



**CAMBRIDGESHIRE
& PETERBOROUGH**
COMBINED AUTHORITY

Adult Education Budget, Free Courses for Jobs, and Multiply Privacy Notice for the Purpose of Data Collection

Who we are.

The Cambridgeshire and Peterborough Combined Authority (the “**CPCA**”) is responsible for commissioning and funding the adult education budget provision (the “**AEB**”), Free Courses for Jobs (the “**FCFJs**”) and Multiply (the “**Multiply**”) for learners within the CPCA region and may therefore need to use your personal information in the delivery and evaluation of this work in accordance with the terms and conditions of funding imposed on providers of learning, for example, further education colleges and private training organisations.

Why we collect your personal information.

Personal information is collected from Training Providers, who deliver the training courses. Information is collected for research purposes, contract management assurance purposes and to prevent the risk of fraud. Any information shared publicly will be anonymised so you cannot be identified. We may publish the findings for use by other relevant organisations and for the purposes of transparency in how we are using public funds. None of your individualised data will be identified. Your personal information is collected to enable us to carry out the functions of the CPCA.

The lawful basis for collecting and using your personal information will depend on the type of skills programme you are enrolling onto. We will collect your personal information solely where we:

- Need to for the purpose of delivering the AEB, FCFJs, and Multiply
- Have your consent to do so
- Have a legal obligation to do so

We may use personal data we collect to:

- Send you information about our work
- Improve the services we offer to you
- Operate our complaints policy
- Contact you for feedback on services we provide to you
- Promoting new (free) course offerings such as the Level 3 Adult Offer and Multiply
- Inviting learners to join Focus Groups

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- Destination survey
- Create case studies for marketing purposes
- Contact you regarding a course you have enrolled on that is funded by CPCA, to gather feedback on the course or training provider that delivered the course.
- Research and interview purposes

How we share your personal information

The CPCA will process your personal information, which will enable CPCA to carry out the required checks. Personal information collected from course participants is treated as confidential and collected for research purposes, contract management assurance purposes and to prevent the risk of fraud. Any information shared publicly will be anonymised so you cannot be identified. DfE (and its contracted research organisation) will use the data for policy development and to help improve education services. We may publish the findings for use by other relevant organisations and for the purposes of transparency in how we are using public funds. None of your individualised data will be identified. As part of the data collection, we may collect the following information from Providers for our Multiply delivery;

- national insurance number
- first name
- surname
- postcode
- date of birth
- education and qualifications information
- earnings and employment information
- benefits information
- caring responsibilities

The special category data we may be processing includes:

- gender
- disability
- ethnicity

If participants decide they do not want their data used on an ongoing basis for research, they can notify The Authority and their Training Provider and withdraw from the training. No further data will be collected/linked on that individual beyond that point.

Where you have registered your information on the CPCA Adult Education Budget webpage - The CPCA will process the information you have provided, after which, this information will be transferred to the relevant course provider who will contact you about the course(s) you have registered your interest in.



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The CPCA may share your personal information with other organisations, where the law allows it or we have a legal obligation to do so. For example, we may share your personal information with:

- A third party under contract with the CPCA for delivery of the AEB, FCFJs and Multiply
- The DfE and ESFA for the purposes of:
 - Administration
 - Provision of career and other guidance
 - Statistical and research purposes, relating to education, training, employment and well-being prevention or detection of crime

Other organisations include:

- Education and Skills Funding Agency (ESFA)
- Department for Education (DfE)

For marketing purposes – The CPCA may look to use your information and/ or image to create good news/ success stories that will be published via The Authority’s official website and/ or social media channels. The Authority will only use your information for marketing purposes with your consent.

Our legal basis for collecting your personal information.

We collect personal information only where we need to and law permits. For our use of your personal data to be lawful, we need to meet conditions in the data protection legislation. For the purpose of this programme, the relevant condition(s) that we are meeting are:

1. Article 6 (1)(e): It is necessary to collect data from users to effectively access the service and to evaluate outcomes of the service. The legal basis is public task, and the legal gateway is Section 87 of the Education and Skills Act 2008.
2. Article 6 (1)(f): It is necessary to collect data from users as the processing is necessary for the organisation’s legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s data that overrides those legitimate interests. And for the processing of special category data:
3. Article 9(2)(g) of the GDPR, and Schedule 1, Part 2 paragraph 8 of the Data Protection Act 2018: to ensure equality of opportunity or treatment. We may request your participation in interviews and surveys as part of the evaluation of the programme. We may request your participation to make checks to ensure that the correct amount of funding is paid to training providers.

How long we will keep your personal data

CPCA will keep your personal data in its original format for a maximum of 3 years, after which point it will be securely destroyed. DfE may keep a pseudonymised version of your personal data to be used for research purposes and such data will be kept for a maximum of 20 years, please refer to the



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DfE Privacy Notice for more information. Data will be securely stored on an electronic file management system that a very limited number of CPCA staff will have access to.

Who we will make your personal data available to

We sometimes need to make personal data available to other organisations. These include contracted partners whom we may employ to process your personal data on our behalf and/or other organisations (with whom we need to share your personal data for specific purposes).

Where we need to share your personal data with others, we ensure that this sharing complies with data protection legislation. For the purposes of this project, CPCA may need to share your personal data with external evaluators who will:

- analyse your personal data on behalf of CPCA to evaluate AEB, Free Courses for Jobs and Multiply provider and participant outcomes, to contribute to improving the provision.
- follow up with you directly to invite you to take part in qualitative interviews or a survey to understand your experience of participating in AEB, Free Courses for Jobs and Multiply. Participation in surveys and/or interviews is voluntary, and you can opt out by requesting this from our 3rd party contractor.

For more information on how the Department for Education will process your data, please refer to the “Privacy Notice for ESFA” from the Department for Education.

Your data protection rights

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 the CPCA holds about you and to check that the CPCA is lawfully processing it.
- **Request correction** of the personal information that the CPCA holds about you. This enables any incomplete or inaccurate information the CPCA holds about you to be corrected.
- **Request erasure** of your personal information. This enables you to ask the CPCA to delete or remove personal information where there is no good reason for the CPCA continuing to process it. You also have the right to ask the CPCA 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 the CPCA is 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.



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

If we are processing your personal information using your consent, you can withdraw your consent at any time and there are no costs to you in exercising your rights in relation to the above.

If you need access to any of your data protection rights regarding any of the above, please do so by following the process as detailed in [ESFA's Privacy Notice](#).

Further information on processing your information

Learner information

Personal information is collected by the CPCA in accordance with the terms and conditions of funding imposed on providers of learning, for example, further education colleges and private training organisations. The ESFA will process your personal information on behalf of the DfE to enable the DfE to carry out its functions, after which, said personal information will be transferred to us.

Learner information collected by the ESFA is known as the Individualised Learner Record (ILR) and the specification and standards for the ILR are published for each academic year (1 August to 31 July) by the [ESFA](#). This specification provides more information about the use of your information.

Learner contact information collected by the CPCA may be used for the purposes of research and surveys to enable the DfE to carry out its functions or, where learning is funded by the European Social Fund (ESF), for the Department for Work and Pensions to carry out its functions. This contact information will only be used for the purposes of other research and surveys with the consent of the learner.

Learner information is also collected and supplied to the Learning Records Service, a part of the ESFA. Your information is used by the ESFA to issue learners with a Unique Learner Number, and to create and maintain your Personal Learning Record. More information about this use of learner information is published by the [Learning Record Service](#).



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Sharing data

In order for the CPCA to carry out its functions:

- The CPCA and training providers share data to ensure accuracy of information held in relation to the funding of learning - a training provider may need to share your information with another training provider in order to verify accuracy of information in relation to a claim for funding from the CPCA
- Your personal information may be shared with another training provider for the purposes of your continued learning

In the event that a further education college or other training provider is unable to continue the delivery of training funded by the CPCA (for example, where a training provider is a limited company that is dissolved) the CPCA will endeavour to make arrangements for the secure transfer of information, including your personal data, from the former training provider to another training provider to support your continued learning. It may also request information from Awarding Organisations to establish what stage your learning has reached according to their records.

Data Security


We have put in place measures to limit access to your Data through our internal data protection policies. In addition, we limit access to your Data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place appropriate security measures to prevent your Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Further details about the security of your Data can be found [here](#).

All our third-party service providers are required to take appropriate security measures to protect your Data in line with our policies. For further information please review the third-party service providers' Privacy Policies which can be found on their websites or by contacting Adult Education at: aebdevolution@cambridgeshirepeterborough-ca.gov.uk. 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.

If you have any questions about how your personal information is being used, please contact the CPCA's Data Protection Officer:

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Complaints

If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer who will investigate the matter. Contact details are provided above.

For CPCA Privacy Policy, please click [here](#).

We hope that we can address any concerns you may have, but if you remain unhappy you can contact the Information Commissioner's Office (ICO). For more information, visit: www.ico.org.uk

Version History

Issue date	21 February 2024
Approved by	Sue Hall and Lorraine Moses-Copeman
Senior owner	Amos Akinwale
Document owner	Amos Akinwale
Version:	01

