

## INTRODUCTION

IC Training Centre collects and processes personal data relating to our learners for the purpose of funding and training. We are committed to being transparent about how we collect and use data and to meet the data protection obligations.

This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and how for the purposes of data protection we will be the controller of any personal information.

### **What information does IC Training Centre collect?**

IC Training Centre collects and processes a range of information. This includes, but is not limited to:

- Personal details such as your name, date of birth, address, contact details including email addresses and telephone number, date of birth, gender and contact details
- Race and ethnicity
- Marital Status, next of kin and emergency contacts
- National Insurance Number and Unique Learner Number (ULN)
- Bank account details
- Benefit entitlements
- Information about your nationality and right to work in the UK
- Name of employer, location of employment or workplace
- Driving license, identification documents and information such as passport, birth certificate, identity cards, visas, signature and photographs for purposes of identity
- Information about your criminal record
- Details of prior learning and qualifications including certificates and information from your Personal Learning Record (PLR)
- Passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information that are issued by IC Training Centre
- Records of enquiries and other correspondence with you
- Appeals and complaints related to IC Training Centre
- Safeguarding concerns
- Health and Safety or accident information
- Risk assessments
- All learning documents including coursework, portfolios, assessment evidence, online tutorials, exam results, video and audio recordings, exam and achievement information, written conversations
- Information from surveys or questionnaires taken by IC Training Centre, ESFA or Ofsted

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- Compliance documents including Individual Learning Records, contact logs, progress reviews, exam results, copies of certificates, declarations, commitment statements
- Information on progression following your training
- Audits conducted by awarding bodies, Ofsted and ESFA that may contain your personal details
- Details of periods of leave taken by you, including holidays, sickness absence, family leave, unpaid leave and sabbaticals, and the reasons for the leave
- Information about medical or health conditions, including whether or not you have a disability for which IC Training Centre needs to make reasonable adjustments
- Equal opportunities monitoring information including information about your ethnic origin
- Share internal information, this includes details for the use of training delivery and quality, registration with awarding bodies, use for purposes of health, disability or learning difficulties support, destination data and marketing material.

### **HOW WE COLLECT INFORMATION**

We may collect your personal information in a number of ways, for example from the information you provide to us before joining, during the programme and when you have completed. We will also use the data when you communicate with us by telephone, email, social media or via our website, in various other ways as you interact with us during your time as a learner, from third parties.

In some cases, IC Training Centre may collect personal data about you from third parties, such as your employer, Jobcentre Plus, previous educational establishments and information from criminal record checks permitted by law.

Data will be stored in a range of places, including your personnel file, CRM systems, Google, in our company driver and other IT systems (including IC Training Centre's email system).

### **WHY DOES IC TRAINING CENTRE PROCESS PERSONAL DATA?**

IC Training Centre is required to process data to be used for funding purposes and to meet the obligation of the Education and Skills Funding Agency (please see ESFA Privacy Notice). It may also be used by partners who will use your information for funding purposes. Your data will be used for training purposes, registration with awarding bodies for examinations and qualification achievements, IC Training Centre's online portfolio and/or external online portfolios'. It may also be used to meet obligations with your employer.

In some cases, IC Training Centre is required to process data to ensure that it is complying with its legal obligations. For example, it is required to check your eligibility for the use of government funding, your right to work in the UK and to comply with health and safety laws.

In other cases, IC Training Centre has a legitimate interest in processing personal data before, during and after the end of the training relationship. Processing employee data allows us to:

- Use your coursework, training assessments, video/voice recordings, compliance paperwork and personal details in the case of an Ofsted visit, and ESFA funding audit or assessment from our awarding bodies
- Maintain accurate and up-to-date contact details



- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities and to meet its obligations under health and safety law
- Operate and keep a record of other types of reasons for a break in learning including sickness, redundancy, maternity/paternity etc
- Ensure effective general business administration

Some special categories of personal data, such as information about health or medical conditions, is processed to meet the requirements of the ESFA and to meet law obligations (such as those in relation to learners with disabilities).

Where we process other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for purposes of equal opportunities monitoring.

### **WHO HAS ACCESS TO DATA?**

Your information may be used internally, by the MIS Department, Quality Department, Training Team, Payroll and learner support.

IC Training Centre shares your data with third parties in order to obtain necessary government funding, funding from college partners, to obtain your personal learning record, registration of your training, claiming qualification achievements, audits required from Ofsted or the ESFA.

You may also be contacted by the ESFA or Ofsted as part of their audit process.

### **HOW DOES IC TRAINING CENTRE PROTECT DATA?**

IC Training Centre takes the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by employees in the performances of their duties and the third parties mentioned above.

Where IC Training Centre engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **HOW LONG DOES IC TRAINING CENTRE KEEP DATA?**

We may retain your personal information as long as necessary for funding and audit requirements once your association with us has come to an end.

### **INDIVIDUAL'S RIGHTS**

Individual's rights under GDPR are enhanced and extended in a number of important areas. As a data subject, you have a number of rights. You have a right to:

- Be informed about the collection and use of your data (privacy notices)
- Access and obtain a copy of your data on request (subject access)
- Request the correction/rectification of data where inaccuracies have been identified
- Request the erasure of personal data (often referred to as the 'right to be forgotten')
- Request the organisation to restrict processing your data, for example where the data is no longer necessary for the purposes of processing

- Request data portability
- Object to the processing of your data where IC Training Centre is relying on its legitimate interests as the legal ground for processing
- Not to be subjected to automated decision making & profiling

If you would like to exercise any of these rights, please contact Rupal Mehta on 020 3371 1041.

If you would like more information on your rights or you believe that IC Training Centre has not complied with your data protection rights you can complain to the Information Commissioner, website

[www.ico.org.uk](http://www.ico.org.uk)

### **WHAT IF YOU DO NOT PROVIDE PERSONAL DATA?**

IC Training Centre is required by the ESFA to provide student data on a monthly basis. Certain information, such as your personal and contact details, date of birth, NI Number, employment details, identification, evidence of benefits, right to work in the UK and payments details and evidence of prior attainment have to be provided to enable us to satisfy our contract with the ESFA and for you to be eligible for government funding. If you do not provide this information, this will hinder IC Training Centre's ability to administer the funding and your training may be subject to cancellation.

### **ESFA PRIVACY NOTICE**

#### **How the ESFA use your personal information.**

Personal information is collected by the ESFA in accordance with the terms and conditions of funding imposed on providers of learning, for example, further education colleges and private training organisations.

Your details will be kept in accordance with the General Data Protection Regulation (GDPR) 2016 and its principles.

This privacy notice is issued by the Education and Skills Funding Agency (ESFA), on behalf of the Secretary of State for the Department of Education (DfE). It is to inform learners how their personal information will be used by the DfE, the ESFA (an executive agency of the DfE) and any successor bodies to these organisations. For the purposes of relevant data protection legislation, the DfE is the data controller for personal data processed by the ESFA.

Your personal information is used by the DfE to exercise its functions and to meet its statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009 and to create and maintain a unique learner number (ULN) and a personal learning record (PLR).

### **REVIEW**

This policy will be reviewed on an annual basis or following changes to Government updates and statutory guidance in relation to Covid-19 and company risk assessment policies and processes.