

## **IGFM005-PRIVACY NOTICE**

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR) effective from the 25th May 2018.

|                             |                                   |
|-----------------------------|-----------------------------------|
| <b>TCBC Service Area:</b>   | NSPPP                             |
| <b>Work area:</b>           | Skills and Employability          |
| <b>Contact Details:</b>     | Gareth Jones                      |
| <b>Privacy Notice Name:</b> | Inspire 2 Work Joint (JB1 - full) |

This notice is intended for participants of Inspire 2 Work.

### **Data controller:**

**Torfaen County Borough Council**  
**C/o Civic Centre**  
**Pontypool**  
**NP4 6YB**

### **Data Protection & Information Governance Officer:**

**Susan Bullock**  
**01633 647467**  
**Email: [dpa@torfaen.gov.uk](mailto:dpa@torfaen.gov.uk)**

#### **1) Have we sourced your personal data, directly from you?**

The majority of the data covered under this privacy notice is collected directly from you

We may also receive data from third parties such as:

- awarding bodies for qualifications,
- placement or volunteering providers,
- other organisations and projects such as Job Centre Plus, Careers Wales and Communities for Work where we may require evidence of your eligibility to join the project.

#### **2) What information does the Council collect about you?**

The Council collects and processes a range of information about you.

This includes:

Personal Identifiers such as Name, Date of Birth, National Insurance number and a project issued identification number;

Your contact details;

Household status data such as if you live in a single adult household or a jobless household, have caring responsibilities or are at risk of becoming homeless.

Employment status details such as if you are currently out of work and for how long, if you are participating in other government funded schemes or ESF programmes.

Equality of Opportunity data such as gender, ethnicity, memberships of a minority ethnic group, migrant worker status and disabilities or work limiting health conditions.

Assessment data such as your starting qualifications, your goals and barriers to employment and/or career progression.

Welsh language data such as your skills using the language and your preferred language for communication and study.

Data relating to the activities you undertake with the project such as course or group work details, dates, support received and agreed action plans.

Placement Details: Placement provider, placement dates and reviews;

Data relating to the outcomes of the activities you undertake with us such as qualifications attained, gaining employment or other changes in your employment status.

### **3) The Council may collect this information in a variety of ways:**

Your data is collected by our staff through the application forms and other paperwork you complete on the project.

Data about the qualifications you attain may be collected from the awarding bodies of those qualifications and details of your work placement or volunteering will be obtained from the organisation that hosts you.

#### **We will store your data:**

We hold the original paper copies of the data in secure restricted access filing areas and in electronic form in a secure project database accessible only to a small number of authorised staff.

### **4) Why does the Council process your personal data?**

We need to process this personal data to carry out a task in the public interest (the provision of youth employability services) in our capacity as a public body.

We also hold data to enable us to meet our legal obligations in reporting to the Lead Beneficiary (Blaenau Gwent CBC) and the Welsh Government.

We and our data processors will use this data for any or all of the following purposes:

- To contact you about matters relating to your project activity (don't worry this does not include marketing other services)

- To assess your eligibility and suitability for and progression in the services offered by the project
- To keep track of your journey and all of the activities and support you may have taken up
- To make decisions about the effectiveness of the services we offer to continually improve our delivery
- To provide reports and support funding claims to our funding body
- To provide an audit trail of evidence of project activities
- To provide data for an evaluation of the project

**5) Special categories of personal data:**

We collect some data about your health in order to provide the most appropriate and effective support that meets your needs and circumstances. We collect data about your ethnicity, BME categories and Migrant status because this is required for reporting purposes to the Welsh Government.

**We can process this category of data because:**

You have given explicit consent for us to do so.

**6) Who has access to your data?**

We will share the minimum necessary data with the following organisations. Each of these controllers are also directly responsible to you for the data that they hold and will have their own privacy policies that will apply to their use of your data. We will endeavour to provide you with links to these policies where possible.

- Blaenau Gwent CBC – the lead body for the project. They collate of the data from each of the delivery teams (like Torfaen) and report to the Welsh Government.
- Welsh Government department Welsh European Funding Office (WEFO) for the purpose of reporting the work of the project and in order to receive funding for the project. The data may also be passed to duly authorised auditors for the purpose of auditing our work in managing the project.
- Awarding and/or certifying bodies (such as Agored Cymru, BCS etc) for your course in order for you to receive a qualification.
- A professional social and economic research organisation for the purposes of evaluating the operation.
- Our contracted delivery providers in order for them to organise and run courses for us.
- In some cases, where you agree that a referral to another provider would benefit you, we will request your consent to forward your details to another provider. This consent will be collected at the time of the referral and will only be used to share contact details with the provider named on the consent form.

## **Is the Data transferred out of the EEA?**

No

### **7) How does the Council protect data?**

The Council has internal policies in place to ensure the data it processes is not lost, accidentally destroyed, misused or disclosed. Furthermore data is not accessed by employees except in the performance of their duties.

Where the Council engages third parties to process personal data on its behalf, they do so on the basis of written instructions. These third parties are also under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data.

### **8) How long does the Council keep your data?**

The Council will hold your personal data only for the period that is necessary and will follow organisational and Local Authority standards in this area. We will keep your information in line with our Local Authority retention schedules. The ESF funded projects have separate retention policies that comply with statutory obligations. The documents will be kept for 2 calendar years from the 31 December that follows the inclusion of the final eligible expenditure that signifies the completion of the operation. For example if the project closes in December 2022 and the final claim is submitted in January 2023 then the documents will need to be retained until 31<sup>st</sup> December 2025.

### **9) Are we making automated decisions/profiling with your data?**

No

## **Your rights**

You have a number of rights you can exercise:

- access and obtain a copy of your data on request
- require the Council to change incorrect or incomplete data
- under certain circumstances you can require the Council to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- to know the period of time that the data will be stored for
- the right to data portability
- the right to withdraw your consent at any time
- the right to lodge a complaint with a supervisory authority (Information Commissioners Office)
- to be informed of the potential consequences of if you fail to provide data to the Council

- to be informed of the existence of any automated decision-making, including profiling and the consequences of this for you.

If you would like to exercise any of these rights, please contact Neighbourhood Services Planning and Public Protection, Gareth Jones, [gareth.jones4@torfaen.gov.uk](mailto:gareth.jones4@torfaen.gov.uk)

## DOCUMENT CONTROL

|                                 |   |                          |                          |
|---------------------------------|---|--------------------------|--------------------------|
| <b>Title:</b>                   | <b>TEMPLATE – Privacy Notice</b>            |                          |                          |
| <b>Document Owner:</b>          | <b>Senior Information Risk Owner (SIRO)</b> |                          |                          |
| <b>Document Author:</b>         | <b>Jonathan Hale</b>                        |                          |                          |
| <b>Reference:</b>               | <b>IGFM005</b>                              | <b>Retention Period:</b> | <b>Until next review</b> |
| <b>Document Classification:</b> | Official                                    | <b>Location:</b>         | SWOOP                    |
| <b>Version / Status:</b>        | Draft V0_1                                  | <b>Approved by:</b>      | SIRO                     |
| <b>Current Issue Date:</b>      | April 2018                                  | <b>Next Review Date:</b> | April 2019               |

## REVISION HISTORY

| <b>Issue Date</b> | <b>Version / Status</b> | <b>Reason for Change</b>                | <b>Changed By:</b> |
|-------------------|-------------------------|---|--------------------|
| April 2018        | 1.0 Live                | Form created to achieve GDPR Compliance | Sue Bullock        |
|                   |                         |   |                    |
|                   |                         |   |                    |
|                   |                         |   |                    |