



## Privacy and Data Protection Policy

Date	Document Version	Document Revision History	Document Author
August 2017	V1	Created	Nadine Hughes
October 2020	V1.2	Reviewed	Grace Shaw
October 2020	V1.3	Reviewed	Grace Shaw
January 2021	V2	Amended	Grace Shaw
January 2022	V3	Reviewed	Gary Petley

SR Apprenticeships ("SR Apprenticeships ", "we", "our" or "us") are committed to ensuring that your privacy is protected. This Privacy Policy describes how we use the personal information that we collect from you, or that you provide, when you:

- visit any of our websites or portals (the "Website");
- use the educational courses, testing, certification and products, and consultancy services (together the "Services") that we provide;
- or otherwise contact us.

SR Apprenticeships is fully committed to protecting the rights and privacy of individuals, in accordance with the European General Data Protection Regulation (GDPR) and Data protection Act (DPA) 2018. Information about our personnel, candidates and other individuals will only be processed in line with established regulations. Personal data will be collected, recorded and used fairly, stored safely and securely and not disclosed to any third party unlawfully. As the lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence, SR Apprenticeships is committed to:

- protecting candidates' personal details, records and assessment outcomes
- keeping candidates' and other individuals' personal data up to date and confidential
- maintaining personal data only for the time period required
- releasing personal data only to authorised individuals/parties and not unless permission is given to do so

- collecting accurate and relevant data only for specified lawful purposes
- adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of SR Apprenticeships are fully aware of and abide by their duties under the European General Data Protection Regulation (GDPR) and Data protection Act (DPA) 2018.

## Information We Collect

We collect personal information from you through the use of forms, which may be on paper or on our Websites, such as when you login to our ePortfolio system OneFile, signup to receive our newsletters, register for information, or commence a course of study.

If you are progressing your career through an SR Apprenticeships Apprenticeship, we may need to collect addition personal information to secure funding or satisfy statutory legal or Government scheme requirements.

We also collect personal information from you when you communicate with us for any reason, including by email, postal mail or telephone, and when you use our Services.

In addition, we collect certain information automatically about visitors to our Websites as described in section Use of Cookies.

We may record and store the telephone conversations you have to any of our offices for the purposes of quality control, staff training, and/or to prevent or detect crime.

If you choose to provide us with information you explicitly grant your consent to us using that information as is necessary to provide Services to you.

We are obliged to provide feedback to your employer if they have funded the course & request it, but we do not do this as a matter of course.

## Specific information for apprentices

If you are progressing your career through an SR Apprenticeships Apprenticeship we may need to collect addition personal information to secure funding or satisfy statutory legal or Government scheme requirements.

Some of the information you supply will be used by the Education and Skills Funding Agency (ESFA) to fulfil its statutory functions, issue/verify your Unique Learner Number (ULN) and update/check your Personal Learning Record. The ESFA may share your ULN and Personal Learning Record with other education related organisations, such as your careers service, school, college, university, Government Departments and public bodies responsible for funding your education.

Further details of how your information is processed and shared can be found at:

<https://www.gov.uk/government/publications/lrs-privacy-notice>

- Please note that you can opt-out of the ESFA sharing your Personal Learning Record. However, you can not opt-out of the ESFA storing your information.

- You can opt-out of sharing your participation and achievement data by contacting the Learning Records Service (LRS) Customer Helpdesk on 0845 602 2589. You will be required to provide some personal details to confirm your identity, which may include your Unique Learner Number (ULN), if known.

## How the LRS use your data

This statement is intended to provide you with information as to how The LRS will collect and use your personal information and data, and how you can exercise choice in respect of the use of your personal data.

The Learning Records Service is operated by the Education and Skills Funding Agency. The Learning Records Service collects data relating to learners registering for relevant post-14 qualifications, for example GCSEs, AS and A2 Qualifications, Diplomas and associated units, Apprenticeships, Entry to Employment Certificates and other vocational units.

The Learning Records Service offers a facility which stores learner participation and achievements. By providing your personal information, relevant organisations will have access to your Personal Learning Record to enable the use of your personal information to assess your achievements, awards and credits and to offer advice and guidance.

The Learning records service offers the following services:

- A Learner Register which allocates a Unique Learner Number (ULN) to each learner.
- A Personal Learning Records Service. The Personal Learning Records Service will offer you the facility to access your participation and achievement data from relevant data sources via the LRS website.

## LRS Collection of Data

The Learning Records Service collects data from:

- Information which is already being collected by other agencies from schools and other learning providers.
- Information you provide when you register with a learning provider.
- Qualification, unit and Rules of Combination data from Ofqual.
- Participation and achievement data from the National Pupil Database and Skills Funding Agency.

Learner achievement data supplied by Awarding Organisations directly into the Personal Learning Record.

## LRS Use of Data

The Unique Learner Number enables education and training sector organisations, and Awarding Organisations regulated by Ofqual, to share information about participation and achievements in a

consistent and approved manner, promoting good information management practice, and helping to improve accuracy and efficiency.

This will benefit you through enhancing the application processes to Awarding Organisations, learning providers, learning advisors and other third parties.

Your Personal Learning Record may be shared with organisations linked to your education and training. Any organisations that access information you provide are registered under the European General Data Protection Regulation (GDPR) and Data protection Act (DPA) 2018 and will use your personal information in accordance with the requirements of the Act. These organisations are required to sign relevant Data Sharing Agreements and control documentation which requires them to only access your information for specific purposes and to manage your data responsibly [and only to access information where there is a direct connection between you and their organisation].

### LRS Permissions for Sharing

Because the ULN is required for the administration of services within the education and training sector (such as the issuing of certain qualifications), you cannot opt-out of being issued with a ULN on the Learner Register.

You can opt-out of sharing your participation and achievement data through The Learning Records Service. Details of how you may opt-out of sharing your participation and achievement data within The Learning Records Service can be found [here](#), or by telephoning the Learning Records Service's Customer helpdesk on 0845 602 2589.

The Personal Learning Record also enables you to share, as much or as little, of your participation and achievement data held in the PLR with other third parties.

You can also share information with other organisations and individuals by creating a configured view of your participation and achievement data. The configured view allows you to create the view of your participation and achievement data and furthermore to share information with any third party that you wish.

One potential consequence of deciding not to allow data sharing of your participation and achievement data contained in the Learning Records Service will be that you may need to provide copies of certificates or other information to verify qualifications. You will also inhibit organisations that can support your continued education working with you, to perform on your behalf including the learner centric functions: Routes to Achievement, Rules of Combination queries and Credit Transfer functions.

### LRS Correcting Inaccurate Data

A major benefit of The Learning Records Service is that you can check that information held about you is accurate and request that any errors are corrected. If you believe that any information on your Personal Learning Record is incorrect then you should follow the data challenge procedure found on the LRS website.

### LRS Sensitive Personal Data

The Learning Records Service makes every effort not to collect any information which consists of sensitive personal data (for example data which relates to ethnic origin, physical or mental

health, religious beliefs, trade union membership or any criminal offences or proceedings).

If you find that any sensitive personal data has inadvertently been included, you should contact the Agency through the service desk. The Learning Records Service currently employs a process of sensitive personal data identification and removal.

## LRS Sensitive Learners

The Learning Records Service recognises that some learners have specific concerns about privacy which mean that additional safeguards are required. The Learning Records Service implements a Sensitive Learners Policy to ensure these safeguards are implemented.

## LRS Security

The Learning Records Service recognises the need to keep your information secure and has implemented a Security Policy that provides the appropriate technical and organisational measures aimed at preventing loss of, or unauthorised use of, your information in accordance with Government

## How long will the LRS keep your Data?

The Learning Records Service is intended to provide a life-long record of learning which will be available to you at any time you choose to participate in education or training. Therefore, the Learning Records Service may continue to hold your ULN, Personal Learning Record and Qualification Credit Framework and associated data for 66 years and will be reviewed periodically.

## LRS Updates to this policy

The Learning Records Service recognises that privacy and data protection concerns can evolve over time and will keep this policy under review. Any amendments will be posted here and will be notified to learners when they access their Personal Learning Record.

## Use of Cookies

SR Apprenticeships website uses cookies to provide easier navigation around the sites and gather anonymous analytics information. In some cases, cookies are used to provide functionality within sessions, such as within OneFile.

We use Google analytics within our websites to monitor how visitors move around the website and how they reached it. This is done so that we can see total (not individual) statistics on which types of content users access most frequently. The Google cookies also tell us if you have visited the site before and allow us to track how many individual users the websites have. The Google cookies cannot be used to identify individuals - they are only used for statistical purposes only. You can opt out of Google cookies here <https://tools.google.com/dlpage/gaoptout>

From time to time we may have links to other services such as Social media or video services on our sites. These services may drop cookies on your computer when you use them, especially if you are already logged into their service. Due to the nature of how cookies work, SR Apprenticeships

cannot access these cookies nor control their use. Likewise, these 3<sup>rd</sup> party services cannot access SR Apprenticeships.

You have the right to choose whether or not to accept cookies and to set your own cookie preferences on your computer.

These preferences can be to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at all. However, by opting not to receive cookies at any time, certain features of the Website cannot be provided, and you may not be able to enjoy the Website to its fullest. All web browsers are different and to learn how to change your cookie preferences, check the "Help" menu of your browser.

Users can block most cookies (except for Flash cookies) by activating the setting on their browser that allows users to refuse the setting of all or some cookies. However, if the browser settings to block all cookies (including essential cookies) users may not be able to access all or parts of the website, or users may experience reduced functionality or unexpected operations when accessing certain services.

Unless the user's browser has been configured so that it will refuse cookies, our websites notify the user that the site makes use of cookies and allows the user to customise their browser to configure their preferences.

Most internet browsers accept cookies automatically, but you can change the settings of your browser to erase cookies or prevent automatic acceptance if you prefer. These settings will typically be found in the 'options' or 'preferences' menu of your browser.

## Use of Your Information

The information that we collect and store relating to you is primarily used to enable us to provide our Services to you. In addition, we may use the information for the following purposes:

- To provide you with information you request from us.
- To administer the account you create or use on our Websites;
- To respond to your correspondence, so that we can reply to your enquiries and requests in an efficient and effective manner;
- To provide information on other SR Apprenticeships products and Services which we feel may be of interest to you, in accordance with your communications preferences;
- To meet our contractual commitments to you;
- To act on your behalf where third party funding is available and appropriate;
- To notify you about any changes to the Websites or our Services, such as improvements or changes that may affect either;
- Where your telephone conversations with us have been recorded, these recordings will be retained for a maximum of 30 days and will only be used for training and quality purposes and/or to prevent or detect crime; and
- As necessary to prevent or detect crime.

If you do not want us to use your data for any marketing purposes you will have the opportunity to withhold your consent to this when you provide your details to us.

## Storing Your Personal Data

The personal information you provided to us is stored within secure servers.

Please note that the transmission of information via the internet (including email) is not completely secure and therefore, although we endeavour to protect the personal information you provide to us, we cannot guarantee the security of data sent to us electronically and the transmission of such data is therefore entirely at your own risk.

Where we have given you (or where you have chosen) a password so that you can access our ePortfolio system OneFile you are responsible for keeping these passwords confidential.

## Disclosing Your Information

We are obliged to provide feedback to your employer if they have funded the course & request it, but we do not do this as a matter of course.

We may also disclose your personal information to:

- Any third party we contract to act on our behalf;
- Where third party funding is required within Apprenticeships or further/higher education.
- Your employer, where required within an Apprenticeship program.
- Government agencies, where required by the scheme or education path you elect to follow.
- Partners with whom we work to provide Services;
  
- Any third party that purchases all or substantially all of our assets and business; and to
  
- Any law enforcement agency, court, regulator, government authority or other third party where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.

## Third Party Links

You might find links to third party websites on our Websites or within documentation we provide.

If you access other websites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their own privacy policies which you should review.

We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

## Social Networking

The Website may offer you the opportunity to share or follow information about us (or the Website or our Services) using third party social networking functionality (such as through "share this", "like" or "follow" buttons).

We offer this functionality in order to generate interest in us, the Website and our Services



among the members of your social networks, and to permit you to share and follow opinions, news and recommendations about us with your friends. However, you should be aware that sharing personal or non-personal information with a social network may result in that information being collected by the social network provider or result in that information being made publicly-available, including through Internet search engines.

Please note that we do not exercise any endorse or control the policies or practices of any third party social network whose functionality you may access through the Website.

You should always read the privacy policy of any social network through which you share information carefully in order to understand their specific privacy and information usage practices.

## Internet-based Transfers

Given that the Internet is a global environment, using the Internet to collect and process personal information may involve the transmission of personal information on an international basis. Therefore, by browsing our Websites and communicating electronically with us, you acknowledge our processing of personal information in this way. However, we will endeavour to protect all personal information collected through the Websites in accordance with strict data protection standards.

## Access to Information

Should you wish to access or update the personal information that we hold about you, please contact us using the contact details below. If you have an account on OneFile you may also access and update your personal information by logging onto your account.

## How Can You Contact us About This Privacy Policy

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact our Data Protection Officer (DPO), Gary Petley, by email at [enquiries@sr-apprenticeships.co.uk](mailto:enquiries@sr-apprenticeships.co.uk), by phone at 01949 20976, or by post at:

32 Mile End Road  
Colwick  
NG4 2DW

There is also a Contact us form available at [www.sr-apprenticeships.co.uk](http://www.sr-apprenticeships.co.uk).

## Your Consent

By using our Websites or agreeing to do business with us, you consent to the collection and use of information as outlined in within this document.

## Changes to the Privacy Policy

We may change this Privacy Policy from time to time by updating this document.

You should check this page from time to time to ensure that you are happy with any changes.

If you do not agree to the changes we make, please do not continue to use our Websites or

our Services. If material changes are made to this Privacy Policy, we will notify you by placing a prominent notice on the Website.