

SEFTON CVS: INCLUDE-IT MERSEY PROJECT PRIVACY NOTICE

WHO WE ARE

Include-IT Mersey is a community-based Digital Inclusion project helping people to get online across the Liverpool City Region.

Funded by the UK Government, through the UK Shared Prosperity Fund, with the Liverpool City Region Combined Authority (LCRCA) as the lead authority, the project provides basic digital skills training and inclusion support to digitally excluded residents of the Liverpool City Region (LCR).

Delivered across all 6 LCR boroughs, the partnership brings together organisations from the Voluntary, Community, Faith and Social Enterprise (VCFSE) sector to support people in their local communities to develop basic IT skills and get online. The project is managed by Sefton CVS, in partnership with VOLA and 10 of its member organisations who deliver community-based digital skills training.

At Sefton CVS, we are committed to maintaining the trust and confidence of all staff, learners and other service users. In particular, we want you to know that Sefton CVS is not in the business of selling, renting or trading your personal information with other organisations for marketing purposes, or using it for any other purpose than is necessary to provide you with the services you have requested, or to fulfil our contractual or legal obligations.

If you want further reassurance, please see our full Privacy Notice that covers all of our business and services (<https://seftoncv.org.uk/sefton-cvs-privacy-notice/>).

In this Privacy Notice, we provide 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 project Delivery Partners are also not in the business of selling, renting or trading your information with other organisations for marketing purposes. They are contractually bound to treat your personal information with the same level of care and safety as we do.

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 Include-IT Mersey project;
- when you apply to enrol on the Include-IT Mersey 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 project participant.

THE TYPES OF INFORMATION WE COLLECT IN RELATION TO YOUR PARTICIPATION IN THE INCLUDE-IT MERSEY PROJECT; HOW AND WHY WE USE IT

Sefton CVS and its Delivery Partners collect, store, use and report different types of personal data / information from or about you. This falls in to two categories:

1. Some of this data/ information is a contractual requirement of our funders, the Liverpool City Region Combined Authority (LCRCA). In turn, the LCRCA may report anonymised data/ information to the Department for Levelling Up Housing and Communities (DLUHC), as the Managing Authority for UKSPF in England.
2. Other personal information, above and beyond that contractually required by the LCRCA, 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 UKSPF monitoring/ reporting purposes.

As part of our funding agreement with the LCRCA, we are contractually required to collect, store and report a range of personal data/ information in relation to learners' participation with the project. Only **anonymised** monitoring data/ information is reported to our funders. Individual learners will never be personally identifiable to our funders from the data/ information we submit to them. The types of data/ information we collect, store and report to funders include:

- Your age – you must be aged 16+ to be eligible to take part in the project
- Which Local Authority area you live in – you must live in one of the 6 boroughs of the Liverpool City Region to be eligible to take part in the project
- Your digital ability – you must be “digitally excluded” to be eligible to take part in the project
- Your Gender – *although you may state that you “prefer not to say”*
- Your Ethnicity – *although you may state that you “prefer not to say”*
- Whether you consider yourself to have a disability, learning difficulty or long-term health condition – *although you may state that you “prefer not to say”*
- Information relating to your previous educational attainment, current employment status; plus outcomes achieved as a result of your participation in the project, such as whether you completed the course and/or qualifications achieved.

2. Other data/ information collected

To aid our delivery of the project, Sefton CVS and its Delivery Partners also collect, store and use some additional data and information above and beyond that we are contractually required to collect. 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:

- Your name and contact information such as address, email address and telephone number(s), as well as your date of birth and national insurance number. We will also allocate you a unique learner number.
- Your gender – *although you may state that you “prefer not to say”*
- Information about your family and personal circumstances, such as the work status of others in your household – *although you may state that you “prefer not to say”*
- Sensitive, personal information – *although you may state that you “prefer not to say”* - including:
 - Whether you have a history of offending
 - Information concerning your health and medical conditions (e.g. disability, learning difficulty, dietary or other health related needs).
- 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; confidence; existing IT (computer) skills; and housing status.
- Your feedback and views of the course.
- Details of any work or further education/ training you progress to following your participation in the course, including the name of the employer or college/ training provider, the job title/role, or the course/qualification you have progressed to, and the start date.

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

IDENTITY OF THE DATA CONTROLLER

In respect of all of the above data and information (parts 1 and 2), Sefton CVS is the “data controller” and our project Delivery Partners are the “data processors”.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

The lawful basis for processing your data and information is ‘Consent’; which means that you have to give us clear consent for your personal data to be processed.

Note that you may withdraw your consent at any time by contacting Sefton CVS’s Data Protection Officer using the contact details provided later in this document.

YOUR RIGHTS

Under the General Data Protection Regulations (GDPR), “data subjects” (*you, as a participant on the Include-IT Mersey project*) have the right to access and amend any of their personal data Sefton CVS holds.

You also have the following rights:

- The **right to be informed** about our processing of your personal data;
- 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’)
- 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’)**;
- 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/>.

HOW WE SHARE YOUR INFORMATION

When we provide you with a service(s), we will share your records with the people providing you with that service or checking the quality of your service (unless you have asked that we limit how we share your records).

We will not share information that identifies you for any reason other than providing your service(s), unless:

- You ask us to do so;
- We ask and you give us specific permission;
- We have to do this by law;
- We have special permission because the public good is thought to be of greater importance than your confidentiality.

We sometimes share personal information with organisations that provide services on our behalf, such as sub-contractors and project delivery partners. These organisations are obligated to protect your information in the same way that we do.

We may also, on occasion, share your information with other partner agencies who deliver additional services that are likely to be beneficial to you; we will usually seek your specific permission to do this. If we share information without your permission, we will make sure that we keep to the General Data Protection Regulation 2016, Data Protection Act 2018, Human Rights Act 1998 and the common law duty of confidentiality and national guidelines on best practice.

CONTACT DETAILS OF OUR DATA PROTECTION OFFICER

Queries should be directed to:

Adele Browne – Compliance, Governance and HR Officer,
Sefton CVS
Suite 3b, 3rd Floor, North Wing, Burlington House
Crosby Road North
Waterloo
Liverpool, L22 0LG
Tel: 0151 920 0726 ext. 235
Email: adele.browne@seftoncvcs.org.uk

INFORMATION COMMISSIONER

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.

<https://ico.org.uk/>

WHO'S INVOLVED IN THE PROJECT AND PROCESSING YOUR PERSONAL DATA/INFORMATION

Organisation	What data will they collect/receive?	Why do they need the data?	How will the data be stored/used
<p>Training Delivery Partners (“Data Processors”)</p> <ul style="list-style-type: none"> - Age UK Wirral - Alt Valley Community Trust - Everton Development Trust - Greenbank Project - Granby Toxteth Development Trust - Independence Initiative - Rotunda - Speke Training and Education Centre - Torus Foundation - Workers Educational Association 	<p>The training provider you register with will collect all data and information, as outline in the Privacy Notice, required to deliver the project and help support you.</p>	<p>They collect this data at the request of the Data Controller (Sefton CVS, Project Lead) to ensure:</p> <ol style="list-style-type: none"> 1. Your eligibility for the project before the training can begin; 2. Compliance with the monitoring and reporting requirements of our funders; 3. That they can tailor their support to suit your needs. 	<p>Individual partners store paper copies of forms containing your data/ information securely in locked cabinets, before transferring all original paper copies securely (generally in person, or by recorded/ registered delivery) to the Project Management Team at Sefton CVS.</p> <p>Forms may be electronically scanned by partners and sent to Sefton CVS via a secure online file sharing platform, prior to submission of the paper copies.</p> <p>Partners may also keep photocopies for their own records, which will be retained no longer than is necessary to comply with evidence retention requirements, after which they will be destroyed in a safe and secure manner.</p>

<p>Sefton CVS (Project Lead) <i>("Data Controller")</i></p>	<p>Sefton CVS receives from Training Delivery Partners all data and information, as outlined in the Privacy Notice, required to deliver the project.</p> <p>Ultimately, following processing by Training Delivery Partners, all data relating to all project participants will be retained by Sefton CVS, including both original paper copies, scanned copies and electronic personal data records (i.e. data from the forms entered onto a spreadsheet/ database).</p>	<p>Sefton CVS is the lead organisation for the Include-IT Mersey project/ partnership. It has overall responsibility for the project, including the processing, use, storage, reporting and destruction of your data/ information.</p> <p>Sefton CVS receives, processes and stores your data as part of our legitimate interest in delivering services to you.</p> <p>Sefton CVS uses your personal information to:</p> <ol style="list-style-type: none"> 1. Check/ confirm your eligibility for the project. 2. Fulfil our contractual obligations to the project’s funders in relation to participant monitoring and reporting requirements; 3. Monitor performance of the project in relation to contractual targets. 4. Monitor the quality of service provided by our Training Delivery Partners; and 5. Help us to provide, improve, and develop our services. <p>This includes using personal information for purposes such as data analysis, research, and audits.</p> <p>Such processing is based on the lawful basis of our legitimate interest in offering you services.</p>	<p>Paper copies of your data are held securely in locked cabinets. Scanned copies of forms and electronic personal data records are held securely on our IT network server, with password-protected access by authorised personnel only.</p> <p>Data/ records (physical paper copies and computer data) will be retained no longer than is necessary to comply with contractual data and evidence retention requirements, after which they will be destroyed in a secure manner.</p> <p><u>Case Studies</u> You may be asked if you would be willing to be included as a case study for the project to support publicity and evaluation. If so, we will always obtain your explicit consent.</p>
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