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Data Protection Policy

Version 2

August 2022



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This policy has been adapted specifically for the delivery of the LCR Grad Scheme project which is delivered by a project team based at the University of Liverpool. This policy reflects the principles and governance of the University of Liverpool Data Protection Policy, as detailed below. This policy can be found [here](#).

The project is part funded by the European Social Fund.

Version History

Version	Date	Author / Role
1	September 2021	Kerry McElroy – Project Manager, LCR Grad Scheme
2	August 2022	Kerry McElroy – Project Manager, LCR Grad Scheme
3	January 2023	Greg Hunter – Project Manager, LCR Grad Scheme
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The information you provide to the LCR Grad Scheme and University of Liverpool will be shared with the Department for Work and Pensions (DWP) and used to evaluate this project and to report to the LCR Grad Scheme and European Social Fund for monitoring purposes, in line with European Commission regulatory requirements.

Your information will also be shared with research organisations working on behalf of the Department for Work and Pensions who may contact you to discuss your involvement in the project for research purposes. Participation in research is voluntary and you will be asked to consent before taking part in any research activity you may be contacted about.

The DWP 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.

Data will not be used or shared for any commercial or marketing purposes.

At all times your information will be kept securely, and nobody will have access to it that shouldn't.

General Data Protection Regulation and the lawful basis for processing

For the purposes of the General Data Protection Regulation (GDPR), the DWP is the data controller in respect to information processed which relates to all participation in the European Social Fund. As they are ESF grant beneficiary organisations, the LCR Grad Scheme and University of Liverpool are data processors in respect to information processed which relates to Participants in the operation and projects funded by the European Social Fund.

DWP is not the controller for any other/ additional data collected by the LCR Grad Scheme and University of Liverpool that is not essential for delivering the ESF programme, or for any personal data that would normally be collected anyway by the LCR Grad Scheme and University of Liverpool.

The ESF Programme Action Note 018/18

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/710894/02018_GDPR_and_ESF_additional_advice.pdf

sets out the lawful basis for processing personal data under ESF.

Retention periods for personal data

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).

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:



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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832230/ESF_Document_Retention_Guidance.pdf

The rights available to individuals in respect of the processing

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.

More information about how and why DWP uses your personal information, including how to ask for a copy of the personal information DWP holds about you can be found in DWP's Personal Information Charter at:

<https://www.gov.uk/government/organisations/department-for-work-pensions/about/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>

Information that the LCR Grad Scheme will report on

Information collected through your application and further activities on this project will be collected and provided to the Managing Authority, DWP and the European Social Fund as evidence of your participation.

LCR Grad Scheme will provide statistical information to a number of organisations as specified below, and may report on the Scheme as a whole, or on cross sections of the Scheme such as the numbers of participants for individual boroughs and from specific groups. The information will not include your personal contact details and will not mention you by name, or any other identifiable information. We will not provide information on individuals other than in an anonymised format, except for evaluation purposes as mentioned below.

Anonymised information will NOT include your name, address, National Insurance number, telephone numbers or email address.

We will report on statistical information that may include the following:

Start Date; Gender; Date of Birth; Post Code; LCR Residence details; housing status; Labour Market Status; Length of unemployment (if applicable) Equalities characteristics; Highest level of qualification held at start; Basic Skills requirement (if applicable); Leaving Date; Support received; Qualifications achieved; Destination information.

Organisations with which the LCR Grad Scheme will share statistical (non-personal) information could include the Department for Work and Pensions (DWP), LCR'S Co-financing Organisations (The University of Liverpool), LCR Councils and local authorities and third-party service providers, recruiting businesses in advance of interviews, for purposes only closely connected with the project.



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Information used for LCR Grad Scheme evaluation purposes

The LCR Grad Scheme will pass your personal contact details and personal data on to an organisation which will be responsible for evaluating this European Social Fund (ESF) programme and to DWP evaluators. Data presented in the evaluation reports will be presented in an anonymised format and you will not be mentioned by name or any other identifiable information. If contacted by the LCR Grad Scheme, ESF or DWP evaluation organisation, you may refuse to be included in the evaluation.

Information used for LCR Grad Scheme monitoring and audit purposes

The information held on your application, and on other documentation generated during your time on this project, will be made available to organisations solely for the purposes of monitoring and auditing the activities carried out on the project. The organisations that may access information include: LCR Grad Scheme, project sponsors, DWP and their appointed auditors, the European Commission and their appointed auditors. They may produce reports about the project, but they will not mention you by name or any other identifiable information.