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**New Horizons Privacy Notice**

**Introduction to New Horizons and your personal data**

The New Horizons project offers 121 coaching on money, getting online and getting back to work and is delivered in partnership between:

* Longhurst Group (formally Axiom Academy)
* Broadland Housing Group
* Centre 33
* CHS Group
* Cross Keys Homes
* Norfolk CAB
* Cambridge Centre for Housing and Planning Research (part of the University of Cambridge)

This notice will tell you more about the personal information (or personal data) that we collect on the New Horizons project, how we store it and who can see it. Broadly, personal information is any information that can identify you as an individual. We use (or ‘process’) many different types of personal information, for example your name, address and date of birth. We use this information so that we can treat you fairly and according to your needs, and also so that we can contact you about the services being provided to you.

We may also process 'special categories' of personal information (for example, information relating to your health, religion or ethnicity) so that we can ensure we are providing equal access to the project. If you do provide us data that constitutes a special category of personal information, then you will be regarded as giving your explicit consent to us processing that data as described in this privacy notice. We will always seek to confirm with you that this is the case.

If you have any questions about how we process your data, you can contact our Project Manager at new.horizons@chsgroup.org.uk – further contact details are given below.

**Who is responsible for your data?**

The information you provide on the New Horizons project is shared with the other partners on the project and will be shared with the Department for Work & Pensions (DWP) and used to evaluate this project and to report to the National Lottery 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 & 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.**

Each partner organisation is committed to protecting your data and will manage it in line with this privacy notice. If they use the data collected from you during your time with New Horizons for any purpose other than the project, such as by storing it on their own internal database, they will have a separate Privacy Notice that they will show you.

**The lawful basis for the 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 (ESF). ESF grant beneficiary organisations are data processors only in respect to information processed which relates to participants in the operations and projects funded by the ESF. The New Horizons Project is funded within the ESF programme.

DWP is **not** the controller for any other data collected by the New Horizons project that is not essential for delivering the ESF programme, or for any personal data that would normally be collected anyway by the organisation you are working with.

The ESF Programme Action Note 018/18 (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/704535/018-18\_General\_Data\_Protection\_Regulation\_\_GDPR\_\_and\_ESF.pdf ) sets out the lawful basis for processing personal data under ESF:

* Personal data - ‘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’.
* Special categories of personal data - “processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject”.

**Who can see your data within our partnership and how do we store it?**

Hard copies of the data held by the project is stored securely by the organisation you are working with. After you exit the project it is sent for secure storage to CHS Group.

Your data is also held on a secure Management Information System and is uploaded to our funder, the National Lottery, via a secure on-line platform and in turn submitted to the DWP by the National Lottery via a secure on-line platform.

**How do we protect your data?**

We take data security very seriously. All partner organisations on the New Horizons project have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Your data is held securely in electronic and/or manual records. All of our staff receive data protection training and are made aware of how data should be handled and stored in accordance with data protection legislation. Where appropriate, IT systems have restricted access arrangements in place to ensure that only authorised staff have access to your data.

**How long do we keep your data?**

If you do not enrol on the New Horizons project, we will keep your data until the end of the project.

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: https://assets.publishing.service.gov.uk/government/uploads/sy stem/uploads/attachment\_data/file/591617/ESF\_Guidance\_on\_ document\_retention.pdf

**What are your rights?**

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-forwork-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-informationfrom-the-department-for-work-and-pensions

Even if we already hold your personal data, you still have various rights under data protection legislation. We will seek to deal with your request without undue delay and in accordance with any legislative requirements. We may keep a record of your communication to help us resolve any issues or requests that you raise.

* Right to object – if we are using data because we deem it necessary for our legitimate reasons to do so and you do not agree, you have the right to object. You also have the right to object to being subject to automated decision making, including profiling and direct marketing.
* Right to withdraw consent – where we have obtained your consent to process personal data for certain activities (including marketing), you may withdraw your consent and request that your personal data be deleted at any time.
* Right to access (subject access request) – you have the right to ask us to confirm what information we hold about you at any time and may ask us to modify or update such information. We may ask you to verify your identity, provide more information and/or where legally permitted decline your request and explain why.
* Right to erasure – in the following circumstances, you have the right to request that your personal data be erased: if the data is no longer necessary for the original purposes it was collected or processed, it has been processed unlawfully, it should be deleted due to a legal obligation or you object to processing and there is no overriding legitimate interest for us to continue processing. We may only decline your request if certain limited conditions apply.
* Right to portability – you have the right to ask us to transfer your data to another data controller or to yourself.
* Right to block or restrict processing whilst the organisation considers your requests exercised under data protection legislation.

If you would like to exercise any of these rights, please contact:

New Horizons Project Manager

new.horizons@chsgroup.org.uk

0300 1113555

Endurance House

Chivers Way

Histon

CB24 9ZR

If you are unhappy with the way in which your personal data has been processed you may in the first instance contact our Data Protection Officer at data.protection@chsgroup.org.uk or by phone or in writing using the details above.

If you remain dissatisfied then you have the right to complain directly to the Information Commissioner ([www.ico.org.uk/concerns](http://www.ico.org.uk/concerns))

**What if you do not wish to provide personal data?**

You will not be able to enrol on the New Horizons project if you cannot provide us with your personal data.

**More about exercising your personal data rights relating to the project**

If you want to see the data held about you on the project, in the first instance you should contact your coach on the New Horizons project, who will respond as soon as they are able to; this must be within 40 days.

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