



Privacy Notice No: 18/1634  
Date Created: 05/12/18  
Date Published: Provided by CIGU  
Version Number: 1

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<b>Service Area:</b>	Community Education
<b>Work Area:</b>	ESF Employability Projects Inspire 2 Work Bridges into Work 2 Working Skills for Adults 2 Nurture Equip & Thrive
<b>Contact Details:</b>	01495 237921
<b>Privacy Notice Name:</b>	ESF Employability Projects
<b>Description of Privacy Notice:</b>	This privacy notice describes how the Council's ESF Employability Projects Team uses the personal information you provide on your enrolment forms, at initial interviews and during our ongoing contact with you. It also includes links to the Privacy Notices of Wales European Funding Office (WEFO) and the local authority that acts as Project Lead Sponsor.

## How we will use your information

### Source and type of information being processed

#### Categories of personal data obtained

Caerphilly County Borough Council has obtained the following categories of your personal data from your enrolment form to enrol onto one of the ESF employability projects:

- Surname
- Forename(s)
- Address
- Postcode
- Telephone number
- National Insurance Number
- Gender
- Email address
- Date of birth
- National Identity
- Migrant status
- Caring responsibilities
- Household status
- Employment status

- Benefit status

The enrolment form also requests information about you which is defined as **special category data**. Providing this data is optional and will include

- Ethnicity
- Health conditions including disability type

The employability team will also maintain a case record of your involvement with the team, which will include:

- Your enrolment form, as documented above
- Courses and type of employment that you express an interest in undertaking
- Courses and details of employment that you subsequently engage in
- Other agencies that we refer you to as a result of problems that you disclose to us

During the enrolment interview, you will be asked if you have any criminal convictions for health and safety purposes and to identify any additional support that you might require. If you disclose a criminal conviction, this information will be recorded in a risk assessment on your case record.

### Source of the personal data

Enrolment form, initial interview and ongoing contact with you.

## Purpose and legal basis for using your information

In order for the processing of personal data to be lawful under the General Data Protection Regulations 2016, a valid condition from Article 6 of the Regulations must be identified. Data Protection legislation provides extra protection for certain classes of information called 'special category personal data'. If any information falls within the definition of special category personal data then an additional condition from Article 9 of the Regulations must be identified. There is also extra protection for personal data in relation to criminal convictions and offences. If any personal data falls within this category then an additional condition from Article 10 of the Regulations must be identified.

The lawful basis for processing personal information is outlined in the table below, together with the purpose.

Purpose	Lawful basis for processing		
	Personal data (Art 6)	Special category data (Art 9)	Criminal convictions/offences (Art 10)
<p>Caerphilly County Borough Council's ESF Employability Projects process personal information to assist applicants to access education and employment opportunities.</p> <p>Special Category Data (i.e. ethnicity, health conditions) is optional, and if supplied it is processed to ensure and monitor equality of opportunity and treatment.</p>	6(1)(f) Legitimate Interests	9(2)(g) Substantial Public Interest Condition and DPA 2018 Sched 1(8) equality of opportunity or treatment	9(2)(b) and DPA 2018 Sched 1(1) employment, social security and social protection

Criminal convictions/offences data is requested at interview stage, in order for a risk assessment to be completed if necessary.			
To fulfil funding conditions, we must share information with lead sponsors, the lead sponsors are Torfaen county Borough Council and Blaenau Gwent County Borough Council. All partners work jointly on these projects to maximise funding and reduce costs.	6(1)(f) Legitimate Interests		
To fulfil funding conditions, certain information about learners must be provided to Welsh Government, but this will not include special category or criminal convictions data unless the data has been anonymised.	6(1)(f) Legitimate Interests		

## Who will have access to your information

### Identity of Data Controller and Data Protection Officer

The Data Controller for your information is Caerphilly County Borough Council. The Data Protection Officer is:

Ms Joanne Jones  
Corporate Information Governance Manager / Data Protection Officer  
Email: [dataprotection@caerphilly.gov.uk](mailto:dataprotection@caerphilly.gov.uk)  
Tel: 01443 864322

Other Data Controllers may also be responsible for your information, depending on the specific circumstances. Please contact the Service Area for further information.

### Details of main users of your information

Caerphilly County Borough Council ESF Employability Projects Team.

### Details of any sharing of your information within Caerphilly county borough council

The Communities First Team will assess applications in case it would be helpful to refer applicants to other funded projects administered by the Council or other organisations. You will be contacted to check that this assessment by Communities First Team is ok with you.

### Details of any sharing of your information with other organisations

As the Lead sponsors for these ESF project were are required to share information with:

Torfaen County Borough Council for Bridges into Work 2, Working Skills for Adults 2 and Nurture Equip & Thrive.

Blaenau Gwent County Borough Council for Inspire 2 Work.

Welsh Government for all European Funded projects, as its Wales European Funding Office (WEFO) manages the provision of funding, conducts audits and produces reports to meet funding guidelines.

### **Requests for information**

All recorded information held by Caerphilly County Borough Council may be subject to requests under the Freedom of Information Act 2000, Environmental Information Regulations 2004 and Data Protection legislation.

If the information you provide is subject to such a request, where possible Caerphilly County Borough Council will consult with you on its release. If you object to the release of your information we will withhold your information if the relevant legislation allows.

## **How long will we retain your information**

### **Details of retention period**

How long Caerphilly County Borough Council retains information is determined through statutory requirements or best practice. For European funded projects, we must retain information until 2027 or until disposal is authorised by WEFO.

## **Your Rights (Inc Complaints Procedure)**

### **Your rights under the Data Protection**

Data Protection gives data subjects (those who the information is about) a number of rights:

- The right of subject access – Application forms for this process are available on our website: [SAR Form](#)
- The right to be informed
- The right of rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability
- Rights in relation to automated decision making and profiling.

Further information on your rights is available from: [www.ico.org.uk](http://www.ico.org.uk).

To enact your rights please contact the service area detailed on the top of this form.

### **Complaints Procedure**

If you are unhappy with the way that Caerphilly County Borough Council has handled your request / information, you have the right of complaint. Please contact the Service Area detailed at the top of this document outlining your issues.

If you remain unhappy you also have a right of complaint to the Information Commissioner's Office. Please follow this link for further information on the complaints process.

[www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints](http://www.caerphilly.gov.uk/My-Council/Data-protection-and-freedom-of-information/Questions-and-complaints)

## Other privacy notices

**Privacy notices for our partner organisations can be found at the following links:**

<https://www.torfaen.gov.uk/en/AboutTheCouncil/DataProtectionFreedomofInformation/DataProtection/Data-Protection.aspx>

<https://www.blaenau-gwent.gov.uk/council/data-protection-foi/councils-privacy-notice/>

<https://gov.wales/docs/caecd/publications/180518-privacy-notice-en.pdf>

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# Summary Privacy Notice

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## How we will use your information

This privacy notice describes how the Council's ESF Employability Projects Team uses the personal information you provide on your enrolment forms, at initial interviews and during our ongoing contact with you.

Caerphilly County Borough Council's ESF Employability Projects process personal information to assist applicants to access education and employment opportunities. Information is shared with Torfaen County borough council and Blaenau Gwent county Borough Council in line with the funding guidelines. To fulfil funding conditions, certain information about learners must be provided to Welsh Government, but this will not include special category or criminal convictions data unless the data has been anonymised.

The Communities First Team will assess applications in case it would be helpful to refer applicants to other funded projects administered by the Council or other organisations. You will be contacted to check that this assessment by Communities First Team is ok with you.

You have a number of rights in relation to the information including the right of access to information we hold about you and the right of complaint if you are unhappy with the way your information is being processed.

For further information on how we process your information and your rights, as well as links to information from Wales European Funding Office (WEFO) and the local authority that acts as Project Lead Sponsor please click the following link:

[{Hyperlink to Full Privacy Notice on our website}](#)