

Nottingham Trent University – Privacy Notice **High Level Skills for SMEs – ESF Funded Programmes**

Introduction

Your privacy and protection of your personal information is very important to us and we are committed to robust compliance with the General Data Protection Regulation (“**UK GDPR**”) and the Data Protection Act 2018.

This privacy notice explains what Nottingham Trent University (“**NTU**”, “**we**”, “**us**” or “**our**”) does with your personal information, your rights and how we protect it. This notice is for all individuals (“**you**” or “**your**”) involved in one of the four ESF High Level Skills Projects.

The ESF High Level Skills Programme consists of four **European Social Fund** funded projects, delivered in partnership with the Department for Work and Pensions and a consortium of partners, of which Nottingham Trent University is the Lead Partner. The Projects are primarily for small and medium-sized businesses in Nottinghamshire and Derbyshire who want to benefit from expertise to improve employment opportunities, strengthen social inclusion, fight poverty, promote education, skills and life-long learning and develop active, comprehensive and sustainable inclusion policies and thereby contribute to economic, social and territorial cohesion.

For more information about the High Level Skills Programme and the support available to businesses from NTU, [visit our website](#).

The four ESF High Level Skills Projects are:

Priority Skills for D2N2 SMEs (Project Number: 08S17P0047), we work in collaboration with the following Partners:

University of Derby
Kedleston Road, Derby DE22 1GB

Nottingham College
The Adams Building, Stoney Street,
The Lace Market, Nottingham, NG1 1NG

Derby College
Roundhouse Road, Pride Park, Derby,
DE24 8JE

Vision West Nottinghamshire College
Derby Road, Mansfield, Nottinghamshire,
NG18 5BH

GRADS for D2N2: Graduate Retention And Delivering skills for SMEs Project (Project Number: 08S17P00475), we work in collaboration with the following Partners:

University of Derby
Kedleston Road, Derby DE22 1GB

Nottingham College
The Adams Building, Stoney Street,
The Lace Market, Nottingham, NG1 1NG

Derby College
Roundhouse Road, Pride Park, Derby,
DE24 8JE

Vision West Nottinghamshire College
Derby Road, Mansfield, Nottinghamshire,
NG18 5BH

Nottingham City Council
Loxley House, Station Street,
Nottingham, NG2 3NG

Smart and Inclusive Leadership (Project Number: 08S21P04137), we work in collaboration with the following Partners:

University of Derby
Kedleston Road, Derby DE22 1GB

Derby College
Roundhouse Road, Pride Park, Derby,
DE24 8JE

Workers Educational Association
39 Mapperley Road, Nottingham, NG3
5AQ

Nottingham College
The Adams Building, Stoney Street,
The Lace Market, Nottingham, NG1 1NG

**The Voluntary and Community Sector
Learning and Skills Consortium T/A
Enable**
Carlton Road Business Centre, 27-31
Carlton Road, Nottingham, NG3 2DG

East Midlands Chamber
Commerce House, Millennium Way,
Dunston Road, Chesterfield, Derbyshire,
S41 8ND

Branch Out in STEM (Project Number: 08S20P04136), we work in collaboration with the following Partners:

University of Derby
Kedleston Road, Derby DE22 1GB

Derby College
Roundhouse Road, Pride Park, Derby,
DE24 8JE

Inspire
Eastbourne House, Station Road, Sutton
in Ashfield, Nottinghamshire, NG17 5JA

Nottingham College
The Adams Building, Stoney Street,
The Lace Market, Nottingham, NG1 1NG

**The Voluntary and Community Sector
Learning and Skills Consortium T/A
Enable**
Carlton Road Business Centre, 27-31
Carlton Road, Nottingham, NG3 2DG

East Midlands Chamber
Commerce House, Millennium Way,
Dunston Road, Chesterfield, Derbyshire,
S41 8ND

Who we are

For the purposes of the UK GDPR, NTU is a “controller” which means we are responsible for deciding how we hold and use personal information about you.

You can find us in the Information Commissioner’s register of organisations who have paid the Data Controller fee [here](#).

The Department for Work and Pensions (DWP) – **Managing Authority for ESF in the UK** is also a ‘controller’ in respect of personal information processed as a result of participation in any of the ESF Projects. Further information about how DWP hold and manage personal data can be found [here](#).

If you have any questions about the use of your personal information within either of the Projects, or wish to exercise your rights, please contact:

Compliance Officer, ESF High Level Skills
Email: ESF-HLSadmin@ntu.ac.uk

Data Protection Officer
Email: DPO@ntu.ac.uk

We may need to update this Privacy Notice from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes.

The Personal Information we hold on participants

NTU and our Project Partners are committed to the responsible handling and protection of personal information. As a participant, you may be involved in the Project directly with NTU or through one of our Project Partners. We will hold a range of information relating to participants to enable us to manage and deliver the Projects. This includes:

- Your name and employment contact details, such as job title, address, telephone number and email address;
- Educational achievements;
- Equal opportunity and diversity monitoring information such as ethnicity, disability status, and gender identity;
- attendance and participation in activities;
- photographs where you are participating in activities.

In some circumstances, we collect, store and use "special categories" of more sensitive personal data, which may include:

- Health information including medical conditions and disability status – we may use health information to help us to make reasonable adjustments to improve our service to you; to ensure our engagement with you is based on a suitable understanding of, and respect for, your particular circumstances.
- Race or ethnicity – we may use this information to support equal opportunity and monitoring purposes.

We will also collect business details such as ownership details, registered company number, date of incorporation, name of employer and address, number of employees and company turnover.

Why we process your personal information

We process the personal information to enable us to assess your suitability for and deliver the Projects.

How we use your personal information

We will use your personal information to allow us, the Partners or relevant third parties to assess you and your organisation's eligibility for the Projects and carry out the necessary checks.

We will use your personal information for the administration of your involvement in the Projects and to keep in touch with you and to provide you with information about the Projects and the benefits available to you (and your employer where applicable).

We will also use your information to provide statistics through the research undertaken as part of the Projects. This will be through anonymisation; you will not be able to withdraw consent with regard to participation in the Projects after this point.

The lawful basis for undertaking the Projects is task in the public interest, contract, consent, legitimate interests and legal obligation. For some forms of contact and invitations of support we will seek your consent.

Sharing your personal information

Beyond individual departments and functions of us directly, some or all of the personal information relating to participants will be shared with our Project Partners. As the Project Lead Partner, we will hold personal information provided as part of an individual's involvement within the Projects.

In line with our requirements under the European Regional Development Fund, all personal information we collect will be shared with the Managing Authority of the Projects, DWP and will be used to evaluate the Projects and report to us and the ESF for

monitoring purposes. Your personal information may also be shared with research organisations working on behalf of DWP who may contact you during or following your involvement in a Project for research purposes. DWP will also use your personal information to link to official records in order to monitor your employment status for up to 6-12 months following the end of the ESF support through your involvement in the Project.

In addition personal information will be shared with external project auditors and project evaluators for the purposes of checking eligibility, compliance with ESF and State Aid Regulations and for audit purposes. All such third parties are prohibited from using your personal information except to provide these services to NTU, and they are required to maintain the confidentiality of your information. We ensure such third parties handle your information in accordance with the UK GDPR.

Your personal information will not be shared for commercial or marketing purposes.

Where necessary we will share information required by law or in the public interest, with, for example, the police or HM Revenue and Customs, any relevant regulator or to exercise or defend our legal rights.

Where information is shared outside the UK and European Economic Area we take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. When we transfer personal information from the UK to other countries in which applicable laws do not offer the same level of data privacy protection as in the UK, we take measures to provide an appropriate level of data privacy protection.

Anonymised data is likely to form part of a research publication, conference presentation or public talk.

Retaining your personal information

We will not store your personal information for longer than is necessary to fulfil the purposes for which we collected it. This may mean holding on to your personal information for a certain period of time after you have ceased to have a relationship with us, such as for the purposes of satisfying any legal, accounting, or reporting requirements for the Projects.

When determining the appropriate period of time to retain your personal information, we consider several factors, including the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we handle and use your information and whether we can achieve those purposes through other means, and the applicable legal requirements. We securely erase your information once it is no longer needed.

We will ensure that our partners and selected third parties with whom we share your personal information in accordance with this Privacy Notice will retain your personal information in line with the requirements of the funding body and will delete your personal information when they no longer require it.

We will not store your personal information for longer than is necessary. NTU will ensure that our partners and selected third parties with whom we share your personal information in accordance with this Privacy Notice will retain your personal information in line with the requirements of the funding body and will delete your personal information when they no longer require it.

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Security of your personal information

We and our Partners have in place appropriate security measures to prevent your personal data 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 and other third parties who have a legitimate need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Your rights

You have a range of rights over your personal information. Under certain circumstances, by law you have the 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.
- **Request correction** of any inaccuracies relating to your personal information we hold about you.
- **Request erasure** or deletion of your personal information when it is no longer required.
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that 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 or suspension** 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.
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Request the transfer** of your personal information to another party.

If you wish to exercise your personal data rights or have any questions about how we use your data, please get in touch using the contact details at the top of this Privacy Notice.

If you believe that we have failed to manage your personal data appropriately, you have the right to complain to the statutory regulator – The Information Commissioner's Office. The ICO contact details are: <https://ico.org.uk/global/contact-us/>

This privacy notice was last updated on 25 May 2021