



Participant Privacy Notice

Version	3.3
Adopted	June 2021
Review	March 2027

Who is this privacy notice from?

Humber Learning Consortium (HLC) is responsible for managing a network of partner organisations who deliver a range of Department for Work and Pensions (DWP), The National Lottery Community Fund, Department for Education (DfE) and the Hull & East Yorkshire Combined Authority (HEYCA) contracts in Hull and East Riding of Yorkshire.

HLC is obliged to collect Personal and Special Category data under its funding and contractual agreements to:

- ✓ Ensure public money is being spent in line with legal and statutory obligations.
- ✓ Check your eligibility to participate in the programme.
- ✓ Support our partners in delivering service(s) to you.
- ✓ Understand your progress.
- ✓ Contact you during or after your programme for research purposes.
- ✓ Monitor the overall progress of the programme.
- ✓ Refer you onto other educational, employment or well-being routes.

HLC also uses your data to compile statistics and to help evaluate the effectiveness of our Programmes and Partner Organisations.

[This notice should be read in conjunction with Funders Privacy Notices \(details on enrolment forms\).](#)

We take the privacy of our participants seriously. This notice explains how we collect, use, and protect personal data in line with the **UK GDPR, Data Protection Act 2018**, and the **Data (Use and Access) Act 2025 (DUAA)**.

Personal Data We Collect

We may collect:

- Name, contact details, date of birth, address including postcode, email address, telephone number
- Personal and Special categories data including date of birth, gender, sex, if considered to have a disability or limiting disability, ethnicity, if they have children.
- Benefits received, tenure/living arrangements, Qualifications and prior attainment.
- Participation records, attendance, and feedback
- Safeguarding and PREVENT-related information
- Limited special category data where necessary for physical and mental health, support, self-confidence
- Work experience including training, volunteering, education, barriers to work and job searching
- Destination data including job outcomes, employer details, contracted hours/days, education, College/University/Further Education Provider
- Learner Voice surveys

We collect only the **minimum personal data necessary** to provide our services and support participants.

For DfE funded provision we will also collect prior attainment data from the Learning Records Service (LRS) as part of eligibility checks. DfE's privacy notice can be found here:

<https://www.gov.uk/government/publications/lrs-privacy-notice/lrs-privacy-notice>

Safeguarding

We are committed to protecting the safety and wellbeing of children and vulnerable individuals. We may share personal information where necessary to safeguard someone at risk. This may include sharing information without consent where there is a clear need to protect an individual from harm.

We work with relevant safeguarding partners, such as local authorities, and ensure information is shared lawfully, securely, and only when necessary. All safeguarding information is treated as highly sensitive, stored securely, and accessed only by authorised staff.

How We Collect Your Data

Your training provider will provide HLC with relevant funding information, electronically through Microsoft Office 365. Once approved, your data will be stored on HLC Learner Management Systems in the UK. If your application for enrolment is not approved, HLC will not keep your information for longer than necessary. Any paper copies of your data are transferred to HLC through postal service using recorded delivery.

Further information about electronic transfers of your data can be found here <https://www.hlc-vol.org/about-us/gdpr/>

How We Use Your Data

Purpose	Legal Basis
Delivering activities, events, or services	Contractual / legitimate interest
Safeguarding and protecting vulnerable participants	Recognised Legitimate Interests
Improving services, risk assessment, and operational efficiency	Planned use of AI / automated tools (minimal personal data only)
Communication about services or activities	Legitimate interest (“soft opt-in” for charities)
Legal or statutory obligations	Legal compliance

Future AI use: We may use AI or automated tools in the future for operational efficiency and service improvement. This will not make decisions with significant legal effects on participants and will use only minimal data, with appropriate safeguards.

Sharing Your Data

We may share personal data with:

- Safeguarding partners or statutory authorities, where necessary
- Contractors or partners supporting service delivery
- Regulators or funders, where required by law
- Third-party services such as evaluation officers, researchers, software suppliers, auditors, cloud hosting services
- All third parties must comply with data protection principles, a list can be found on <https://www.hlc-vol.org/about-us/gdpr/>

Marketing and Fundraising

As a charity, we may contact you about our activities. Communications are relevant and reasonable, and participants can opt out at any time by contacting us directly.

Your Rights

Participants have the right to:

- access, correct, or delete their personal data
- restrict or object to processing
- withdraw consent where relevant
- raise a **data protection complaint** with us or the **ICO**

How to Make a Complaint

If you believe your personal data has been mishandled, you may submit a complaint via our secure online form:

<https://www.hlc-vol.org/about-us/gdpr/>

Complaints are **acknowledged within 30 calendar days**, investigated by our **Data Protection Officer (DPO)** or authorised staff, and outcomes are communicated in writing.

Data Retention

We keep personal data only as long as necessary for the purposes outlined above and in accordance with **legal obligations**.

Contact

For any questions about your personal data or this notice, please contact:

Emma Wright, Data Protection Officer (DPO)

Email: privacy@hlc-vol.org

Telephone: 01482 327438