

London Talent Pathways

Privacy Notice for Learners

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Privacy Notice for Individuals

London Talent Pathways Privacy Notice for Learners

This privacy notice explains how the Greater London Authority (GLA), collects and processes your personal data in relation to the Adult Skills Fund (ASF) London Talent Pathways (LTP) Fund. The GLA is committed to protecting your privacy and your rights under UK Data Protection legislation.

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in July 2026.

Who we are

The Greater London Authority (GLA) is London's regional government. The Mayor of London provides citywide leadership, and the London Assembly is responsible for holding the Mayor and his advisors to public account. Find out more about what we do and whom we work with at www.london.gov.uk.

The Mayor of London is responsible for the ASF provision for learners within Greater London. Responsibility for courses funded by ASF is delegated, as part of London's Integrated Settlement, from the Department for Work and Pensions (DWP) to the Mayor of London for residents who live in London.

For the purposes of relevant data protection legislation, the GLA is one of the data controllers for personal information processed as part of the London Talent Pathways programme.

More information about how the GLA handles personal information is published here:
<https://www.london.gov.uk/about-us/governance-and-spending/privacy-policies/gla-privacy-policy>.

Personal data we collect and process

Learners' personal information is collected nationally by the Department for Education (DfE) on behalf of DWP and is used by the DfE and DWP to exercise its functions and to meet its statutory responsibilities in relation to ASF.

The DfE is the data controller for this information. If you would like to exercise your rights in respect of the DfE data collection, please follow the process as detailed in the DfE's Privacy Notice (<https://guidance.submit-learner-data.service.gov.uk/26-27/ilr/ilrprivacynotice>).

Learner information collected by the DfE is known as the Individualised Learner Record (ILR). The specification and standards for the ILR are published for each academic year (1 August to 31 July) by the DfE (<https://www.gov.uk/government/collections/individualised-learner-record-ilr>). This specification provides more information about what personal information is being collected and processed by the DfE.

The learner information collected by the DfE is shared with the GLA, which operates as a data controller of your personal data under data protection law. Personal information is collected by the DfE for the GLA in accordance with the terms and conditions of funding imposed on providers of learning, for example, further education colleges and private training organisations. The GLA is required to process your personal data to enable it to carry out its functions and statutory responsibilities.

In addition, the GLA will collect some supplementary information to support the validation and payments of any job outcomes claimed by providers under LTP. Supplementary data collected may also be used in any evaluation of LTP.

The information may include the following:

- Employer name
- Job title
- Occupation
- Employment type (including self-employment)
- Salary and earnings
- Working arrangements (contract type, hours per week, duration of employment etc.)
- Workplace location

Information about use of and access to your personal data held by the GLA, details of organisations with whom the GLA regularly share data, information about how long the GLA retain your data, and how to exercise your rights in respect of the information collected by the GLA is set out in further detail in this privacy notice.

Our legal basis for collecting your personal information

We collect and process personal information only where necessary and where permitted by law. The lawful bases relied upon for the London Talent Pathways programme are:

- Article 6(1)(e) UK GDPR – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the GLA.
- Article 6(1)(f) UK GDPR – processing is necessary for the purposes of legitimate interests pursued by the GLA or a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the individual.

This includes processing personal information for programme delivery, funding assurance, learner eligibility and participation checks, audit purposes, evaluation, and the prevention and detection of fraudulent claims. For special category data, the lawful basis is:

- Article 9(2)(g) UK GDPR and Schedule 1, Part 2, Paragraph 8 of the Data Protection Act 2018 – processing is necessary for reasons of substantial public interest, specifically equality of opportunity or treatment.

The GLA may use learner contact information for programme management, assurance, verification, fraud prevention and evaluation purposes. We aim to collect only the minimum amount of personal data necessary for these purposes.

How long we will keep your personal data

We will keep your personal data in its original format for a maximum of six years, after which it will be securely destroyed.

A different retention period applies to data collected for research purposes; please see the [London Learner Survey privacy policy](#) for more details.

Request to access, rectify or erase your information

Under the Data Protection Act 2018, you are entitled to ask if we hold information relating to you and ask for a copy, by making a 'subject access request'. This service is optional for individuals to use. As part of the public task and legitimate interest purposes we collect personal information and use this to link to government administrative records on income, employment, and benefits.

If learners decide they do not want their data used on an ongoing basis for research, they can notify the GLA and withdraw from the training. No further data will be collected/linked on that individual beyond that point. Your data protection rights;

- The right to rectification: you have the right to request to correct any information that you believe is inaccurate.
- The right to erasure: you have the right to request for your information to be erased, under certain circumstances.
- The right to restrict processing: you have the right to request that the GLA restricts the processing of your personal data, under certain circumstances.
- The right to object to processing: you have the right to object to GLA's processing, under certain circumstances.
- The right to data portability: you have the right to move your personal data to another data controller.

In the following circumstances please contact the Data Protection Team at: Data.Protection@london.gov.uk

- If you have a concern about the accuracy of personal information about you
- If you want to erase or restrict the use of your personal information
- If you object to the use of your personal data
- If you wish to exercise your rights in relation to automated decision-making
- If you are unhappy with how we have used your personal information

You can also find more information from the Information Commissioner's Office at <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Your right of complaint

Following the introduction of the Data Use and Access Act (DUAA) 2025, the GLA is required to have a data protection complaints process in place. Please contact Data.Protection@london.gov.uk if you are unhappy with how the GLA have used your personal information or [use our 'Contact Us' form](#).

The ICO will require you to have exhausted the GLA's complaints process before contacting them about the same issue. If you remain dissatisfied with the GLA's response, you are entitled to raise a concern with the Information Commissioner's Office (ICO), the UK's independent body set up to uphold information rights.

If you have any questions about how your personal information will be used, please contact us at: ASF@london.gov.uk

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