

PRIVACY NOTICE

1) Introduction

Genesis Training Group takes the security of your personal data very seriously. This privacy statement sets out why we need your information, what we need and how we will use it.

2) Why do we need data about you?

Genesis Training Group, and our subcontractors, need to collect, and use information about you (data) to deliver our range of services including employability support and skills training.

Genesis Training Group works as a data processor for several public bodies including the Department for Work and Pensions (DWP), The Education and Skills Funding Agency (ESFA), and devolved administrations in the Northwest of England.

As the "Data Controller" these bodies are able to lawfully process data in line with the following lawful basis and Genesis Training Group as a "Data Processor" for these bodies, can lawfully process your data on the same basis under the contracts we have with these bodies.

3) Lawful Basis for Processing

We acknowledge and agree that any personal information concerning you that we handle will be processed in accordance with all applicable data protection laws in force from time to time, including the Data Protection Act 2018 applies which implemented the EU General Data Protection Regulations (GDPR), which following the end of the Brexit transition period became known as the UK GDPR.

We can gather, use and share (process) your data as a "public task in the public interest" under relevant laws, including the General Data Protection Regulation (article 6(1)(e)). We can process your sensitive personal (special category) data by ensuring that this processing is proportionate and is necessary for statistical research purposes under the General Data Protection Regulation (article 9 Sections (2)(g) and (j)).

For the purposes of the General Data Protection Regulation, our subcontractors we use to support delivery of the contracts we have with the various "Data Controllers" are also able to process this information in line with the contractual requirements we have with them.

For Sales and Marketing purposes we may contact you on the basis set out under GDPR Article 6 (f) that processing is necessary for the purpose of the legitimate interest we are pursuing to inform you of the products and services we offer. In all cases where we use this lawful basis you will have the right to immediately unsubscribe from further contact if you are not interested in the product or service offered.

4) The Data Controller

Most of the data processing carried out by Genesis Training Group is under contracts held with public bodies and we process your data as a “Data Processor” in line with the lawful basis outlined above. In a minority of cases the lawful basis of processing may be contractual, by consent or by another lawful basis. In these circumstances we will confirm the specific legal basis to you via additional documentation. Where Genesis Training Group requests additional personal data from you, beyond the data required to act as a Data Processor, or in circumstances where Genesis Training Group are the Data Controller, we will also specifically ask for your consent to process your data. In any circumstances where the lawful basis of processing is your consent you will be able to withdraw your consent at any time.

If you provide us with any personal information or believe we hold such information, you can exercise any of your rights under GDPR by contacting:

The Designated Data Protection Person
Genesis Training Group,
Beacon Building,
College Street,
St Helens,
WA10 1TF
Tel: 01744 733 711
Email: peter.fitzhenry@genesis-jobs.co.uk

5) How we use your information

Genesis Training Group and our subcontractors will use your data to:

- Help us agree with you the appropriate type of service we can provide to support you in your training and/or employment.
- Monitor and report on our performance in supporting you, including producing statistics and equalities monitoring reports.

- Enable subcontractors to claim payment from Genesis Training Group as per contract.
- Better understand how our services work, what difference they make to the people involved and how to improve future services for learners.

6) What information we collect

To deliver, monitor and evaluate our services, we will ask you for:

- Your contact details
- Other personal data (for example, your age, gender, National Insurance Number)
- sensitive / personal data (for example, about your health, religion, ethnicity).

We will also ask you about your relevant background / historical information that supports the service we offer to you and will hold information on the support you receive as a learner in the programmes we offer.

7) How we store your data

Your data will not be transferred to, stored at, or processed in a destination outside the United Kingdom. We will store your information on databases held in locations that have been tested for electronic and physical security and access will be permitted only to those with a need to know. We will not store your personal information for longer than is necessary to deliver and evaluate the services we offer.

8) Data Security

There are appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

9) Sharing your Data

To deliver our services, Genesis Training Group and our subcontractors may need to share the minimum necessary of your personal and sensitive details with:

- potential employers
- specialist training and other organisations necessary for your full participation in the services we offer, where these organisations are covered by a contract held with Genesis Training Group and therefore incorporated into our contract(s) held with the data controller
- third party contractors acting on behalf of Genesis Training Group to provide support services necessary for the delivery of our service to you
- other parties, as is necessary for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings).

To evaluate our services, we may also contact you to invite you to take part in the evaluation of our services. The feedback you give will help to continually improve our offer. The information collected will be used for research, evaluation, and statistical purposes only.

You do not have to take part in evaluation activities if you do not want to.

We will not share your contact information for any marketing purposes.

10) Your Responsibilities

We would like to remind you that it is your responsibility to ensure the security of your own data (always including printed material such as CVs), including when on Genesis Training Group premises, Genesis Training Group delivery locations or subcontractor's premises. Genesis Training Group cannot accept responsibility for the loss or theft of your personal data if caused by your own negligence.

11) Your Rights

- You have the right to access the personal data we process about you. To access the personal data we process about you, you must submit a request in writing (by post or email) to the Genesis Training Group Data Protection Officer (see details in part 4 above). Genesis Training Group will treat this as a Subject Access Request and will respond within one month of receipt of the request. Genesis Training Group, as the "Data Processor", will need to contact the relevant public body to obtain their authority as "Data Controller" to release your data but we will provide the "Data Controller" Privacy Notice for our customers and learners with all the assistance they require to meet your demands for access to your personal data on a timely basis.

- You have the right to object to processing that is or is likely to cause substantial damage or distress to you or another. To exercise this right, please write stating what processing you object to and why it is causing or is likely to cause you damage or distress. Genesis Training Group will consider the request and respond within 21 days to confirm whether the objection is accepted. Genesis Training Group, as the “Data Processor”, will need to contact the relevant public body to obtain their authority as “Data Controller” to respond to your request but we will provide them with all the assistance they require to respond to your request on a timely basis.
- We seek to ensure that personal data processed is accurate and up to date. You have the right to request to rectify, block, erase or destroy inaccurate information. To exercise this right, you can write to Genesis Training Group setting out the information and the reasons you wish it to be changed etc. We will consider the request and respond within 21 days to confirm whether the request is accepted. In cases where the inaccurate data is the result of processing by Genesis Training Group, we will respond to you directly without reference to the public bodies who are our “Data Controllers”. However, in some cases the inaccurate data may relate to information we have received about you from the various public bodies we process data for. In these cases, we will need to confirm details with the public body, but we will work with them to provide you with an appropriate resolution on a timely basis.
- You have the right to be confident that we will handle your personal information responsibly and in line with good practice. If you have a concern about the way, we are handling your information you can write using the details as stated in part 4 of this notice.

12) Concerns and Complaints

Please note that Genesis Training Group have a Complaints procedure and if you need to complain about the way any request you have made in relation to your personal data has been handled, you can use our Complaints procedure to help resolve this issue in the first instance. Please ask for a copy of our complaint's procedure.

If you feel that we have been unable, or unwilling, to resolve your information rights concern, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

The ICO are the supervisory authority responsible for data protection in the UK. For further information, including independent data protection advice and information in relation to your rights, you can contact the Information Commissioner at:

Postal Address:
The Information Commissioner,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Telephone: 08456 30 60 60

Website: <https://ico.org.uk/> You can also report a concern here - <https://ico.org.uk/make-a-complaint/>

13) Changes to the Privacy Notice

This Privacy Notice may be changed by Genesis Training Group at any time. This Privacy Notice will be updated to comply with any changes to UK GDPR or subsequent legislation.


Version Control

| Version History | Content Changed |
|-------------------|-----------------|
| 1 - February 2022 | Policy produced |

Review and Ratification

| Next Review Date | Reason for Review |
|------------------|--|
| February 2023 | Legislation updates and process change |

Dated: 23rd February 2022

Signed: 

Name: Joseph Lennard

Position: Operations Director

Annex A Website and social media specific information

1) The Website

Genesis Training Group takes user privacy seriously and we have therefore taken the necessary steps to protect your privacy whilst you are accessing this website. The website (www.genesis-jobs.co.uk) complies with all UK national laws and requirements for user privacy. The website is hosted by PICSWeb from Pellcomp. The website and all data are located in the UK.

2) The use of cookies

This website uses cookies to help us deliver a better user experience. Personal information about you is not collected during the tracking process. See our cookies policy for full details.

3) The information we collect via our website

The information about you we may collect, hold and process is as follows:

1. If you are applying for a course to attend a jobs fair:
 - Your name
 - Your email address
 - Your telephone number
 - Your address
 - Sensitive information that may be requested

2. General Contact:
 - Your name
 - Your email address

4) How we use your personal information

The personal information you provide under the scenarios above will be used to allocate you a space on the course/jobs fair or reply to your general query.

5) External Links

Although this website only looks to include quality, safe and relevant external links, users are advised adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text / banner / image links to other websites, similar to; www.websitename.co.uk.)

Genesis Training Group cannot guarantee or verify the contents of any externally linked website despite our best efforts. Users should therefore note they click on external links at their own risk and Genesis Training Group cannot be held liable for any damages or implications caused by visiting any external sites linked.

6) Social Media Platforms

Communication, engagement and actions taken through external social media platforms that Genesis Training Group participate on are subject to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution regarding their own privacy and personal details.

Genesis Training Group will never ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as via telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

7) Shortened links in social media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs [website addresses], for example: <http://bit.ly/xxxxxx>.

Users are advised to apply caution and good judgement before clicking any shortened URLs published on social media platforms by Genesis Training Group. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking and therefore Genesis Training cannot be held liable for any damages or implications caused by visiting any shortened links.