the purposes described in this Privacy Statement, and in accordance with the requirements of the applicable data protection legislation.

How long do we retain your personal data?

If your application is not successful, we will retain your personal data for a maximum period of 6 months unless we have your explicit consent to hold it for longer.

If your application is successful, your personal data obtained in the context of the application and recruitment procedure will be included your personnel file. You will then be informed separately of how the organisation processes personal data of personnel.

