

GM Clean Air Financial Support Scheme

Introduction

Transport for Greater Manchester (TfGM) is committed to making sure that we tell you about the ways in which we use your personal information and that we have the right controls in place to make sure it is used responsibly and kept safe from inappropriate access, theft, or misuse.

The Clean Air Zone

The original Greater Manchester (GM) Clean Air Plan (GM CAP) included a GM-wide category C charging Clean Air Zone. Only the most polluting vehicles which don't meet emission standards would have been charged to drive in the Zone.

The Clean Air Zone was designed to comply with a legal direction from government issued before the coronavirus pandemic. Since then, there have been significant vehicle supply chain issues, particularly for vans, and the cost of living has increased. This meant that the original Clean Air Plan was unworkable. It would not have met the obligations in the direction to achieve compliance with the legal limit for harmful nitrogen dioxide (NO₂) air pollution by 2024 and could have caused significant financial hardship for people affected.

The Government has now agreed to lift the legal direction that GM should achieve compliance with legal NO₂ limits by 2024. It has issued a new direction for compliance in the shortest possible time and by no later than 2026.

GM has secured £120m in government funding to help eligible owners of vehicles which would be non-compliant in a Clean Air Zone upgrade to compliant vehicles. Government has said this funding will continue to be available for the new Clean Air Plan. This is available now.

The Financial support fund is part of the Financial Support Scheme of the GM CAP which in this case would offer subsidies to HGV, LGV, coach, minibuss, hackney carriage and PHV operators to retrofit or to support the replacement of non-compliant vehicles.

In November 2020 a grant-making and administration system was procured to assist in the distribution of funding to eligible bus operators. The system is a SaaS solution (Flexi-Grant provided by Fluent Technology). This system was further developed to handle HGV applications from the end of November 2021. From the end of February 2022 the system now allows HGV, LGV, coach, minibuss, hackney carriage and PHV operators to register and input company and vehicle information for TfGM to assess eligibility for funding.

TfGM is the data controller for the Financial Support Scheme and Fluent Technology are our processor. Fluent Technology use a sub-processor; Mailgun to manage emails on behalf of Fluent.

This notice explains how we will use your information and tells you about your privacy rights and how the law protects you.

For further information about our core data protection obligations and commitments please see TfGM's primary privacy notice. <https://tfgm.com/privacy-policy> and for the GM Clean Air Zone the privacy notices at <https://cleanairgm.com/privacy-policies/>

What information do we collect and why?

Personal data that will be collected includes:

- Name of the applicant

- Organisation Email address
- Organisation Address/postcode
- Organisation phone number
- Personal email address, address, and telephone number

Other data that may be collected depending on organisation and vehicle types includes:

- Company Number / Financial Conduct Authority Number / Charity Number
- HGV Operator Licence Number
- Vehicle registered address
- Vehicle Details
- Taxi licensing information
- Calls made to the dedicated TfGM contact number will be recorded for monitoring and training purposes.

This information is required to be able to process your application and administer the funds.

We may also use this data to contact you at a later date for the evaluation of the Financial Support Scheme.

How do we keep your information safe?

TfGM is committed to the security of the information we collect, and we use reasonable measures to prevent unauthorised access to that information. We are required to demonstrate that our solutions meet the required levels of personal, procedural, policy, data and technical security. We will only process personal information for the purposes it has been collected or subsequently authorised. Fluent and the Flexi-Grant system are ISO27001 certified and Cyber Essentials Certified. All electronic consultation information will be encrypted with a secure password. Fluent and TfGM will restrict access to your personal information.

How long is the information kept for?

TfGM will only hold your data for as long as necessary. Information will be kept for a minimum of 5 years from the allocation of the grant plus a further 2 years. Your information will then be securely deleted unless we are obligated to keep the data for any lawful purpose.

Where is the data processed?

The data within the Flexi-Grant system is stored and processed within the UK, however Mailgun will be used to manage emails to and from Flexi Grant, and this data will be hosted and processed in the EU.

For any further information about how your data is processed by them please click on the below link:

<https://www.mailgun.com/gdpr/>

Lawful basis for processing your information

Our lawful basis for processing under GDPR is:

- **GDPR Article 6(1)(e)**: the processing is necessary for the performance of its official tasks carried out in the public interest

Who will we share your information with?

The information collected will be stored in the Flexi-grant system and will be used by TfGM. In the event that large volumes of applications are received TfGM have contracted with a third party, ESP, to help with

the verification of eligibility of applications. Your personal data will not be shared with any other third parties.

Your rights as a data subject (any individual person who can be identified)

The GDPR gives you the following rights over your information:

- **Your right to get copies of your information**
You have the right to ask for a copy of any information about you that is used.
- **Your right to get your information corrected**
You have the right to ask for any information held about you that you think is inaccurate to be changed.
- **Your right to limit how your information is used**
You have the right to ask for the use of any information held about you to be restricted. For example, you can ask this where you think the information TfGM is using is inaccurate.
- **Your right to object to your information being used**
You can ask for any information held about you not to be used. This is not an absolute right and TfGM may need to continue to use your information. We will tell you why if this is the case.
- **Your right to get your information deleted**

You can ask for any information held about you to be deleted. This is not an absolute right and TfGM may need to continue to use your information. We will tell you why if this is the case.

To find out what information we hold about you, you need to make a Subject Access Request. If you wish to exercise any of your information rights including making a Subject Access Request, please contact us [on data.protection@tfgm.com](mailto:data.protection@tfgm.com).

If you are not satisfied with the response from us, you can complain to the Information Commissioner's Office. For further details on this and your information rights please visit the Information Commissioner's Website.

Data Protection Officer (DPO)

TfGM is required by law to have a DPO. The DPO has several duties, including:

- Monitoring the organization's compliance with data protection law;
- Providing expert advice and guidance on data protection;
- Acting as the point of contact for data subjects; and,
- Co-operating and consulting with the Information Commissioner's Office (see 'Complaints' below).

For further information about anything in this privacy notice, to find out what information we hold about you, or if you wish to exercise any of your other information rights, please contact us at data.protection@tfgm.com

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Further information about data privacy and your rights under the General Data Protection Regulation (GDPR) can be found at the ICO website www.ico.org.uk/for-the-public.