

Privacy Notice (How we use your information)

Employment Support Team (EST)

Pre-Apprentice Programme (PAP)

Employment Support Team (EST) sits within the Partnerships service of Kirklees Homes and Neighbourhoods (HN) directorate. One of the programmes EST delivers is the PAP, which is a 26-week study programme targeted at 16 – 18-year old who can either tenants, or household member, also available to the wider population of Kirklees within the same age range. The purpose of sharing data relates to the recruitment and delivery of this programme, to maximise employability and learning opportunities, linked to vacancies within HN, the wider council and our supply chains.

The categories of information that we collect, process, hold and share include:

- Name
- date of birth
- postal and email address
- telephone number
- academic qualifications
- financial details
- national insurance number
- emergency contact details
- in care/care leave)
- Gender
- Ethnicity
- Disability
- special educational needs
- relevant medical information
- criminal data

Why we collect and hold this information

We use this personal data in order to:

- Assess your eligibility and suitability for the PAP programme
- Provide you with the support you need to complete the PAP programme and access to employment or further training opportunities

- Undertaking evaluation of the success of PAP to continually improve the programme offer
- Assess the quality of our service
- Review the programme and ensure quality of access

The lawful basis on which we use this information

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

6(1)(f) Legitimate Interest

The legitimate interests can be your own interests or the interests of third parties. They can include commercial interests, individual interests or broader societal benefits. The legitimate interest in this instance is that it is required to consider whether the PAP is appropriate for candidates and to ensure that the programme can be tailored to individual learning styles, needs and circumstances.

If we collect any Special category data (more sensitive data, such as your ethnicity or health), we will do this under **Article 9(2)(b)** – UK GDPR matters of employment, social security and social protection and part 1 of Schedule 1 to the DPA 2018:

Para 2 Health or Social Care Purposes

- (1) This condition is met if the processing is necessary for health or social care purposes.
- (2) In this paragraph "health or social care purposes" means the purposes of -
 - (b) the assessment of the working capacity of an employee

Article 10

The DPA 2018 will provide a lawful basis to process criminal offence data

Safeguarding of children and of individuals at risk

18(1) This condition is met if—

(b) the individual is—

(i) aged under 18, or

(ii) aged 18 or over and at risk,

(d) the processing is necessary for reasons of substantial public interest.

The key areas of legislation that direct us to collect and use your information, include but are not limited to the following legislation:

- Section 17, Children Act, 1989 and 2004
- Every Child Matters, 2003
- Education Act 2015
- Equality Act 2005 and 2010

How we store your personal information

Your information is safely stored on Kirklees Council's secure network drives and Microsoft Teams.

If you are successful in the programme, we will keep all personal and characteristic data for up to 3 years. We will then dispose your information by deleting all digital records and safely disposing of any written documents via Kirklees confidential waste. If unsuccessful, we will only retain your data if we feel there is another more suitable programme. In this case, we will contact you directly and ask for your consent.

Who we may share your information with

We may sometimes share the information we have collected about you where it is necessary, lawful and fair to do so. In each case we will only share the minimum amount of information, only when required, for the following reasons:

- To safeguard vulnerable children and young people;
- To support the recruitment and suitability onto the programme
- To update on progress
- To assess individual learners needs and requirements for the course
- To monitor and manage attendance
- To identify and encourage good behaviours.
- To undertake risk assessments
- To identify suitable and appropriate placements
- To ensure any identified support is in place
- To provide an offer of education, employment and training support
- To provide details of other suitable training, employment opportunities
- To devise tailored individual support

We may share this information with:

- Other services within Kirklees Council;
- National government department e.g. Department for Education; Kirklees College
- Other partners such as health and the police.
- Other recruitment and employment partners e.g. Calderdale and Kirklees Careers, Groundwork
- With potential employers related to any of the work experiences sections of the programme

We do not share personal information about you with anyone else without consent unless the law and our policies allow us to do so.

Your data protection rights

Under data protection law, you have a number of rights, including the right to have your records rectified and the right to ask for access to all the information the Council holds about you. These rights are listed in more detail on [Kirklees Council's data protection rights page](#).

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.

Please contact us at Data.protection@kirklees.gov.uk if you wish to make a request.

Further information

If you would like further information about how we manage your data, please see the [Kirklees Council privacy notice](#).

If you would like further information about this privacy notice, please contact: EST@kirklees.gov.uk

If you have any worries or questions about how your personal data is handled, please contact the Data Protection Officer at DPO@kirklees.gov.uk or by ringing 01484 221000.

You can also complain to the ICO if you are unhappy with how we have used your data. You can contact the ICO via the ['Contact us' page on their website](#), or by ringing 0303 123 1113.