

3rd Party Building Users Dignity and Respect Survey

Privacy Notice 2024

The Senedd Commission is the data controller of the information you provide, and will ensure it is protected and used in line with data protection legislation.

Our Contact Details

Any queries regarding our use of your information should be sent to the Data Protection Officer at: data.protection@senedd.wales
0300 200 6565

What information are we collecting?

What is the data?

You are not required to provide your name in response to this survey, but some of the answers you provide may include your personal data.

Questions in the survey relate to:

- Your knowledge of how to report inappropriate behaviour and how to access advice and support;
- Whether you have experienced or observed any inappropriate behaviour and what type of behaviour you have experienced or observed;
- Suggestions of improvements to the process;

Please do not name anyone else in response to this survey, or provide any personal information relating to anyone else. Due to the confidential nature of the survey we will not be able to investigate any specific allegations that you make within your answers.

Should any information of a confidential nature be included in the survey this would be passed on to a Contact Officer for review, however please refrain from providing this in your survey response. An opportunity to disclose information in confidence will be given once the survey has been submitted and information will be provided about how respondents can get in touch with Contact Officers.

Why are we collecting it?

It is the Commission's policy to create a safe working environment, which is free from intimidation and harassment, and where everyone is treated with dignity and respect. Collecting this information helps us inform any future activities we put in place to support this work.

Who is collecting and analysing the data?

Survey responses are collected via the Microsoft Forms which is only accessible by members of the Employee Services team in HR.

An anonymised version of the overall findings will be shared with Leadership Team, Executive Board, the Commission, and the Standards of Conduct Committee and with Senedd Commission officials and elected Members of the Senedd.

Will it be shared or publicised?

No personal information will be shared with external third parties or publicised. If an individual chooses to provide personally identifying information in the free text box sections, this will only be reviewed by the HR staff administering this survey and will not be shared further.

Information will only be shared internally with Executive Board, Heads of Service, Standards Committee and / or the Commission, in an anonymised form. A summary report with overall findings may be published externally on the Senedd website to Commission staff on SharePoint which will also be anonymised.

Where will it be stored?

The information will be stored securely on our ICT systems. Our ICT system includes third party cloud services provided by Microsoft. Any transfer of data by Microsoft outside of the EEA is covered by contractual clauses under which Microsoft ensure that personal data is treated in line with European legislation.

How long is it stored for?

Once the information has been extracted and collated, the raw survey data will be deleted. This will be within 8 weeks of the survey close date. Only anonymised statistical information will be retained after this period.

How is it destroyed?

Once the information has been extracted and collated, the raw survey data will be securely deleted from the ICT system.

Your rights

You have certain rights over the information we hold. In summary the rights are:

- The right to be informed about how your personal information is used;
- The right of access to copies of your personal information;
- The right to rectification if your information is inaccurate;
- The right to erasure of your personal information;
- The right to restrict our use of your personal information;
- The right to object to the use of your personal information.

If you would like to engage any of these rights, please email information-request@senedd.wales.

Our legal bases for collecting, holding and using your personal information

Data protection law sets out various legal bases which allow us to collect, hold and use your personal information. For the purpose of processing the personal data you provide in this survey, we rely on the following legal bases:

Article 6(1)(e) - The processing is necessary for the performance of a task carried out in the public interest

It is in the public interest to ensure that the Commission is able to maintain a safe working environment for any building users, which is free from intimidation and harassment, and

where everyone is treated with dignity and respect. In its role in supporting a Parliament, it is in the public interest that the Commission is able to set an example as to how working environments should function. Similarly, a safe working environment also allows building users to undertake their roles effectively without fear of intimidation or harassment, or a lack of dignity and respect.

Part of ensuring that we are creating and maintaining this environment involves monitoring our internal actions and policies, and the effect these have on building users.

Article 6(1)(c) The processing is necessary for compliance with a legal compliance

The Commission has a duty of care to the health, safety and welfare of building users. The personal data processed as part of this survey will help to ensure that the Commission can continue to meet this duty of care by providing a safe working environment for building users. Monitoring whether internal actions and policies are having a positive or negative effect on this obligation is vital to ensuring it is met.

Any data processing necessary to comply with access to information legislation will also be processed by relying on this legal basis.

Special category personal data

We may process special category personal data as part of this survey if you choose to provide any. Article 9(1) GDPR defines special category personal data as including personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Special category data will be processed on the basis that it is necessary for reasons of **substantial public interest (Article 9(2)(g) GDPR)**, ordinarily read in conjunction with **paragraph 6 of Schedule 1 to the Data Protection Act 2018**. However, some special category personal data relating to diversity and inclusion will be processed in conjunction with **paragraph 8 of Schedule 1 to the 2018 Act**.

As outlined above, where special category personal data is provided, it will be processed to ensure that the Commission is able to maintain a safe working environment free from discrimination, intimidation and harassment and where everyone is treated with dignity and respect. You are not obliged to provide special category personal data as part of your response, and we encourage you to only share personal and special category data if it is necessary for your answer to be interpreted.

Requests for information made to the Commission

In the event of a request for information being made under access to information legislation, it may be necessary to disclose all or part of the information that you provide. We will only do this if we are required to do so by law.

How to complain

You can complain to the Data Protection Officer if you are unhappy with how we have used your data. Contact details can be found above.

If, following a complaint, you remain dissatisfied with our response, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113