



Skills and Employment Privacy Notice

Last updated: 19 November 2025

Introduction

Cheshire West and Chester Council's Skills and Employment Service supports local residents who face barriers to finding and sustaining employment. The service is delivered through two main strands:

- **Skills Support:** providing access to training, qualifications, and personal development opportunities to help individuals upskill and prepare for work
- **Employment Support:** offering one-to-one mentoring, job search assistance, and in-work support to help individuals find and retain suitable employment

Support is delivered through Skills and Employment Hubs, funded projects, and community-based outreach. The service works holistically with individuals, often liaising with family members, referrers, probation officers, and other support networks to ensure tailored and effective employment support.

To ensure the safety of staff, other service users, and the wider community, the service may need to understand any restrictions or risks associated with criminal convictions. This helps us deliver support in appropriate settings and comply with any legal or safeguarding requirements. Criminal conviction data is only collected where necessary and is handled with strict confidentiality and safeguards.

What Information We Collect, Use, And Why

Whenever you engage with the Skills and Employment service, whether in person, by phone or online, we collect specific information to help us provide effective, safe and tailored support. This includes helping you access training, mentoring and employment opportunities, and ensuring services are delivered in a way that protects both you and others.

We collect the following types of information:

Personal Data

- **Name, address and contact details:** to identify you, confirm your eligibility for local services, and communicate with you about appointments, training sessions and employment support
- **Date of birth:** to verify your eligibility for specific programmes and to understand the age profile of service users for reporting and funding purposes
- **National Insurance number:** to confirm your right to work and meet the requirements of publicly funded employment support programmes
- **Employment and education history:** to tailor support to your experience, qualifications and aspirations, and to help match you with suitable training or job opportunities
- **Financial circumstances** (e.g. working hours, income): to identify any financial barriers to employment and determine eligibility for support such as travel costs or work-related expenses
- **Lifestyle and social circumstances:** to understand any factors that may affect your ability to work or train, such as caring responsibilities, volunteering experience or housing instability





- **Emergency contact details:** to ensure we can reach someone on your behalf in case of an emergency during service delivery
- **Case file information:** to maintain accurate records of your engagement with the service, including session notes, action plans, progress tracking and outcomes

Special Category Data

- **Physical or mental health information:** to understand and address health-related barriers to employment, ensure appropriate support is in place, and discuss reasonable adjustments with employers or training providers
- **Racial or ethnic origin:** to monitor equality of access and outcomes, and to ensure our services are inclusive and responsive to the needs of all communities
- **Religious or other beliefs:** to respect your beliefs and ensure services are delivered in a culturally sensitive and inclusive way

Criminal Offence Data

- **Criminal convictions and restrictions** (e.g. probation conditions): to assess any risks to staff, other service users or the public, to ensure services are delivered safely in shared or community settings, and to comply with any legal or safeguarding requirements. This information also helps us adapt our support appropriately and avoid placing you in situations that may breach legal restrictions or conditions of your sentence.

Sources Of Information

We collect information directly from you when you register with the Skills and Employment service and throughout your engagement with us. This includes details you provide during mentoring sessions, training activities and ongoing support.

We also receive information from other sources where necessary to deliver services effectively and safely. These sources include:

- Referring organisations such as the Department for Work and Pensions (DWP), Jobcentre Plus, other local authorities and commissioned partners who refer you to our service.
- Health and social care professionals including GPs, mental health services, social prescribers and support workers, where relevant to understanding barriers to employment or training.
- Probation services where you are subject to probation conditions, to ensure services are delivered safely and in compliance with any restrictions.
- Family members or emergency contacts where we are unable to reach you directly or where additional support is needed.
- Other teams within Cheshire West and Chester Council where you are receiving support from multiple services and information sharing is necessary to coordinate your support.
- Support groups and community organisations that are working with you and can help us understand your needs and tailor our support.

We only collect information from these sources where it is relevant, necessary and proportionate to the support we are providing.



What Is Your Personal Information Used For?

We use your personal information to deliver employment and training support that is tailored to your individual needs. This includes:

- Providing you with access to services such as mentoring, training, qualifications and job search support.
- Assessing your eligibility for funded programmes and ensuring you meet the criteria for support.
- Understanding your barriers to employment so we can offer appropriate interventions, referrals and adjustments.
- Planning and improving our services by analysing anonymised data to understand service demand, effectiveness and outcomes.
- Coordinating support across teams and partners where multiple services are involved in helping you into work or training.
- Ensuring safe service delivery by identifying any risks to staff, other service users or the public, including where criminal conviction data is relevant.
- Reporting to funding bodies and auditors to evidence outcomes and demonstrate the impact of our services.
- Responding to queries, complaints or safeguarding concerns in line with our legal and organisational responsibilities.

We only use your information where it is relevant, necessary and proportionate to the support we are providing.

Who Do We Share Your Information With?

We only share your personal information where it is necessary to deliver services, meet legal obligations or ensure your safety and the safety of others. Information is shared with the following organisations and teams:

- Other teams within Cheshire West and Chester Council: Where you are receiving support from multiple services, we share information to coordinate your support and avoid duplication.
- Probation services: Where you are subject to probation conditions, we share relevant information to ensure services are delivered safely and in compliance with any restrictions.
- Health and social care professionals: Including GPs, mental health services and social prescribers, where sharing is necessary to support your health-related barriers to employment.
- Referring organisations: Such as the Department for Work and Pensions (DWP), Jobcentre Plus and commissioned partners, to confirm referral details and coordinate support.
- Funding bodies and auditors: To evidence outcomes, demonstrate service impact and meet reporting requirements. Only the minimum necessary information is shared for these purposes.
- Support groups and community organisations: Where they are actively involved in supporting you and collaboration is necessary to deliver joined-up support.
- Emergency contacts or family members: Where we are unable to reach you directly or where additional support is needed to ensure your wellbeing.





We ensure that any sharing of information is proportionate, relevant and carried out securely. Criminal conviction data is only shared where necessary to ensure safe service delivery and compliance with legal or safeguarding requirements.

Fraud Prevention And Identity Verification

To protect public funds and ensure the integrity of our services, we may share your personal information with fraud prevention agencies. This helps us:

- Verify your identity
- Prevent and detect fraud, money laundering or other unlawful activity
- Comply with funding conditions and legal obligations

If fraud is detected, you could be refused access to certain services, financial support or employment opportunities.

We rely on the following lawful bases for this processing:

- Legal Obligation (UK GDPR Article 6(1)(c)): We are required to take steps to prevent fraud and misuse of public funds.
- Public Task (UK GDPR Article 6(1)(e)): Processing is necessary to carry out functions in the public interest, including protecting the integrity of employment and training programmes.
- Substantial Public Interest (UK GDPR Article 9(2)(g) and DPA 2018 Schedule 1): Where special category data is involved, processing is carried out to prevent unlawful acts and protect the public.

We rely on legislation including:

- Fraud Act 2006
- Welfare Reform Act 2012
- Local Government Finance Act 1992

All sharing is carried out securely and proportionately, and only where necessary to meet our legal and public responsibilities.

Data Processors

To deliver the Skills and Employment service effectively, we use external organisations known as data processors. These processors provide secure systems and tools that help us manage your personal information, track progress and report outcomes.

The data processors we use include:

- Evolutive: This is our case management system used to record your contact with us, manage mentoring and training session notes, track progress against action plans and monitor outcomes.
- Customer Relationship Management (CRM) systems: These systems are used to securely store and manage personal information including employment history, health barriers,



support needs and service outcomes. They help us coordinate support across different teams and projects.

- Education and training databases: Used by our education teams to manage course enrolments, qualifications, attendance and achievement records.
- Secure reporting tools: These include systems that help us structure and analyse anonymised data for reporting to funding providers, auditors and evaluation teams.

All data processors act under our instruction and are contractually required to comply with data protection legislation. They do not use your information for their own purposes. Access to your data is restricted to authorised personnel only, and all systems are subject to appropriate security controls including encryption, access management and audit logging.

Data Controller

Cheshire West and Chester Council is the Data Controller for this processing.

The Lawful Basis For Processing

We collect and use your personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful bases we rely on vary depending on the type of data and the purpose of processing.

Personal Data (UK GDPR Article 6)

We process your personal data under the following lawful bases:

- Public Task (Article 6(1)(e))
The Skills and Employment service is delivered as part of Cheshire West and Chester Council's public responsibilities to support residents into work and training. This includes providing mentoring, job search support, and access to funded qualifications. Processing your data is necessary to carry out these functions in the public interest.
- Legal Obligation (Article 6(1)(c))
We are required to process certain information to meet legal obligations, such as verifying your right to work, complying with funding conditions, and reporting to government agencies.
- Contractual Obligation (Article 6(1)(b))
Where you enter into a service agreement with us (for example, to participate in a funded training programme), we process your data to deliver that service and meet the terms of the agreement.
- Consent (Article 6(1)(a))
In some cases, we ask for your consent to use your information for specific purposes, such as contacting you about future opportunities or using your feedback in service evaluations. You can withdraw your consent at any time by contacting the service.



Special Category Data (UK GDPR Article 9 and DPA 2018 Schedule 1)

We collect and use special category data, such as health information, ethnicity and religious beliefs, where it is necessary to deliver inclusive and effective employment and training support. This processing is carried out under the following lawful bases:

- **Employment, Social Security and Social Protection (Article 9(2)(b))**
We process health-related data to support individuals who face barriers to employment due to physical or mental health conditions, disabilities or caring responsibilities. This enables us to provide reasonable adjustments, make appropriate referrals and ensure you can access services safely and effectively.
- **Substantial Public Interest (Article 9(2)(g) and DPA 2018 Schedule 1)**
We process special category data under substantial public interest conditions to ensure fair access to services and to safeguard individuals. This includes:
- **Equality of opportunity or treatment:** Monitoring and improving access to services for underrepresented groups, and ensuring our support is inclusive and responsive to diverse needs.
- **Support for individuals with a particular disability or medical condition:** Tailoring mentoring, training and employment support to your specific needs, and ensuring appropriate adjustments are in place.
- **Safeguarding of individuals at risk:** Ensuring safe service delivery for individuals who may be vulnerable due to health, social or personal circumstances.

Criminal Offence Data (UK GDPR Article 10 and DPA 2018 Schedule 1)

We collect and use information about criminal convictions and restrictions where it is necessary to assess risk and ensure safe service delivery. This processing is carried out under the following conditions:

- **Preventing or Detecting Unlawful Acts (Schedule 1, Paragraph 10)**
We use this information to avoid situations that could breach legal restrictions or probation conditions, and to ensure services are delivered lawfully and safely.
- **Protecting the Public (Schedule 1, Paragraph 19)**
We process this data to safeguard staff, other service users and the wider community, particularly when services are delivered in shared or community settings.

All criminal offence data is handled with strict confidentiality and appropriate safeguards, including limited access, secure systems and clear documentation of decisions.

Legislation We Rely On

When using your personal information to meet our legal obligations or deliver services as part of our public tasks, we rely on the following legislation, among others:

Care Act 2014

This Act sets out the general responsibilities of local authorities in relation to adult care and support. It includes duties to:

- Promote individual wellbeing, including participation in work, education and training
- Prevent or delay the development of care and support needs



- Provide information and advice to help people make informed decisions
- Safeguard adults at risk of abuse or neglect
- Co-operate with other organisations to deliver joined-up support

Employment and Training Act 1973

Provides the legal foundation for public authorities to assist individuals in selecting, training for, obtaining and retaining employment.

Local Government Act 1972 and 2000

Establish the general powers and duties of local authorities, including the delivery of services that promote economic, social and environmental wellbeing.

Equality Act 2010

Ensures fair treatment and equal access to services, and supports monitoring and improvement of outcomes for individuals with protected characteristics.

UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018

Govern how we collect, use and protect your personal data, including special category and criminal offence data, and set out the lawful bases for processing.

Apprenticeships, Skills, Children and Learning Act 2009

Supports the provision of training and skills development, particularly for young people and those entering the workforce.

Welfare Reform Act 2012

Relevant where employment support is linked to benefit eligibility or conditionality, and where data is shared with the Department for Work and Pensions (DWP).

Children and Families Act 2014

Supports young people with Special Educational Needs (SEN) up to age 25 through Education, Health and Care (EHC) plans and promotes preparation for employment.

Education and Skills Act 2008

Requires young people to remain in education or training until age 18 and places duties on local authorities to track participation and support re-engagement for NEET (Not in Education, Employment or Training) youth.

Rehabilitation of Offenders Act 1974

Allows certain convictions to become “spent,” supporting access to employment unless exceptions apply (e.g. roles involving vulnerable groups).

International Data Transfers

While the Skills and Employment service primarily stores and processes personal information within the United Kingdom, there may be occasions where we need to share information with organisations based outside the UK. This could include:

- Liaising with overseas agencies or support organisations involved in your care, training or employment
- Working with international partners to verify qualifications, employment history or support arrangements



- Supporting individuals who have recently arrived in the UK or are returning to another country

Where personal data is transferred internationally, we ensure that appropriate safeguards are in place to protect your information. These safeguards may include:

- Adequacy decisions: Ensuring the country has been recognised by the UK government as providing an adequate level of data protection
- Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs): Legally binding agreements that ensure your data is protected to UK standards
- Technical and organisational measures: Including encryption, access controls and secure data handling procedures

We will only transfer your data internationally where it is necessary, proportionate and lawful, and we will inform you where such transfers occur.

Retention Period

We only keep your personal information for as long as it is needed to deliver the Skills and Employment service and to meet legal, contractual or reporting requirements. The length of time we retain your information depends on the type of support you receive:

Employment support-related information: Retained for 5 years from the date of last contact. This includes mentoring records, job search support, and progress tracking.

Education and training-related information: Retained for 7 years from the date of course completion or last engagement. This includes enrolment details, qualifications, attendance and achievement records.

Where your information is used for research, evaluation or reporting purposes, it will be anonymised. Any identifiable notes or documents will be securely destroyed once no longer needed. Anonymised data may be retained indefinitely for statistical and historic analysis.

Retention periods are determined based on business needs, legal obligations and best practice guidance, including from the Information Commissioner's Office (ICO) and relevant government departments.

Your Rights

The UK GDPR provides you with a several rights to control what personal information is used by us and how it is used by us.

Further guidance about these rights can be accessed from the [Information Commissioner's Office \(ICO\) website](#)

If you are not happy about the way your personal data is being used, or you require further information about how we process your personal data, you can contact Council's Data Protection Team:-

Online: [Contact the DPO](#)





By post: Data Protection Officer, The Portal, Wellington Road, Ellesmere Port, CH65 0BA

You also have the right to complain to the Information Commissioner's Office using the following details:

Website: [Information Commissioner's Office \(ICO\)](#)

Instant Message: [Live Chat](#)

By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113