



DATA PROTECTION POLICY

Cambridgeshire and Peterborough Region of Learning

1 Background

Cambridge City Council provides services for local communities and the people who live in them. Undertaking this work means that we must collect and use information about the people we provide services to and keep a record of those services. Because we collect and use personal information about individuals, we must make sure that they know what we intend to do with their information and who it may be shared with.

We have summarised in this privacy notice the ways we will use your personal information for European Social Fund (ESF) project purposes. The Cambridgeshire and Peterborough Region of Learning is a new scheme led by Cambridge City Council, which has received funding from ESF. The Managing Authority for this ESF fund is the Department for Work and Pensions (DWP). The Cambridgeshire and Peterborough Region of Learning (CPRoL) scheme is delivered by a partnership of organisations, led by Cambridge City Council, working collaboratively under a legal Service Agreement.

The Cambridgeshire and Peterborough Region of Learning (CPRoL) scheme treats the information we hold about our participants very seriously and we will comply with the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679. This Privacy Notice explains how Cambridge City Council will use your personal information to deliver the Cambridgeshire and Peterborough Region of Learning (CPRoL) project, and who we share your personal information with.

Within this Privacy Notice, we use the following terms:

- *Data Controller* – means the organisation which decides the purposes for which, and the way in which any personal data are to be processed.
- *Data Processor* - means the organisation which processes the data on behalf of the data controller.
- *Processing* - includes most operations involving data including obtaining, recording, sharing, deleting, adapting, or altering the information.

2 About the Cambridgeshire and Peterborough Region of Learning (CPRoL) Project

The project is funded by the European Social Fund (ESF) under the operational programme priority axis 'Inclusive Labour Markets' to support the sustainable integration of young people aged 15 to 24 years, particularly those not in employment, training or education; into the labour market. The project is also supported with funding from Cambridgeshire County Council, Cambridge City Council, Form the Future CIC, Anglia Ruskin University, and Arts Council England. The project will receive ESF funding until 31st December 2023.

CPRoL is managed by Cambridge City Council (lead partner and ESF grant holder) with ESF delivery and project partners Form the Future CIC, Shift Momentum, Navigator, and the

Royal Society of Arts, Commerce and Manufacturers (grant recipients) and Anglia Ruskin University (ARU); on behalf of The Department for Work and Pensions (DWP) who are the Managing Authority for ESF.

3 Why we are collecting information

The project will provide mentoring support and coaching, career advice, training and basic skills qualifications to people seeking work, training or further education, who are unemployed or not in education or training aged from age 15 to 24 years. In order for us to deliver the project (in line with the terms of the ESF grant funding) and to provide you with the best possible support; we need to collect and use personal information about the people who attend our programme.

4 Stages where we will ask you to provide personal information about yourself

To assess your eligibility for the scheme, Form the Future will ask you to verbally, or in writing (for example by email), provide consent that allows them to collect information about you. This includes questions relating to your age, employment status, right to work in the UK, and proof of your identity. If you are not eligible or choose not to join the scheme; you have the right to request that any personal information collected about you is deleted at this stage. No information will be shared with any other party. We may keep a record of how many people have been assessed, but this will not include any personally identifiable information.

If you are eligible, are accepted and want to join the scheme then the personal information you give us will be subject to conditions outlined in the points below (5 to 13).

5 Who are the Data Controller and Data Processors for the Project

The Data Controller for the Cambridgeshire and Peterborough Region of Learning project is the DWP. The DWP is the controller for all personal data required to deliver the European Social Fund (ESF) programme under the terms of its ESF Funding Agreement.

Cambridge City Council and its delivery partners are Data Processors of personal information relating to the project. Form the Future is a delivery partner who is processing data on behalf of Cambridge City Council.

Delivery partners may request additional information not included in this Privacy Notice. Where this is the case, they will make a separate agreement with you. The DWP is not the controller for any other / additional personal data collected by delivery partners.

6 What information will be collected

We collect and process personal information which may identify you as an individual. Examples of the types of personal data that we may collect, use, store, and share (when appropriate) include:

- Contact details, including name, address and postcode, telephone numbers and email address.
- Identifying details, including date of birth, gender, ethnicity, and national insurance number.
- Information that confirms your right to live and work in the UK such as a passport; birth certificate and National Insurance Number and DWP benefit details.
- Employment/economic status
- Information about your family, dependents, or personal circumstances, for example, marital status; caring responsibilities, employment status of household members.

- Information about your health, for example, a disability or medical condition which creates a barrier in relation to gaining employment.
- Education and qualifications
- Homelessness
- Offender / ex-offender status
- We also collect and hold information that is generated during the attendance of project activities including training, support provided; details of conversations, and any other events that happen that you tell us about
- Referral organisation, reason for referral and any other supporting information

We may collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR. For example, this might include some of the reasons that are included on the Recruitment Form or on the Participant Action Plan to assess eligibility for the project. Special category data is personal data includes ethnicity, gender and information relating to health/learning difficulties or disabilities.

The GDPR provides the DWP (and project delivery partners as data processors on behalf of Cambridge City Council) with the following special category condition for processing 'special category' (sensitive) data:

Article 9(2) (b) "processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject".

7 Where does the Project get my information from?

We obtain this personal information directly from the person who is taking part in the project. It is collected via the ESF project registration form, and the suitability assessment.

We may also receive information (for example, contact details) from the organisation that is making a referral to the ESF project on behalf of an individual (with their consent). A referral will include the least amount of information on an individual – their name and preferred method of contact, and the reason for the referral. If a referral request does not result in the individual becoming a Project participant within six months for whatever reason, all data captured in the referral process will be securely destroyed. While this may appear long, some participants with complex circumstances can take up to several months before they decide to fully engage in a programme. We do not want to exclude potential participants who fall into these categories unnecessarily.

We also generate our own information about you while you are on project. For example, details of conversations, training, events you tell us about that are important to you and the support we provide as well as any qualifications you achieve.

8 What we will do with the information and how it will be used

Cambridge City Council processes personal information for the purposes of delivering the aims of the Cambridgeshire and Peterborough Region of Learning project, including provision of different forms of support to young people aged 15-24 across Cambridgeshire and Peterborough, who may be struggling to move forwards in life. We use personal information to provide advice and help to support young people take steps back into

education, employment, to find training opportunities, mentoring, or to develop key skills, basic skills, access the right career guidance, and to arrange work experience etc.

Information will be used to provide reports to the DWP to demonstrate that the Project is being run correctly and within the terms of funding. Your information will be used for statistical analysis to ensure the success of current and future projects. The information will be used with details of others on the programme and you will not be personally identifiable. Anonymised data will also be used as part of the Project evaluation which will not reference or identify individual participants, and will report to the European Social Fund for monitoring purposes, in line with European Commission regulatory requirements.

9 Who we will share information with

Participation in the CPRoL project is voluntary, however, if you choose to participate, regulations relating to Cambridge City Council's project funding require us to share certain information about participants with the DWP, and grant recipients who are our project delivery partners and the ESF for monitoring purposes.

Your information will be shared with delivery partners where appropriate, and research organisations working on behalf of the DWP who may contact you to discuss your involvement in the project for research purposes. Participation in research is voluntary. If you do not wish your personal data to be used for ESF evaluation purposes please contact ESF.EVALUATIONS@DWP.GSI.GOV.UK and they will delete your data held for these purposes and you won't be contacted about participating in research.

There is a data sharing agreement in place between Cambridge City Council and its delivery partners, to ensure all data is securely transferred, handled, stored, and destroyed. With your agreement we may work with and therefore share data with other organisations to support you, this will be dependent upon your individual requirements.

The DWP may also link your personal details to official administrative records to monitor your employment status before your ESF support began and 6 to 12 months after you left. This information may also be shared with research organisations working on behalf of the DWP however individuals will not be identifiable, and you will not be contacted about this research.

Your personal information will not be used or shared for any commercial or marketing purposes. At all times, your information will be kept securely, and nobody will have access to it who should not.

10 How long we will keep your information

All personal data held by DWP or research contractors for the purposes of evaluation (eg evaluation of the success of the project/programme) will be permanently deleted no more than six months after the research has been completed (eg when the final report is published on GOV.UK).

Cambridge City Council will hold your personal information in a secure environment. Personal data held by DWP for all other ESF purposes as required by European Commission regulations will be retained in line with the current guidance on GOV.UK at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591617/ESF_Guidance_on_document_retention.pdf. As per the funding requirements for this programme, Cambridge City Council and our delivery partners are legally obliged to retain your information for ten years after the ESF programme is complete, which is 31st December 2033.

11 Consent and other lawful bases

For the purposes of the General Data Protection Regulation (GDPR) and related data protection legislation, the DWP is the data controller in respect to information processed which relates to all participation in this ESF project. Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). The lawful basis for processing your personal information is included below.

Consent is the lawful basis for processing personal data up until the point that a young person is accepted onto, and starts, the programme offered by the Cambridgeshire and Peterborough Region of Learning project. The lawful basis for processing personal data once the young person registers for the Cambridgeshire and Peterborough Region of Learning under the ESF is:

Article 6 (1) (e) GDPR: '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'. The [ESF Programme Action Note 018/18](#) sets out further information about the DWP's lawful basis for processing personal data under ESF.

12 Your Data Protection Rights

Under data protection law, you have rights including:

- Your right of access - you have the right to ask us for copies of your personal information.
- Your right to rectification - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to restriction of processing - you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - you have the right to object to the processing of your personal information in certain circumstances, if you object to the continued processing of your data, we will weigh up your objections against our grounds for continuing with the processing.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us at infogov@3Csharedservices.org or 01223 457000 if you wish to make a request.

Information about how to ask for a copy of the information DWP holds about you (known as a 'Right of Access Request') can be found at: <https://www.gov.uk/guidance/request-your-personal-information-from-the-department-for-work-and-pensions>. If you wish to make a Right of Access Request (RAR) about the information held about you on the programme directly to the DWP ESF Managing Authority, please make your request directly through the online form, on GOV.UK, using the following link: 2014-2020 ESF Programme – Action Note v1 Date Published to GOV.UK: 24/05/2018

<https://www.gov.uk/government/publications/dwp-request-for-personal-information>

Individuals who are unable or unwilling to make their request online, should write to the following address: Right of Access Gateway Team, Post Handling Site A, Wolverhampton, WV98 2EF.

13 Contact Details

If you have any questions, queries or complaints, and to exercise your personal data rights including your right to access your personal information, please in the first instance discuss this with your Key Worker or you can contact the Cambridge City Council data protection lead at infogov@3Csharedservices.org or 01223 457000. If you are unable or unwilling to make your request online, please write to the following address: Information Governance, Cambridge City Council, PO Box 700, Cambridge CB1 0JH.

If you have any questions relating to how the DWP are processing your personal data or if you wish to exercise your data protection rights relating to information processed by the DWP then please contact the Data Protection Officer at the Department of Work and Pensions rightofaccess.requests@dwp.gsi.gov.uk.

You can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

This Privacy Notice will be made publicly available through the Cambridge City Council website and participants will be made aware of its existence when joining and registering for the scheme.

Signed:

Jane Wilson 

Position: Director of Neighbourhoods and Communities

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Next Review date: 31.03.2024 or with any significant legislative or programme changes.