**Privacy Notice**

The Higher Education Funding Council for Wales (HEFCW) is the Lead Beneficiary for the GO Wales: Achieve through Work Experience Programme. As the Programme is ESF funded, HEFCW must collect certain information relating to participants in the Programme, as required by the Welsh European Funding Office (WEFO) / Welsh Government in line with the Structural Fund regulations (Regulation (EU) 1303 / 2013 and Regulation (EU) 1304 / 2013). The Welsh Government is the Data Controller for this information. In addition, HEFCW collects additional data in order to manage and deliver the Programme; HEFCW is the Data Controller for the additional information. The universities who deliver the Programme are Data Processors.

**What information we process**

The types of information processed relating to employers include personal details and contact details. Full details of the data collected and the reason for collecting it can be found at **Annex A**.

**Lawful basis**

The lawful basis for processing the information collected is to enable Welsh Government and HEFCW to perform a task carried out in the exercise of official authority vested in them, in accordance with the Structural Funds Regulations and the Funding Agreements between WEFO and HEFCW.

**What we do with the information and how long we retain it**

The information you provide during the registration and your engagement with the programme is used to create and maintain project records for administration and audit purposes, to manage and monitor the programme and to claim financial support. In addition, your information will be shared with organisations contracted by HEFCW to undertake evaluations or research studies on the Programme. The contractors may wish to contact you to discuss your experiences on the Programme. The output from the evaluation will be a written report submitted to WEFO and shared with universities and more widely which will not contain any contact details and from which all identifying information will be removed. The report will be published on the Welsh Government and HEFCW websites.

Programme performance data will be shared with all delivery partners (universities in Wales) and other stakeholders. These data will be aggregated and will be in the form of statistics.

WEFO will share data with relevant Welsh Government teams and European Commission (EC) auditors to help determine whether the project has followed the correct procedures and to verify the eligibility of participants, activity and expenditure. Welsh Government may also share data with independent auditors.

For more information on how the Welsh Government / WEFO uses the information reported to them, please view [180622-wefo-gdpr-v2-en.pdf (gov.wales)](https://www.gov.wales/docs/wefo/publications/180622-wefo-gdpr-v2-en.pdf).

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Your information will not be used for any other purpose than those specified above. The data retention period is determined by WEFO in line with the obligations in the Structural Funds Regulation (EU) 1303 / 2013.

**Your rights**

You have the right to request a copy of your personal information and to request that we correct your information if it is inaccurate by emailing HEFCW on [atwe@hefcw.ac.uk](mailto:atwe@hefcw.ac.uk).

You also have the right to object to the processing of your personal data. However, you must give specific reasons why you object to the processing of your data, and we / Welsh Government / WEFO can continue processing if Welsh Government / WEFO can demonstrate compelling legitimate grounds for the processing.

If you wish to view the data held by the Welsh Government you should contact the Welsh Government Data Protection Officer on [Data.ProtectionOfficer@gov.wales](mailto:Data.ProtectionOfficer@gov.wales).

**Annex A**

**GO Wales: Achieve through Work Experience**

**Data collected**

Employers

| **Data** | **Reason for collecting data** | **How data are processed** |
| --- | --- | --- |
| **CRM system:**  Employer Name  Address  Postcode  Unitary authority  No of employees (not mandatory)  Description of employer activity  Locations where employer could host work experience  Type of work experience they could offer  Employer contact details  Title  Name  Contact number  Email address  Notes  Regulation (EU) 1303 / 2013 (Article 140) - required to evidence activity on programme and to deliver programme in line with Business Plan. | To source work experience and manage employer contact  Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan when employer has completed registration form. Before that point, employer must give consent. | Data accessed to manage employer contact across programme.  To monitor number of employers on CRM who are interested in hosting work experience on programme.  Retained in line with document retention guidance. |
| **GOW system**  Highest occupational risk  Organisational risk  Combined risk | Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. Management of programme | To check that H&S vet has been undertaken  Retained in line with document retention guidance. |
| **Employer Registration Form**  Registered name  Trading name  Address  Town / City  Unitary Authority  Postcode  Website address  Title  First name(s)  Surname  Job title  Contact number *(including area code)*  Email address  Whether organisation is Private sector / Public sector / Third sector  Is the organisation a social enterprise  Employee headcount  How the organisation is funded (i.e. receives more than 50% of its funding from the public purse / less than 50% of its funding from the public purse)  Business sector (ONS / Companies House categories)  How organisation found out about GOW | Required to evidence activity on programme and to deliver and evaluate programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.  Management and monitoring of programme | To monitor, manage and deliver programme.  Could be provided to HEFCW / WEFO / auditors as evidence of activity.  Evaluation.  Retained in line with document retention guidance. |
| **Employer Registration Form**  If organisation would like updates on programme | To keep employer updated on news on programme. | If employer has consented, could be used to send news on programme |
| **Work Experience Details Form**  Description of organisation  Type of work experience opportunity offered to student (shadowing / taster / placement)  Expected duration of work experience  Number of hours per day / number of days / attendance pattern  Preferred start date  Activities student will be undertaking  Where work experience will be located (office, factory etc)  Whether location is easily accessible by public transport  Employer will provide necessary resources for student to undertake work experience  Name and contact details of student’s supervisor(s)  Anticipated level / frequency of supervision | Required to evidence activity on programme and to deliver and evaluate programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.  Management and monitoring of programme, including monitoring quality of opportunities. | Could be provided to HEFCW / WEFO / auditors as evidence of activity.  To monitor, manage and deliver programme.  Evaluation.  Retained in line with document retention guidance. |
| **De Minimis Aid Application**  Confirmation if organisation is in one of sectors:  Fishery and aquaculture sectors  Primary production and/or agricultural products  Processing and marketing of agricultural products where the amount of aid is fixed upon the basis of the price or quantity of products purchased or put on the market  Confirmation if organisation is eligible for De Minimis Aid (i.e. if it’s legally separate, or part of a linked enterprise, or part of a merger or acquisition)  Amount of De Minimis Aid received in previous 3 fiscal years, body providing aid and month / year aid was awarded | To check and evidence eligibility of employer to receive a grant (subsidy) in relation to paid placement as specified by Commission Regulation (EC) No 1407/2013 of 18 December 2013 on the application of Articles 107 and 108 of the Treaty to de minimis aid, applicable until 31 December 2020 (De Minimis Aid Regulation) | To determine if employers are eligible to receive grant under De Minimis Regulation.  To monitor De Minimis Aid.  Information and evidence retained for 10 years in line with De Minimis Aid Regulation.  Provided to HEFCW as evidence of compliance with De Minimis Aid Regulation.  Could be provided to HEFCW / WEFO / auditors as evidence of compliance with De Minimis Aid Regulation.  Retained in line with document retention guidance. |
| **Employer Feedback**  Feedback on programme  Feedback on student | Required to evidence activity on programme and to deliver and evaluate programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.  To help student learn from and reflect on work experience. | Could be provided to HEFCW / WEFO / auditors to evidence activity.  Monitor, manage and deliver programme.  Evaluation.  Retained in line with document retention guidance. |
| **Paid Placement:**  Participant’s payslips from employer  Bank statements from employer  Match Funding Declaration | Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.  Evidence of actual costs paid to participant | Could be provided to HEFCW as evidence of activity / financial claim.  Could be provided to HEFCW / WEFO / auditors as evidence of activity / financial claim.  Retained in line with document retention guidance. |
| **Paid Placement:**  Match Funding Declaration | Confirmation of match funding and subsidy in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Monitoring activity  Monitoring expenditure and match funding  Part of financial claim to draw down costs from WEFO  Retained in line with document retention guidance. |