

Merthyr Tydfil County Borough Council
INSPIRE 2 ACHIEVE
INSPIRE 2 WORK

This notice has been written in accordance with the General Data Protection Regulations and relevant legislation.

Information Governance Team

Lisa Richards - Data Protection Officer

Sam Bishop - Data Disclosure and Records Officer

Rebecca Walsh - Data Disclosure and Records Officer

Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN

Data.Protection@merthyr.gov.uk , 01685 725000



Cyngor Bwrdeistref Sirol
MERTHYR TUDFUL
MERTHYR TYDFIL
County Borough Council

Date Created: 25 May 2018
Responsible Department: Community Wellbeing Department
Responsible Manager: Jaime Spooner
Address: Unit 5, Pentrebach, Merthyr Tydfil, CF48 4TQ

This privacy notice provides information on how Merthyr Tydfil County Borough Council collects and processes your personal data when you access our Inspire projects. Merthyr Tydfil County Borough Council is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services. We may update this notice at any time if we do we will ensure that an updated copy of this notice is made available to you as soon as reasonably practical.

It is important that you read this privacy notice together with our Privacy Standards Policy and full privacy notice which contains more detailed information about our data processing and can be accessed on our website.

This notice relates specifically to the Inspire 2 Achieve and Inspire 2 Work projects. These Projects are funded by the European Social Fund (ESF). The Inspire projects operate from a number of locations throughout the borough, but mainly the Neighbourhood Learning Centre and Pen-y-dre Community Education Centre.

1. IMPORTANT INFORMATION AND WHO WE ARE

Merthyr Tydfil County Borough Council is the controller and responsible for your personal data. The Welsh Government is the administrative body of the ESF; Blaenau Gwent County Borough Council receives the funding directly from Welsh Government and allocates it to our Council. The Council is made up of different departments, details of which can be found on our website. When we mention the Department, we are referring to the Inspire Project Teams who are responsible for processing your data which will be clear to you when you access this Department for services.

This notice applies to service users of our Community Wellbeing Department, which includes young people up to the age of 25. The services offered to those accessing the Inspire 2 Achieve project are

aimed at individuals aged between 11 and 19. The Services offered to those accessing the Inspire 2 Work project are young people aged between 16 and 24.

Merthyr Tydfil County Borough Council has appointed a Data Protection Officer who can be contacted using the following details:

Lisa Richards (Data Protection Officer)

Address: Information Governance Team, Merthyr Tydfil County Borough Council, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN

Email: data.protection@merthyr.gov.uk

Tel: 01685 725000

2. THE DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity and contact data such as name, address, telephone number, email address, date of birth, age and gender in order to contact you regarding the service you are participating in.
- Identification numbers such as your national insurance number to assist you with completing application forms or helping you financially.
- Financial data, such as family income or benefits data in order to assist our service users to get the financial assistance they require.
- Employment and education data such as the school or college you attend including whether you are at risk of being not in education, employment or training (NEET) (please see our NEET Privacy notice) or if you are currently working. We also hold details of your qualifications or whether you require assistance in obtaining qualifications or entry into college.
- Lifestyle data such as your religion or ethnicity for equal opportunities monitoring. We also ask for information relating to your family background and whether you have caring responsibilities.
- Health data we ask for basic information to establish whether there is a medical reason why you are unable to engage in education and employment, or whether your health conditions may impact your ability to secure employment.
- Criminal offenses data in the event that you have notified us of any criminal convictions or if you are a prison leaver we will ask you for the details of your offence in order to protect the safety of our staff.

We explain the different methods used to collect data about you within this notice.

3. HOW WE USE YOUR PERSONAL DATA

We will collect your personal data in a number of ways, primarily through yourself, who would be classed as our service user. You will be asked to complete a Participant Enrolment Form for both Inspire Projects in order for the Service to register you as a service user. We may also receive referrals into our Department from your parents or a carer, from your school or college if they have reason to believe you require additional support in obtaining qualifications or securing employment. There are occasions where other projects within the Councils Community Wellbeing Department may make a referral on your behalf; these will only be made where the law allows them too. The Department also works closely with Careers Wales, the Department of Work and Pensions, and other third sector organisations, listed below, who may also make a referral on your behalf.

A referral is made using the allocated forms and will be submitted to the Department which is based in the Neighbourhood Learning Centre and at Pen-Y-Dre Community Education Centre. Once the referral form has been received you will be assessed. The assessment criteria for Inspire 2 Work operate on a tiered system, 1 being high risk and 5 being no risk of being NEET. You have to be considered as NEET in order to become enrolled within Inspire 2 Work. The assessment criteria for Inspire 2 Achieve operate on a traffic light system, red being high risk and green no risk of NEET. You have to be red in order to become enrolled within Inspire 2 Achieve.

The personal data we receive is transferred into our electronic system known as CAPITA One, which is also used as an early identification toolkit. Access to this system is restricted, only authorised personnel can view, amend or delete your data.

We will only use your personal data in order to provide you with the service you require. This is to ensure that we are able to enrol you on to the Inspire Projects. We will provide you with the support you need during your time spent within the Project. We will ensure that you receive relevant information regarding how we can support you during enrolment.

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

1. Where we have received your consent to provide you certain services such as responding to and considering any complaints made by you or your representative regarding the service you have received.
2. Where we need to comply with a legal obligations under the following laws
Learning and Skills Act (2000)
The Education and Inspections Act 2006
The Children and Young Persons Act 1963
The Social Services and Wellbeing Act (Wales) 2014
3. Where it is needed in the public interest or for official purposes such as providing statistical returns to the Welsh Government, and to enable us to contribute to the commitments made by the Welsh Government in its National Strategy, Prosperity for All and the National Youth Work Strategy for Wales 2014–2018 and the Taking Wales Forward 2016-2021 Strategy.

4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Participation in the project is voluntary. Please note that we may process your personal information without your knowledge or consent where this is required or permitted by law.

4. HOW WE SHARE YOUR PERSONAL DATA

We may share your personal data across the Community Wellbeing Department in order to provide you with the support you require, we will also share your data internally across other Council Departments and also with external third parties which include:

The Education Inclusion and ALN Service
Community Wellbeing Department
Children's Services
Bridges into Work
Afon Taf High School
Cyfarthfa High School
Pen-Y-Dre High School
Bishop Hedley High School
Greenfields Special School
Central South Consortium
Careers Wales
College Merthyr Tydfil
Coleg Cymoedd
Coleg Gwent
Tydfil Training Consortium
College Merthyr Tydfil Work Based Learning
Voluntary Action Merthyr Tydfil
Gellideg Foundation
Cwm Taf Youth Offending Service
Communities for Work and Communities for Work plus
Blaenau Gwent County Borough Council
Bridgend County Borough Council
Torfaen County Borough Council

We will share anonymised, statistical and complete sets of personal data on a quarterly basis regarding your participation in the projects provided by the Service with Blaenau Gwent County Borough Council as they are the lead authority for the Inspire Projects. Blaenau Gwent County Borough Council will share this information with the Welsh Government for research and statistical analysis performed in order to improve the care and support provided to people in Wales. In relation to the equal opportunities data we collect from you we act as a sub-processor for Blaenau Gwent County Borough Council.

The Inspire Projects are funded by the European Union; we will not transfer your data to any countries outside of the EU. If we do we will inform you as soon as possible and you can expect a similar degree of protection in respect of your personal information.

5. HOW LONG WILL YOU USE YOUR INFORMATION AND KEEP IT SECURE

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. ESF Grant Recipients are required to provide records to evidence that the expenditure in claims complies with the relevant regulations, rules and terms of the Funding Agreement, to enable the Managing Authority to meet its reporting obligations and to demonstrate compliance with European Union requirements.

The Inspire Projects therefore are required to retain the information a minimum of two years after the Welsh Government submits the Annual Control Report in which the final expenditure for the completed project is included. To minimise risks of miscalculation and support Grant Recipients and the Managing Authority in simplifying processes, all projects under the ESF 2014-2020 Programme must ensure they keep all documents for 10 years after their final ESF claim is paid by the Welsh Government.

Details of retention periods for different aspects of your personal information are available in our Records Management Policy which is available on our website (www.merthyr.gov.uk).

We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

6. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data these rights may include a right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes

you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you have any concerns about how the Council processes your personal information or if you believe the Council has not complied with these rights you are able to make a complaint to the Councils Data Protection Officer using the details above. You also have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues:

Address: Information Commissioner's Office (Wales), 2nd Floor, Churchill House, Churchill Way, Cardiff, CF10 2HH
Email: casework@ico.org.uk
Tel: 029 2067 8400

7. FURTHER DETAILS

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing basis, please access our full privacy policy.