

Greater Manchester Colleges Group

Privacy Notice – Greater Manchester Further Education Innovation Programme (GMFEIP)

Greater Manchester Colleges Group collects, stores and processes personal information about those people who engage with us in connection with the GMFEIP – including but not limited to engagement with our Innovation Connector Network, our GM Colleges CPD Programme and/or our Innovation Literacy programme. This Privacy Notice explains:

- What information we collect from and about individuals in connection with our GMFEIP activities;
- How we use (and may disclose to others) information from and about individuals in connection with our GMFEIP activities;
- How we determine for how long we retain such information; and
- What those individuals' related data protection law rights are.

1. Who is the Controller of your personal information relating to the GMFEIP?

- 1.1 The controller of your personal data in connection with the GMFEIP is Oldham College. Oldham College is one of the nine member colleges of the Greater Manchester Colleges Group (a full list can be accessed here: <https://gmcg.ac.uk/our-colleges/>) and is the lead college within the Greater Manchester Colleges Group for the purposes of the GMFEIP project.
- 1.2 Oldham College's address for correspondence is Oldham College, Rochdale Road, Oldham, Lancashire, OL9 6AA.
- 1.3 Oldham College is committed to ensuring that all personal information it holds is treated properly and in accordance with applicable data protection legislation. Oldham College is registered as a data controller with the Information Commissioner's Office and our registration number is Z6797193. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal information which we collect or obtain about you in connection with the GMFEIP.
- 1.4 This Privacy Notice applies to anybody who registers for and/or engages with any GMFEIP activities. This Privacy Notice covers the personal information that Oldham College collects in connection with each such activity and in connection with each such individual's involvement with us.
- 1.5 You promise that any information you supply to us is accurate and up-to-date, that you will inform us if any such information requires updating, and that where you submit any other person's details to us you have that other person's permission or are otherwise legally permitted to do so on their behalf.
- 1.6 You have the right to lodge a complaint with the Information Commissioner's Office ("ICO") if you have any concerns with regard to the way in which we process your personal information. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact Oldham College in the first instance.
- 1.7 Please note that this Privacy Notice does not relate to any activities of Oldham College other than in its capacity as lead member for the GMFEIP. For example, if you are an individual who participates in any of Oldham College's non-GMFEIP courses or events, or you apply for a job with Oldham College, or you visit the Oldham College website, then a specific privacy notice for that other relationship will apply (as notified to you separately by Oldham College when first collecting any personal information from you in relation to any such arrangements).

2. What information do we collect and how do we use it?

Individual Participants in GMFEIP activities

- 2.1 Where you submit an enquiry or otherwise register in relation to any GMFEIP activity (including but not limited to our Innovation Connector Network, our GM Colleges CPD Programme and/or our Innovation Literacy programme we may collect the following information from and about you during the initial diagnostic/engagement process and in connection with your subsequent participation on that GMFEIP activity itself:
- (a) your name, contact email address (which may be an email address belonging to the organisation that you represent if applicable), contact telephone number (optional) and a brief description of your role within your organisation (e.g. director, entry-level or apprentice);
 - (b) records of your attendance and/or participation in that GMFEIP activity (including your completion of any relevant online assessment modules);
 - (c) any feedback that you may provide to us in connection with the relevant GMFEIP activity or our services in general;
 - (d) (in addition where you register to attend any of our in-person events, including business networking, celebrations, training, workshops and continuous professional development events) details of any dietary requirements; and
 - (e) (in addition where you engage with our GM Colleges CPD Programme) details of your qualification history.

Please note that for our Innovation Literacy programme, we may be provided with your email address and/or contact telephone number by the Greater Manchester Colleges Group member that you are enrolled with.

- 2.2 The information described in section 2.1 above will be used by Oldham College (in its capacity as lead member for the GMFEIP) as necessary for Oldham College's legitimate interests in the circumstances described below:
- (a) to process your enquiry and/or registration on the GMFEIP activity in question and allow you to participate in that GMFEIP activity as appropriate;
 - (b) to monitor, report on and assess your level of progress during your participation in that GMFEIP activity (including the making of any relevant recommendations);
 - (c) (if applicable) to notify your organisation of any relevant matter relating to you which arises during your participation in that GMFEIP activity (for example, any concerns we may have in relation to your participation during your involvement with that GMFEIP activity);
 - (d) (if applicable) to carry out our obligations arising from any contract entered into between us and the organisation that you represent;
 - (e) (if applicable) to conduct any relevant due diligence in relation to any potential grant support that may be relevant to you or your organisation;
 - (f) (if applicable) to send any related certificates or digital accreditation to you;

- (g) (if applicable) to communicate with you in relation to your registration for, and participation in, any relevant event (including to send you copies of any related resources);
- (h) where it is necessary to establish, exercise or defend any legal claim;
- (i) to deal with and respond to any queries, enquiries or complaints that we receive;
- (j) in connection with any internal or external audit that we undergo; and
- (k) to assess and improve the quality of our services.

2.3 We may also use the following more sensitive examples of personal information about you in certain limited circumstances as follows:

- (a) (where you register to attend any of our in-person events, including business networking, celebrations, training, workshops and continuous professional development events) we may collect personal data in relation to your health and/or religious beliefs where you provide any such information to us in connection with any special dietary requirements and/or access requirements that you notify us of.

In such circumstances we will use any information that you disclose to us about your health (including any medical condition and/or disability status) in connection with our legal requirements to consider whether we need to provide appropriate adjustments during the event (for example to enable you to safely access and attend the event) or (in the case of special dietary requirements including any information that you tell us regarding religious beliefs) for the purposes of complying with our health, safety and equality law obligations connected with the running of the event. Please note that we may disclose such information to any relevant venue for such purposes;

- (b) where it is necessary to establish, exercise or defend any legal claim; and
- (c) we may also from time to time ask for certain types of particularly sensitive information (such as in relation to your gender, ethnic background and/or medical condition) in connection with our legal obligations relating to equality and diversity. Your disclosure of such information to us for this purpose will be entirely optional and on an anonymous basis. Such data shall (where disclosed by you to us for this purpose) be used by us in relation to our compliance with those legal obligations.

2.4 In limited circumstances, Oldham College may approach you for your consent to allow us to process certain information for purposes connected with GMFEIP which are not referred to in this Privacy Notice. If we do so, we will provide you with details of the information we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of any contract with us that you agree to any request for consent from us. If you do provide us with consent, you will be able to withdraw it at any time via the method that we notify you of when obtaining your consent. Any such withdrawal will not affect the lawfulness of our processing of your personal information based on your consent before you withdrew it.

2.5 If you fail to provide information when requested which is necessary for us to process in connection with any GMFEIP activities, you will be unable to participate in the relevant GMFEIP activity. We may also be in breach of our legal obligations (such as to ensure the health and safety of our staff, contractors, course attendees and any other individuals participating in GMFEIP activities).

- 2.6 No activities of Oldham College in connection with the GMFEIP are determined by automated decision-making.

Information relating to the organisation that you represent (relevant to Innovation Connector Network)

- 2.7 Where you engage with our Innovation Connector Network, we will also collect your organisation's name, website, business postcode, main office location, Companies House registration number (if applicable), full-time employee and apprentice employee numbers and business sector(s), together with details of any previous engagement by your organisation with any further education colleges, your organisation's previous use of innovation support services (if any), and your organisation's approach to innovation strategy and adoption.

Where provided to us by your organisation (at your organisation's discretion), we may also use business-specific information relating to your organisation. This may include details of your organisation's growth plans, turnover, marketing activities, technological innovation and/or visitor information (where your organisation visits any Greater Manchester Colleges Group member's premises).

We may use such information about your organisation for the purposes referred to in section 2.2 above.

3. Case Studies and Member College Marketing Materials

- 3.1 Where you have given Oldham College your corresponding consent, we and/or any Greater Manchester Colleges Group member may:
- (a) refer to your involvement in the GMFEIP in materials and case studies relating to innovation projects (case studies will detail the business challenge being addressed, the support provided by GMFEIP, the corresponding outcomes and impact, together with a related quote and photograph); and/or
 - (b) use your name and email address to send you information and marketing materials relating to events, services and opportunities provided by Greater Manchester Colleges Group members outside of the GMFEIP.
- 3.2 You may withdraw your consent to us using your information for the purposes mentioned in section 3.1 above at any time. This can be done by e-mailing us at gdpr@oldham.ac.uk, writing to us at The Data Protection Officer, Oldham College, Rochdale Road, Oldham, Lancashire, OL9 6AA or clicking on the appropriate link of any of our related e-mails. Any such withdrawal will not affect the lawfulness of us using your information for such purpose(s) before you withdrew your corresponding consent.
- 3.3 Please note that if you withdraw (or do not provide) your consent to being sent such information and marketing materials, this will mean that you will not be notified of any events, services and opportunities provided by us or any other Greater Manchester Colleges Group members outside of the GMFEIP.

4. To whom will Oldham College disclose your personal information obtained in connection with the GMFEIP?

You will be asked before Oldham College discloses your GMFEIP-related personal information to third parties, unless:

- 4.1 they are only processing your information on Oldham College's behalf for specified purposes in accordance with our instructions;

- 4.2 such disclosure is required by law;
- 4.3 the third party is providing us with services or professional advice where necessary for our legitimate interests and permitted by law (e.g. external venues and events management companies hosting or otherwise supporting our events, external evaluation service providers, or other Greater Manchester Colleges Group members who are providing support to us in connection with the GMFEIP activities);
- 4.4 the disclosure is necessary for our legitimate interests in connection with obtaining or maintaining any accreditations relating to your participation on any of our GMFEIP activities or events, including but not limited to OCN London and SIAS;
- 4.5 the disclosure is necessary for our legitimate interests in complying with our reporting obligations to Greater Manchester Combined Authority (GMCA) (our funder for the GMFEIP activities). This may include disclosure by us to GMCA's own agents appointed by GMCA to conduct such matters on GMCA's behalf;
- 4.6 the disclosure is to one of the other Greater Manchester Colleges Group members or one of our suppliers in respect of any feedback that you provide to us relating to any GMFEIP activities and it is in our legitimate interests in improving our GMFEIP activities for the relevant member/supplier to be able to use that feedback;
- 4.7 the disclosure is in connection with criminal investigations, legal proceedings or prospective legal proceedings where necessary for our related legitimate interests and permitted by law;
- 4.8 the disclosure is necessary for our legitimate interests in establishing, exercising or defending our legal rights (including providing information to others for the purposes of fraud prevention) and permitted by law;
- 4.9 the disclosure is necessary to protect the interests of you or another person where you are physically or legally incapable of giving us your consent;
- 4.10 the disclosure is in connection with a proposed transfer of any part of our operations or assets (in which case we may disclose your personal information to the prospective acquiror of such operations or assets and/or their professional advisors) or the proposed acquisition of substantially all of our assets by a third party. Any such disclosure will be made where necessary for the legitimate interests of us and/or the third party in respect of the proposed transaction; however, we will not transfer your personal information to any such third party unless we are satisfied that they are able to provide an adequate level of protection in respect of your personal information; or
- 4.11 we have stated or informed you otherwise (including elsewhere in this Privacy Notice) and such disclosure is permitted by law.

Please note that where we disclose your personal information to any other Greater Manchester Colleges Group member, to GMCA or to any other third party in connection with the GMFEIP (other than as mentioned in section 4.1 above), the third party in question will also become a controller of any such information. That third party will assume corresponding responsibilities under applicable data protection legislation. Such information will be subject to the third party's corresponding privacy notice which you should read (e.g. the relevant member college's own privacy notice, or GMCA's privacy notice accessible via <https://www.greatermanchester-ca.gov.uk/who-we-are/accounts-transparency-and-governance/privacy-policy/>). Oldham College is not liable for the privacy notices, policies or practices of such third parties in respect of your personal information.

5. Your rights

- 5.1 You have a legal right to see a copy of the personal information that Oldham College keeps about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:
- (a) request that we erase any personal information held about you;
 - (b) restrict our processing of your personal information (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
 - (c) data portability (i.e. to request the transfer of personal information to a third party); and
 - (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party).
- 5.2 Requests in respect of the above should be made in writing to our Data Protection Officer at Oldham College, Rochdale Road, Oldham, Lancashire, OL9 6AA or via email at gdpr@oldham.ac.uk. Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).
- 5.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 5.1 above.
- 5.4 You will not generally have to pay a fee to exercise any of your rights described in section 5.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively, we may refuse to comply with your request in such circumstances.

6. Security, retention and destruction of your personal information

- 6.1 We have put in place 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, agents, contractors and other third parties who have a business or operational need to know that information.
- 6.2 We have put in place procedures to deal with any suspected data security breach and will notify you and/or any applicable regulator of a suspected breach where we are legally required to do so.
- 6.3 Any personal information held by us in relation to any of the purposes described in this Privacy Notice will be retained by us for as long as we need it to fulfil the purpose(s) for which it was collected (including for the purposes of satisfying any legal, accounting or reporting requirements such as to GMCA— certain information may be held for up to 10 years for these purposes). Further details of our specific retention periods are set out in our information retention policy (a copy of which is available upon request from our Data Protection Officer).
- 6.5 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data for; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it; securely delete personal data that is no longer

needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

7. How will you know if Oldham College makes any changes to this Privacy Notice?

- 7.1 This Privacy Notice does not form part of any contract to provide services.
- 7.2 Oldham College may amend this Privacy Notice at any time. If we make any changes to the way in which we use your personal information we will notify you by writing to you or by sending you an e-mail.

8. Contact

If you have any questions about this Privacy Notice or Oldham College's treatment of your personal information, please contact our Data Protection Officer by email at gdpr@oldham.ac.uk.