



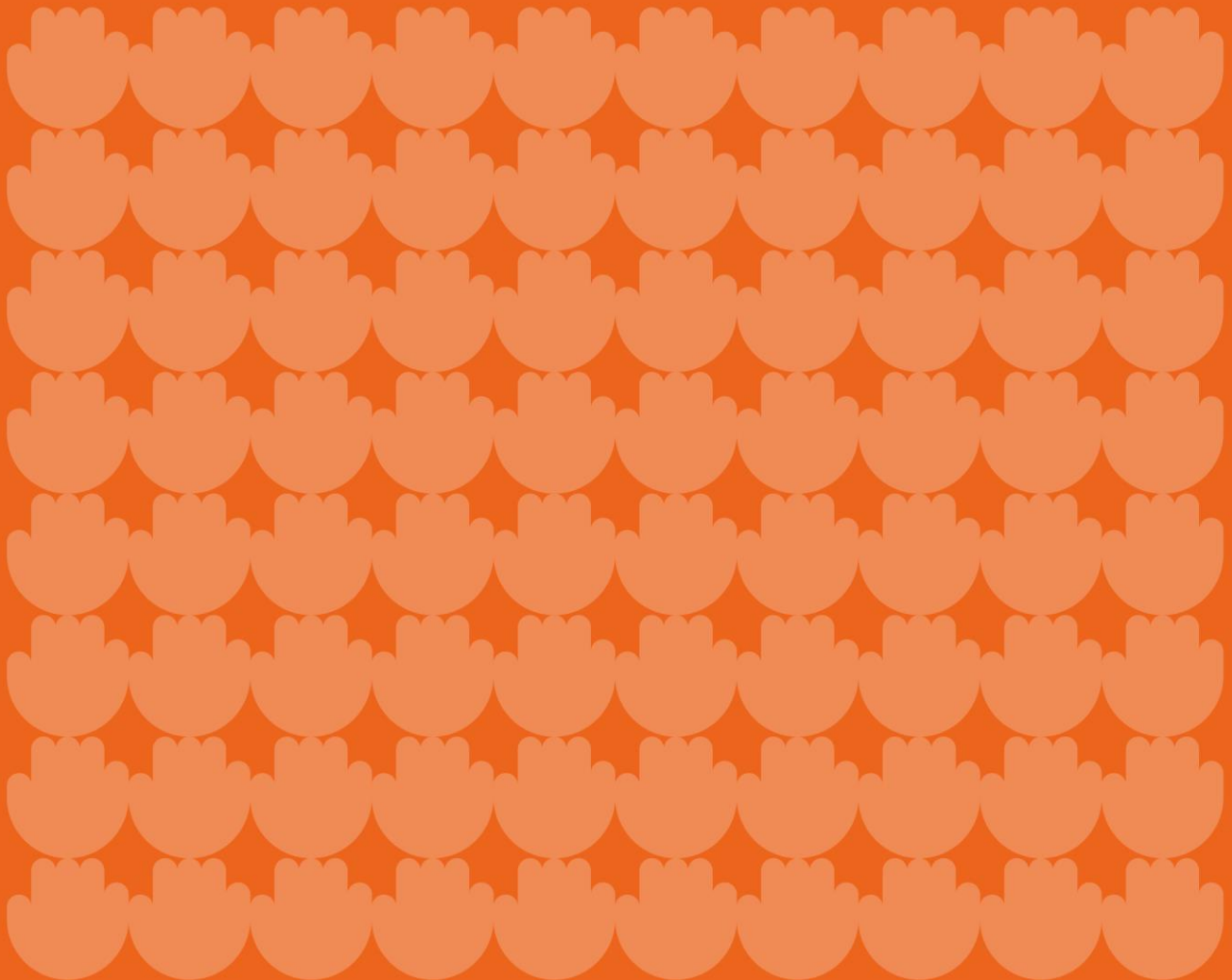
**SKILLS FOR  
GROWTH**  
DOING THINGS DIFFERENTLY FOR  
GREATER MANCHESTER'S WORKFORCE



**European Union**  
European  
Social Fund

# Privacy Notice for Skills for Growth – Skills Delivery

Date – Updated 13.05.22



## PRIVACY NOTICE FOR SKILLS FOR GROWTH – SKILLS DELIVERY

<b>Data controller:</b>	Greater Manchester Combined Authority, Churchgate House, 56 Oxford Street, Manchester M1 6EU
<b>ICO registration reference:</b>	Z5119967
<b>Customer enquiries contact details:</b>	<a href="mailto:officeofdpo@greatermanchester-ca.gov.uk">officeofdpo@greatermanchester-ca.gov.uk</a>
<b>Data Protection Officer:</b>	Phillipa Nazari, Greater Manchester Combined Authority

### 1. Who we are

The Greater Manchester Combined Authority (GMCA) is made up of the ten Greater Manchester councils (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan) and the Mayor of Greater Manchester.

The Skills for Growth programme has been designed by the GMCA to address occupational skills gaps identified from employers, who have continually highlighted that they cannot find the technical skills in Greater Manchester required to support and grow their businesses. In response, Greater Manchester has secured approximately £42million from the European Social Fund (ESF) to deliver a three year programme aiming to support more than 25,000 individuals (Skills Delivery) and over 3,000 businesses (SME Skills Support).

This privacy notice is for individuals who are thinking about enrolling, or have enrolled, on a training course funded by the Skills for Growth programme. It outlines the personal data we need to collect from you, how we will handle it and your rights under the data protection legislation.

There is a separate privacy notice, provided by the Growth Company, for businesses using the services provided as part of Skills for Growth – SME Skills Support: [Privacy policy Skills for Growth SME](#)

The Skills for Growth programme activities align with the general strategic Greater Manchester priorities around supporting business growth and delivering an integrated approach to employment and skills. In addition, it will support providers of education, employment, and training to better meet the needs of residents and employers through the creation of new partnerships and innovative methods of delivery. Further information about the programme is provided on our website, which is updated

regularly as the programme evolves: [Skills for Growth - Greater Manchester Combined Authority \(greatermanchester-ca.gov.uk\)](https://www.greatermanchester-ca.gov.uk)

## **2. What information we collect**

During enrolment and throughout the Skills for Growth programme, the GMCA needs to collect the following personal data from learners.

- Name (including Forename and Surname)
- Email Address
- Address (including postcode)
- Telephone number
- Date of Birth
- Gender
- Ethnicity
- National Insurance Number
- Employment status/ labour market status
- Employment details
- Education Background (including basic skills level, highest education attainment, last engagement in education)
- Household situation
- Disability status and health conditions
- Recipient of benefits
- Information on programme (qualification, hours of learning undertaking, start and end date of programme)
- End of course information (improved skills, qualification or employment status, progressed from the programme)

When enrolling on a course, learners are also required to present identity documents, such as their Passport, Driving Licence or Birth Certificate. These are used to confirm identity and check eligibility for the training course. Details from the documentation are recorded (e.g. Passport Number and expiry date) but full copies are not collected.

## **3. How we collect your information and who we will share it with**

To deliver training courses funded by the Skills for Growth programme, the GMCA has partnered with various Skills Delivery Partners. These Skills Delivery Partners are responsible for collecting the information listed above and sharing it with the GMCA. We use it to administer the programme, which includes sharing specified data with the Department for Work and Pensions (who are responsible for the European Social Fund in the UK). Collection and sharing of specific data with the DWP is necessary to ensure funding payments from the ESF.

Skills Delivery Partners are continually being procured throughout the programme. A list of current providers can be requested from: [skillsforgrowth@greatermanchester-ca.gov.uk](mailto:skillsforgrowth@greatermanchester-ca.gov.uk)

Further guidance on the European Social Fund, why the DWP needs personal information and how they handle it is provided at: [How the European Social Fund is helping you \(skillsforgrowthsmc.co.uk\)](http://skillsforgrowthsmc.co.uk)

We have also commissioned York Consulting as our Evaluation Partner, who help us to evaluate the impacts of the programme. We share certain information about learners with York Consulting to support this research. If you give your consent when registering for a training course, they may contact you to request additional information via focus groups, telephone interviews or feedback forms. Supporting the GMCA with this evaluation research has many benefits and your participation with the additional contact is greatly appreciated.

#### **4. Who is the Data Controller for personal data collected as part of the Skills for Growth programme**

The GMCA is the Data Controller for the personal data listed above. Our Skills Delivery Partners collect this on our behalf, acting as our Data Processor. York Consulting is also our Data Processor, acting on our behalf to evaluate the programme.

In some circumstances, our Skills Delivery Partners may need to collect additional information from you in relation to a training course they provide. If it was not a requirement of our contract with them, the Skills Delivery Partner is the Data Controller for such additional information. This includes any feedback they request from you on delivery of the training course, which they collect for their own continuous improvement purposes.

The Department for Work and Pensions is an independent Data Controller for personal data we share with them to ensure funding payments from the ESF.

#### **5. Our lawful basis for processing your personal data**

For processing personal data our lawful basis is:

Article 6 1(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

For processing special category data our lawful basis is:

Article 9 2(g) processing is necessary for the reasons of substantial public interest

The information we collect is used to ensure that the GMCA is meeting its contractual requirements under European Social Fund and that we can evidence compliance. The information is also used to ensure that GMCA can evaluate the impact of the programme, to ensure the funding is being used in the best interests of the residents and business within Greater Manchester.

## 6. How we ensure the security of your personal data

The GMCA is committed to the security of your personal information. We aim to ensure that we have appropriate physical, technical, and organisational controls in place to protect all personal data we collect or receive. For example, ensuring our network is protected and monitored. All our employees receive training on how to handle personal data securely.

Where we use external companies to collect or process data on our behalf, we carry out comprehensive checks before we work with them and ensure that contracts are in place that set out our expectations and requirements.

## 7. How long we will keep your information

The European Social Fund funding requirements state that all electronic and paper-based documents must be stored for 10 years after the closing of the programme in 2023. The GMCA will comply with this requirement.

## 8. Your information rights

The GMCA must comply with the UK General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

Under data protection law, your rights include:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request, please contact us at:

Email: [officeofdpo@greatermanchester-ca.gov.uk](mailto:officeofdpo@greatermanchester-ca.gov.uk)

Postal: Office of the DPO GMCA, Churchgate House, 56 Oxford Street, Manchester, M1 6EU

The GMCA will only be able to comply with your rights in relation to the information they have collected.

## **9. How you can make a complaint**

If you are not satisfied with how the GMCA is using the information we hold about you please contact our Data Protection Officer by emailing: [officeofdpo@greatermanchester-ca.gov.uk](mailto:officeofdpo@greatermanchester-ca.gov.uk).

If you are still not satisfied with the GMCA's response to any request to exercise your individual rights or if you believe that the GMCA is not processing your personal data in accordance with the law, you can contact the Information Commissioners' Office:

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Online: <https://ico.org.uk/make-a-complaint/>

For more details on how the GMCA use data please visit our website: <https://www.greatermanchester-ca.gov.uk/who-we-are/publication-scheme/privacy-policy-and-data-protection/>