



European Union

European
Social Fund



**WORKING
FUTURES**

GREENBANK: WORKING FUTURES PROJECT PRIVACY NOTICE

WHO WE ARE

The Greenbank-Project (The) is an educational provider which includes Greenbank College and Greenbank Sports Academy. Greenbank leads a partnership of educational and employment support providers that deliver the Working Futures project to 16-29 year olds in the Liverpool City Region.

At Greenbank, we are committed to maintaining the trust and confidence of all staff, students and visitors. In particular, we want you to know that Greenbank is not in the business of selling, renting or trading your information with other companies and businesses for marketing purposes.

In case you don't believe us, please see our full Privacy Notice that covers all of our business and services (available on www.greenbank.org.uk). In our Privacy Notice, we've provided lots of detailed information on when and why we collect your personal information, how we use it, the limited conditions under which we may disclose it to others and how we keep it secure.

Equally, all of our partners on the Working Futures project are also not in the business of selling, renting or trading your information with other companies and businesses for marketing purposes. They are expected and, indeed, contractually bound to treat your personal information with the same level of care and safety as we do.

The Working Futures project is funded by the European Social Fund (ESF) and Youth Employment Initiative.

The Department for Work and Pensions (DWP) is the Managing Authority for ESF in England.

HOW WE COLLECT YOUR INFORMATION

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in enrolling on the Working Futures project;
- when you apply to enrol on the Working Futures project, complete enrolment forms and when you complete other admissions processes and procedures;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- in various other ways as you interact with us during your time as a participant on the Working Futures project.



European Union

European
Social Fund



**WORKING
FUTURES**

THE TYPES OF INFORMATION WE COLLECT IN RELATION TO YOUR PARTICIPATION IN THE WORKING FUTURES PROJECT; HOW AND WHY WE USE IT

Greenbank and its delivery partners collect, store, use and report different types of personal information from or about you. This falls in to two categories:

1. The majority of this information is a contractual requirement of our funders, the Department for Work and Pensions (DWP), the Managing Authority for ESF in England. The DWP uses this information to evaluate the project and to report to the European Social Fund, in line with European Commission regulatory requirements.
2. Other personal information, above and beyond that contractually required by the DWP, is collected to aid the partnership's delivery of the project. This helps us to provide, improve, and develop our service delivery, to protect you, our other users and us.

1. Personal data that needs to be collected mandatorily for ESF monitoring/ reporting purposes.

As part of our funding agreement with the DWP we are contractually required to collect, store and report a range of personal information in relation to students' participation with the project. This includes:

- Your name, and contact information such as address, email address and telephone numbers, as well as your date of birth, national insurance number and nationality. It also includes keeping copies of evidence of your eligibility for the project such as your passport, birth certificate and benefits information. We will also allocate you a unique student number.
- Information relating to your previous educational attainment, current employment status and employment history.
- Information about your family and personal circumstances required for ESF monitoring, such as the work status of others in your household.
- sensitive personal data and information, including:
 - e.g. whether you consider yourself to have a disability, learning difficulty or long-term health condition;
 - whether you have a history of offending; and
 - information about your racial or ethnic origin; religion or similar beliefs.
- Outcomes achieved as a result of your participation in the project such as qualifications achieved, or whether you have progressed to further education, training or work.



European Union

European
Social Fund



**WORKING
FUTURES**

The DWP has confirmed that:

1. It is the data controller for this personal information and Greenbank and its project delivery partners are data processors.
2. The lawful basis for processing personal data in relation to ESF funded projects is 'Public task'; that is the processing is necessary for performing a task that is in the public interest or official function and has a clear basis in law.
3. You (*an ESF participant*) cannot claim the following rights in terms of ESF personal data:
 - a. The right to erasure ("right to be forgotten")
 - b. The right to portability of your data
4. In addition to reporting to European Commission, your information will also be shared with research organisations working on behalf of the DWP, who may contact you to discuss your involvement in the project for research purposes. Participation in the DWP's own research is voluntary and you will be asked to consent before taking part in any research activity you may be contacted about.
5. They 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 individuals will not be identifiable and you will not be contacted about this research.
6. Data will not be used or shared for any commercial or marketing purposes.
7. 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 GOV.UK).
8. If you do not wish your personal data to be used for ESF evaluation purposes please contact ESF.EVALUATIONS@DWP.GSI.GOV.UK and we will delete your data held for these purposes and you won't be contacted about participating in research.
9. 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



European Union

European
Social Fund



**WORKING
FUTURES**

2. Other data/ information collected as part of the Working Futures project

To aid our delivery of the project, Greenbank and its delivery partners also collect, store and use some additional data and information above and beyond that contractually required by the DWP. This helps us to provide, improve, and develop our service delivery, to protect you, our other users and us.

This includes using personal information for purposes such as tailoring our services to your needs, data analysis, research, audits and monitoring and evaluation to improve our performance. Such processing is based on our legitimate interest in delivering our services to you, and contractual and regulatory compliance.

Additional data and information collected includes:

- Information concerning your health and medical conditions (e.g. disability, learning difficulty, dietary or other health related needs);
- Any out-of-work benefits you are in receipt of;
- Background information to assess your suitability for the project and help us to support you better, such as your prior learning and work experience; personal interests; qualifications achieved; other achievements; job/ career aspirations; personal circumstances; personal and social skills; and any specific support needs you may have;
- Your feedback and views of the course;
- Details of the work or further education/ training you progress to following your participation in the course, including the name of the employer/ college/ training provider, the job title/ role or the course/ qualification you have progressed to.

We will also keep records relating to assessments of your work, details of examinations taken, including actual examination grades and other information in your student record.

In respect of this additional data and information, Greenbank is the data controller and its project delivery partners are the data processors.

The lawful basis for processing this additional data and information is 'Consent'; which means that you have to give us clear consent for your (non-ESF) personal data to be processed.

For any of the uses of your data described in section 2 above that require your prior express consent, note that you may withdraw your consent by contacting **Greenbank's Data Protection Officer** on **0151 733 7255**.

Under the General Data Protection Regulations (GDPR), data subjects (*you as a participant on the Working Futures project*) have the right to access and amend any of their personal data Greenbank holds. You also have the following rights:

- The **right to be informed** about our processing of your personal data;



European Union

European
Social Fund



**WORKING
FUTURES**

- The right to have your personal data **corrected if it is inaccurate** and to have **incomplete personal data completed**;
- The right to **object** to processing of your personal data;
- The right to **restrict processing** of your personal data;
- The right to **have your personal data erased** (the 'right to be forgotten')
**this right does not apply to personal data that needs to be collected mandatorily for ESF monitoring/ reporting purposes;*
- The right to **request access** to your personal data and information about how we process it;
- The right to **move, copy or transfer your personal data ('data portability')**
**this right does not apply to personal data that needs to be collected mandatorily for ESF monitoring/ reporting purposes;*
and
- Rights in relation to **automated decision making** including profiling
- You have the right to complain to the information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law:
<https://ico.org.uk/>.

DISCLOSURE OF PERSONAL INFORMATION

We make certain personal information available to strategic partners that work with us to provide our services or help us market to customers. Personal information will only be shared by us with these companies in order to provide for audit/evidential or to improve our products, services, and advertising; it will not be shared with third parties for their own marketing purposes without your prior express consent.

Service providers

Greenbank shares personal information with companies and organisations that provide services on its behalf, such as sub-contractors and project partners delivering educational and employment support services on our behalf; website hosting; email services; marketing; other promotions; auditing; payment processing; fulfilling customer orders; data analytics; providing customer support; conducting customer research and satisfaction surveys; and other services that assist us in providing our services. These companies are obligated to protect your information and may be located wherever we operate.

Legal compliance and security

It may be necessary - by law or as a result of legal process, litigation, or requests from public or governmental authorities within or outside your country of residence - for us to disclose personal information. We may also disclose personal information if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose personal information if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.



European Union

European
Social Fund



**WORKING
FUTURES**

FOR MORE INFORMATION

- If you would like to know more about the Working Futures project, our partners involved in its delivery, how they use your data, why they need it and it will be stored and used, please visit www.workingfutures.org.uk.
- If you would like to view the DWP's Personal Information Charter and privacy notices in relation to ESF, please visit www.gov.uk/dwp/personal-information-charter.
- 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>

Contact Details

If you have any questions, queries or complaints, and to exercise your personal data rights, please in the first instance contact the Data Protection Officer at the Department of Works 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.

If you require any further information please contact **Greenbank's Data Protection Officer** on **0151 733 7255**.



Cookies

What are cookies?

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site on how the website is being used. They do not include personal information about you.

Cookies used on our website

Cookie	Name	Expiry	Purpose
DYNSERV	Dynserv	Session	Used by a load balancer to improve performance of the website.

Third Party Cookies

Cookie	Name	Expiry	Purpose
Universal Analytics (Google)	_ga	2 years	Used to collect information about how users use our website. This information is used to help us improve the user experience of the website. The information collected is anonymous and is not used to identify you. Information collected includes number of visitors, where they were referred from and which pages they visited. Google Privacy Policy
	_gat	Session	
	_gid	Session	



European Union

European
Social Fund



**WORKING
FUTURES**

How can I control my cookies?

Browser controls

You can use your web browser to:

- delete all cookies
- block all cookies
- allow all cookies
- block third-party cookies
- clear all cookies when you close the browser
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data
- install add-ons and plug-ins to extend browser functionality

Where to find information about controlling cookies

- [Internet Explorer cookies information](#)
- [Chrome cookies information](#)
- [Firefox cookies information](#)
- [Safari cookies information](#)
- [Opera cookies information](#)