

General Data Protection Regulations

Covid-19

Given the current issues relating to the Covid-19 outbreak, the organisation continues to implement a review and assess policy based on day to day government guidance. The organisation will comply with all government guidelines and will update its actions according to prevailing circumstances

This notice is to inform individuals and organisations we work with about what we do with personal information that we collect.

This privacy notice will be updated from time to time in order to comply with legal requirements if they involve any substantial changes to the way in which we collect, store and use the information we have about you.

Steadfast Training Ltd is an independent Training Provider delivering vocational training and apprenticeships through government funded contracts as well as online and commercial training courses.

We are a 'data controller' as defined by the General Data Protection Regulations (2018) for personal data processed by ourselves and other third party organisations who are contracted with us to process data on our behalf. We have agreed with these organisations the way in which your personal data is processed and we are responsible to you for the way in which your personal data is collected and processed. We will only use your personal data in ways which are compliant with current data protection legislation.

Steadfast Training Ltd is registered with the Information Commissioner's Office, Registration number: Z9666546 and our registration can be viewed at <https://ico.org.uk/ESDWebPages/Entry/Z9666546>

Steadfast Training Ltd has appointed a Data Protection Officer (DPO) to ensure that the organisation is compliant with GDPR and to oversee our data protection processes and procedures.

They can be contacted at:

Data Protection Officer, Steadfast Training Ltd, 5 Enterprise Way, Pinchbeck Spalding PE11 3YR or email: gdpr@steadfasttraining.co.uk

Where you have concerns about the way we handle your personal information or if you would like any further details, please contact our DPO. Where we are not able to resolve any queries or concerns, you are able to contact the Information Commissioner's Office via their website at [https://ico.org.uk/for-the-public/raising - concerns/](https://ico.org.uk/for-the-public/raising-concerns/)

Why do we collect and process information?

We process your personal information to enable us to provide education and training to our customers and clients; to maintain our own records; to comply with the requirements of our funders including:

- Department of Education
- Department for Work and Pensions
- Education and Skills Funding Agency

What information do we collect?

We generally collect personal information to comply with the requirements of our funding authorities as set out in our contracts with them. This information is collected and shared with them as part of our contractual obligations and in order to support the delivery of the training we provide to you.

The majority of the information we ask you to provide for us is mandatory i.e. Without the information we would not be able to enrol you on the course or apprenticeship you choose. Sometimes we will ask you to provide us with further information on a voluntary basis and where this is the case we will always ensure that we ask for your consent for us to process this.

All information is collected and processed strictly in accordance with the relevant GDPR legislation.

The types of information that we are required to collect, hold and share include:

- Personal information (name, address, date of birth; national insurance number; equal opportunities/safeguarding/health and safety)
- Education and employment details
- Financial details (as required)
- Family members
- Training details (attendance; attainment; behavioural information)
- Business details

We also collect and process sensitive types of information which could include:

- Physical or mental health details
- Race or ethnicity
- Religious / other beliefs

We process personal information pertaining to our:

- Customers i.e. employers and learners
Employees

Steadfast Training Ltd does not knowingly request, collect, hold or share personal information from children under the age of 16 or send them requests for personal information.

How and why we share your personal information

In all cases where we share your personal information with a third party organisation, Steadfast Training Ltd ensures that all sharing and processing takes place under the terms of an agreed contract which specifically sets out how the data is to be processed and is subject to a robust data sharing agreement which specifies how the data is to be managed securely.

We are also required to share data with other organisations for statutory purposes. Where this is the case, we use a standard data sharing agreement to set out the specific legitimate and restricted purposes for which the personal information can be used.

Where required by law (or if necessary to continue to support you in your learning), we may also share personal information with:

- Other training providers (where you are transferring to another provider)
- Education and examining bodies
- Current employer
- Professional advisers (anonymised for statistical purposes).
- Employment or recruitment agencies
- Suppliers and service providers
- Persons making an enquiry or complaint
- Government agencies.

We will not share any of your personal information without your consent unless we have a lawful basis for doing so.

Security of your personal information

We regularly review the integrity and security of our data processing and storage systems. These reviews take place to comply with the requirements of our funding authorities and current legislation. All checks and reviews follow those recommended by the Information Commissioner's Office.

All data is securely deleted when it is no longer required for the purpose for which it was collected.

We keep your personal information in compliance with our Data Retention policy, which sets out which information we are required to retain for statutory purposes. Other personal information which does not fall into this category will only be retained as long as required and will then be deleted.

What are your rights over your personal data?

The General Data Protection Regulation (2018) gives you the following rights in relation to the way in which we process your personal data.

You have the right to:

- Be informed about how we process your personal data
- Request access to your personal information that we hold, and be given a copy of it
- Request that your personal information is amended if it is inaccurate or incomplete
- Request that your personal data is erased where there is no statutory or particular reason for us to continue processing it.
- Request that processing of any personal data is restricted
- Object to your personal data being processed by us

ESFA Learner Data

The data is primarily used by the ESFA to carry out its statutory functions on behalf of the Secretary of State (Apprenticeships, Skills, Children and Learning Act 2009), to carry out functions of the Crown or a particular government department.

Personal information provided by learners may be shared with other organisations for the purposes of administration, provision of career guidance and statistical/research purposes relating to education, training, employment and well-being. These other organisations include:

- Department for Work and Pensions
- Department of Education
- Local and Combined Authorities in England
- Organisations performing research and statistical work on behalf of the Department of Education or its partners.

Personal data processed for each learner is collected and processed via the Individualised Learner Record (ILR). The specific requirements for this information are published annually by the Education and Skills Funding Agency.

Learner data is also collected and provided to the Learning Records Service (as required by the ESFA). Learners are issued with a Unique Learner Number (ULN) as a result of this processing and to create and maintain Personal Learning Record. This information is shared with third party organisations such as Colleges and Learning providers.

Apprenticeships

Where individuals wish to apply for apprenticeship opportunities, personal data is processed in order to be able to match an individual to a particular vacancy. Steadfast Training Ltd may act on behalf of an employer to shortlist applicants for interview. This personal information available through the Service enables the ESFA, National Careers Service funded organisations and the DWP, their employees and agents to identify apprenticeship vacancies and pass details of these on to individuals for the purpose of providing careers advice and guidance as appropriate.

Further information

Education and Skills Funding Agency Privacy Notice

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652095/ESFA_privacy_notice.pdf

Department of Work and Pensions

<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>