



## Privacy Notice for Routes to Work Potential, Current and Past Participants

### How we use your personal information

The Routes to Work project is an ESF funded partnership led by East Coast College with Access Community Trust, ACE Training, DIAL and Voluntary Norfolk.

The Department for Work and Pensions (DWP) is the data controller in respect to information processed which relates to participation in the European Social Fund (ESF).

Action Community Enterprises CIC (ACE) is a data processor in respect to information processed which relates to participants in the BBO project funded by the European Social Fund.

ACE is the data controller and processor of any other personal information it holds about you.

ACE's Data Protection Officer is Lou Gardiner. If you have any questions about this notice or the ways in which ACE uses your personal information, please contact our Data Protection Officer at 2 Dewing Road, Rackheath, Norwich, NR13 6PS or

[info@ace-project.org.uk](mailto:info@ace-project.org.uk)

DWP's Data Protection Officer is Dominic Hartley. If you have any questions about the ways in which the DWP uses your personal information, please contact their Data Protection Officer at Data Protection Team, Benton Park View 5, Mail Handling Site A, Wolverhampton, WV98 1ZX or [data.protectionofficer@dwp.gsi.gov.uk](mailto:data.protectionofficer@dwp.gsi.gov.uk)

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

This notice sets out how we use your personal information and in particular:

- the information that you give us;
- the uses made of your personal information;
- the purposes of the data processing;
- the legal basis on which we collect and use your personal information;
- how long we keep your personal information;
- how we share your personal information;
- how we transfer your personal information outside of Europe; and
- your rights over your personal information; and
- changes to our privacy policy



## The information that you give us

We will collect personal information from you when you register as a participant of the Routes to Work project.

This will include your:

- name
- gender
- marital status
- previous surname(s)
- address
- date of birth
- phone number
- email addresses
- NI number
- start date
- next of kin and contact details
- certifications/qualifications,
- gender
- work assessment data
- examination/test results and certificates
- pay slips
- right to live and work in the UK
- employment status
- household situation
- past history as an offender or ex offender
- wellbeing self-assessment
- additional needs details



## The uses made of your personal information

We will use your personal information to manage and administer your involvement in the Routes to Work Project as follows:

- for the recruitment process and for carrying out pre-enrolment eligibility checks
- compiling activity lists
- sending appointment invitations
- communicating with you
- dealing with your involvement in the project
- compiling reports and registers
- making arrangements for exams or visits such as workplace placements
- considering whether special provision or assistance is required whilst you are a participant
- contacting you about your attendance and progress
- monitoring your progress whilst engaged with the project
- providing evidence to the project funder on the outcomes of engagement with the project
- informing your future training providers, work placement provider and employer about your attendance dates and programmes of study
- for safeguarding participants.
- for checking your identity and right to work in UK
- to reimburse expenses
- for communicating with you

We treat your personal information with confidentiality and we do not use it for any other purposes.

## The purposes of the data processing

The DWP may also link your personal details to official administrative records in order 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 Version 5 published 4 June 2018 individuals will not be identifiable and you will not be contacted about this research.



## The lawful basis for the processing

Generally, the information is processed as part of the DWP's and ACE's public interest task of providing education to you.

Where that information is special category personal information (e.g. medical information) we will process it because there is a substantial public interest for us to do so.

## How long we keep your personal information and the retention periods for the personal data

All personal data held by DWP or research contractors for the purposes of evaluation will be permanently deleted no more than six months after the research has been completed, i.e. when the final report is published on the gov.uk website.

The European Social Fund predicts their retention period will last until 31 March 2034.

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 at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591617/ESF\\_Guidance\\_on\\_document\\_retention.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591617/ESF_Guidance_on_document_retention.pdf)

ACE will not keep your personal information for longer than we need it for the purposes we have explained above. Details of how long we keep each type of information can be found in the College's retention schedule.

## How we share your personal information

ACE may share the personal information that you give us with the following organisations (or types of organisation) for the following purposes.

Organisation/type of organisation:

- a) Partner organisations i.e. East Coast College with Access Community Trust, DIAL and Voluntary Norfolk
- b) East Coast College
- c) DWP

Purpose:



- a) Provision of services, including publicising future events, to participants on the Routes to Work project
- b) Monitoring of and reporting on the project to DWP to enable reporting to the European Social Fund for monitoring purposes, in line with European Commission regulatory requirements
- c) Evaluation of the project and to reporting to the European Social Fund for monitoring purposes, in line with European Commission regulatory requirements
- d) Provision of a management information system used to record and track participants' progress on the project

Organisation/type of organisation:

- a) Examining bodies
- b) Local authorities and partner agencies including the police
- c) Auditors
- d) Businesses
- e) Research organisations working on behalf of the DWP

Service:

- a) Processing of exam entries and recording of achievements
- b) Protecting the safety and wellbeing of people including children and vulnerable adults where there is a potential risk of harm
- c) Auditing of the Routes to Work project's activities
- d) Provision of work experience and volunteer placements and purchasing expenses for involvement in the activities.
- e) discuss participants' involvement in the project for research purposes (*Note: participation in research is voluntary and consent will be gained before contact is made regarding taking part in research activity and if a participant does not want their personal data used for research purposes an email should be sent to [esf.evaluations@dwp.gsi.gov.uk](mailto:esf.evaluations@dwp.gsi.gov.uk)*)



*Note: The DWP may also link a participant's personal details to official administrative records in order to monitor their employment status before their ESF support began and 6 to 12 months after they left. This information may also be shared with research organisations working on behalf of the DWP however Version 5 published 4 June 2018 individuals will not be identifiable and individuals will not be contacted about this research.*

## Your rights over your personal information

You have a number of rights over your personal information, which are:

- the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this <https://ico.org.uk/>
- the right to ask us what personal information about you we are holding and to have access to a copy of your personal information
- the right to ask us to correct any errors in your personal information
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information
- the right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information
- the right, in certain circumstances, to ask us to review and explain our legitimate interests to you
- the right, where our use of your personal information is carried out for the purposes of an agreement with us and is carried out by automated means, to ask us to provide you with a copy of your personal information in a structured, commonly-used, machine-readable format.

## Changes to our privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be notified to participants by email and will be displayed on the ACE and Routes to Work websites.

This document can be provided in a larger font, electronically or to meet another accessibility requirement on request.

### Version 1 - Nov 2020

