**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 include personal details, education details and special categories of data such as ethnic origin, disability, work limiting health condition and migrant status. 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.

Special categories of data are processed under the condition that processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. ESF regulation requires the Managing Authority (e.g. WEFO) to collect such data and to also use this data to help ensure equitable participation from all areas of society in line with the Equality Act 2010. This data is also required to demonstrate eligibility for the AtWE programme.

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

The information you provide during the employability assessment process, 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.

In order to assess the impact of EU Funding in Wales more broadly, WEFO or a commissioned research organisation will undertake research or evaluation studies of participants. WEFO or an appointed contractor will follow appropriate ethical guidance, and the findings of research and evaluation studies will not identify individual participants or organisations.

Welsh Government / WEFO may link participant records from the data to other information about them held by the Welsh Government and UK Government departments. This will be done only for the purposes of evaluating the impact EU funds support has had on the people who took part and research on related topics undertaken by the Welsh Government / WEFO or approved social research organisations.

WEFO will also 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).

Your personal 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 personal information if it is inaccurate by emailing HEFCW on 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.

**Annex A**

**GO Wales: Achieve through Work Experience**

**Data collected**

Participants (students)

| **Data** | **Reason for collecting** | **How HEFCW processes data**  |
| --- | --- | --- |
| Age / Date of birth | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Confirm eligibility.Could be provided to HEFCW / WEFO / auditors to evidence activity / eligibility.Retained in line with document retention guidance. |
| Gender | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Monitor outputs against targets agreed with WEFO.Could be provided to HEFCW / WEFO / auditors to evidence activity.Retained in line with document retention guidance. |
| Migrant status | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Monitor outputs against targets agreed with WEFO.Could be provided to HEFCW / WEFO / auditors to evidence activity.Retained in line with document retention guidance. |
| Jobless household | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU.  | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Dependent children | Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Homeless | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Disabled | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Monitor outputs against targets agreed with WEFO.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Type of disability | Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.Required by HEFCW to monitor participants on programme and to help Joint Beneficiaries deliver programme. | Monitor delivery.Evaluation.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Employment status (i.e. full-time education) | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Confirm eligibility.Documentation showing full-time education could be provided to HEFCW / WEFO / auditors to evidence activity / eligibility.Evaluation.Could be provided to HEFCW / WEFO / auditors to evidence activity.Retained in line with document retention guidance. |
| Highest qualification  | Regulation (EU) No 1304 / 2013, Annex 1 – WEFO is required to report this to EU. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Evaluation.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Name, including title | Required by WEFO to be able to contact participants, for audit trails and to check participants are duplicate (reported more than one to EU). Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Deliver programme.Evaluation.Could be provided to HEFCW / WEFO / auditors to evidence activity.Retained in line with document retention guidance. |
| Address | Required by WEFO to be able to contact participants, for audit trails and to check participants are duplicate (reported more than one to EU). Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. Determines eligibility. | Reported to WEFO in order to draw down grant.Confirm eligibility.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Contact Details | Required by WEFO to be able to contact participants, for audit trails and to check participants are duplicate (reported more than one to EU). Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Used to contact participants.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Ethnicity  | Required by WEFO to monitor performance against CCT targets. Eligibility criterion as agreed with WEFO, therefore determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Confirm eligibility.Monitor outputs against targets agreed with WEFO.Evaluation.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Care or childcare responsibilities | Required by WEFO to monitor performance against CCT targets. Eligibility criterion as agreed with WEFO, therefore determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Confirm eligibility.Monitor outputs against targets agreed with WEFO.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Welsh language ability  | Required by WEFO to ensure they can demonstrate the programme is being delivered in line with the Welsh Language (Wales) Measure 2011. | Reported to WEFO in order to draw down grant.Monitor programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Preferred language for communication | Required by WEFO to be able to contact participants in language of their choice and to ensure programme is delivered in line with the Welsh Language (Wales) Measure 2011. | Reported to WEFO in order to draw down grant.Determine language of contact.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Right to live in UK | Eligibility criterion for ESF support, therefore determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Confirm eligibility. Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Right to work in EU | Eligibility criterion for ESF supportRequired to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.  | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| NI number | Required by WEFO to be able to contact participants, for audit trails and to check participants are duplicate (reported more than one to EU) and to enable them to track participants. Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| ULN | Required by WEFO to enable them to track participants.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Could be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Home address | Required by HEFCW to check if participant is from a low participation neighbourhood and to monitor where participants are domiciled.Determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Reported to WEFO in order to draw down grant.Evidence eligibility.Monitor outputs against targets agreed with WEFO.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| If home address is Low Participation Neighbourhood | Required by HEFCW to check if participant is from a low participation neighbourhood and to monitor where participants are domiciled.Eligibility criterion as agreed with WEFO, therefore determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence eligibility.Monitor outputs against targets agreed with WEFO.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Care leaver | Eligibility criterion as agreed with WEFO, therefore determines eligibility.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence eligibility.Monitor outputs against targets agreed with WEFO.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Graduation date | Required by HEFCW to monitor participants on programme and to help Joint Beneficiaries deliver programme.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Monitor outputs.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Place of study | Required by HEFCW to monitor participants on programme and to help Joint Beneficiaries deliver programme.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan.Determines eligibility. | Monitor outputs.Confirm eligibility.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Course / degree subject | Required by HEFCW to monitor participants on programme and to help Joint Beneficiaries deliver programme.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Used by HEFCW / Joint Beneficiaries to monitor participants and to identify gaps in provision.Deliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Employability at start of programme and throughout | Suitability assessment required by WEFO. Benchmark of skills to evidence progression (activity).Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence suitability of participantsEvidence progression of participantsEvidence activityMonitor and deliver programmeDeliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Objectives / Reflection for opportunities | Activity agreed with WEFO. Evidence of participants learning.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence activityMonitor and deliver programmeDeliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Record of general engagement with participant, including work experience preferences | Activity agreed with WEFO. Evidence of participants learning.Evidence of advisers’ input.Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence activityMonitor and deliver programmeDeliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Feedback on opportunities and programme | For evaluation purposes for Joint Beneficiaries and evaluators appointed by HEFCWRequired to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence activityAnonymised data shared with Joint BeneficiariesDeliver programme.EvaluationCould be provided to HEFCW / WEFO / auditors to evidence activity. Retained in line with document retention guidance. |
| Copies of validation documentation (e.g. passport, birth certificate, Student Loan information etc) | To evidence eligibility in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Could be provided to HEFCW / WEFO / auditors to evidence activity / eligibility.Retained in line with document retention guidance. |
| Work Experience Journals | Required to evidence activity on programme and to deliver programme in line with Regulation (EU) 1303 / 2013 (Article 140) and Business Plan. | Evidence activityMonitor activity on programme, including number of hours on work experience and level of activity Could be provided to HEFCW / WEFO / auditors to evidence activityRetained in line with document retention guidance. |
| Anonymised case studies, with details of student’s experience on programme, as part of Progress Report | To evidence activity to HEFCW and WEFO and to meet requirements of WEFO’s Progress Reports. | Information forwarded within HEFCW for information and to inform monitoring against performance of Well-Being of Future Generations Act.Information included in WEFO Progress Report as evidence of activity and impact.Retained in line with document retention guidance. |
| Case studies with participant’s and employer’s names | To promote programme to students, employers and other stakeholders. | These are developed with consent of participant and employerParticipant and employer have final approval of the textCase Studies will be put on GOW website |