

## Privacy and Data Policy

### Our commitment to privacy

This Privacy and Data Policy describes what SR Apprenticeships do with the personal information you provide. Both the DfE Privacy notice for Key Stage 5 and adult education and the SR Apprenticeships Privacy and Data Policy apply to information collected by SR Apprenticeships via the [www.sr-apprenticeships.co.uk](http://www.sr-apprenticeships.co.uk) website and in any manner described in the SR Apprenticeships Privacy and Data Policy.

SR Apprenticeships, a private training organisation is, for the purposes of the General Data Protection Act May 2018, registered as a data controller for personal data and other third parties contracted to process data for the Education Skills Funding Agency (ESFA) and Department for Education (DfE). SR Apprenticeships' Data Protection registration can be viewed on the [Information Commissioner's website](#).

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

- visit website or learning 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 General Data Protection Act 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 GDPR act 2018.

Our Data Protection Officer can be contacted via email at [data@sr-apprenticeships.co.uk](mailto:data@sr-apprenticeships.co.uk) or by phone at 01949 20976.

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### **If you reject the terms of this Privacy and Data Policy**

If you do not agree to your personal data being used in accordance with this privacy and data policy, please do not submit your personal data to us through the website, forms or any other means.

### **Third-party links and products**

The Website may include links to third-party websites, plug-ins and forms. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

Through the course of your programme you may also be directed to use third party platforms (for example: Onefile, Skillsforward, Microsoft Teams). We do not control these third-party platforms and are not responsible for their privacy policies or responsible for personal data which may be transferred by you to such third parties. When using these platforms, we encourage you to read their terms of use and privacy policy.

### **Giving information for other people**

When you give us information about another person, the other person must have agreed to let:

- us process all their personal data; and
- you receive any data protection notices for them.

When you send information for someone else, you are confirming that you have told them:

- which data they must give;
- which information is voluntary; and
- how they can access and, if necessary, correct the data we hold about them.

### **The information we collect during the enrolment process with SR Apprenticeships**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

When you enrol with us, you (or the person enrolling you) must tell us:

- your full name;

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- your date of birth;
- your address (and correspondence address if different);
- primary telephone number;
- next of kin data;
- your employment status;
- email address;
- your education so far;
- your citizenship status; and
- where you live and how long you have lived there.

We use this information to check whether you are eligible for funding. If you are not eligible this information will be destroyed.

We also request other information including your title, middle name, email address, National Insurance number, gender, ethnicity, additional social/learning needs or disability. These details are collected for diversity monitoring purposes and/or on behalf of the Education and Skills Funding Agency (ESFA), this information is voluntary. Following enrolment via the website, we, or our approved service providers, may request additional personal data from you in order to further support your learning. You do not have to provide this information, but if you do not, you may not get the most out of your learning. However, we ask you to tell us whether you have achieved Level 2 in English and Maths.

We will call you at the time of your choice to check all the above details with you and may request additional information, such as if you have done any learning in the last three years, other information we may collect is set out in this Privacy and Data Policy. You will need a user name and password to access your virtual learning environment (VLE) and materials. Your username is your email address and you can either choose your own password or we will give you one which you must change when you first log in.

Please note that when you enrol on a SR Apprenticeships course that leads to a qualification such as a Professional qualification or NVQ, we send non-sensitive personal information to the relevant awarding bodies so that they can undertake the administration associated with your qualification.

### **Other information we collect, to see if you can have government funding**

If government funding is available for any of our courses, you need to answer some other questions to see if you are eligible for funding. If you wish to take advantage of any such funding, you will be asked about:

- your age;
- your education so far;
- your citizenship status; and
- where you live and how long you have lived there.

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We may require additional information from you in order to support an application for funding. If you do not want to provide us with this information, we will not be able to support you on your apprenticeship/traineeship.

### **Learner File**

When you start your learning a learner file is created to hold documents relevant to your learning and evidence of proof of identity and funding eligibility. As you progress through your learning other documents, including some of your evidence/off the job training log/course work, may be held in this file.

### **The information we collect when you access course materials**

We collect information about how you use course materials to monitor your learning and improve our users' learning experience within the VLE (Virtual Learning Environment).

### **Other information we collect**

If you require further information or support (request a call back) we ask you to provide us with the information on the "request more information" form on the website, including:

- Full name;
- Email address;
- Contact number;
- An indication of courses in which you are interested
- You can also decide to give us your home and mobile telephone numbers and your email address but you only need to do this if you want us and/or our approved service providers to contact you about SR Apprenticeships developments and offers in this way.

You may also provide personal data through:

- calls to our helplines;
  - letters and email;
  - customer feedback forms;
  - other learning or communications facility offered by us;
- \*In general, if you contact us, we may keep a record of your query or complaint for a reasonable time in case you contact us again.

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### **Sensitive personal data**

Sensitive personal data includes details of your:

- race or ethnic origin
- political opinions
- religious or other beliefs
- additional learning or social needs

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- physical or mental health

At or before enrolment you may be asked for sensitive personal information but you do not have to provide it. If you decide to provide sensitive personal data, we will use it for the purposes described in the section below. If you do not want to provide it, or do not want us to use it for these purposes then when enrolling online please select the “prefer not to say” option.

You may also volunteer sensitive personal data to us, for example, when you submit a query or comment to us via the website or some other means of communication. If you do so, you explicitly consent to our using such information as described in this Privacy and Data Policy.

### 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.
- To carry out administration;
- To improve the quality of services;
- To support your application for government funding;
- To obtain customer feedback;
- For general statistics and research;
- For obtaining any relevant professional advice;
- As may be required by law or in connection with legal proceedings (including where we intend to take legal proceedings), or as may be necessary to establish, exercise or defend our legal rights.

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.

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### Third parties and sponsors

To achieve the purposes set out in this Privacy and Data Policy we may need to share your information and Learner File with our service providers (including our approved learning providers), professional advisors and auditors and to your tutor assessor(s). When you enrol on a course with a service provider, the service provider will be delivering and supporting your learning. Following enrolment via a centre or online, all of our approved service providers will have access to your name, date of birth, address, username, learner reference number and which SR Apprenticeships courses you have enrolled on in the past as well as details relating to these SR Apprenticeships courses to help us deliver our services to you. In a limited number of circumstances, it may be necessary to allow a new Service.

Provider access to all your personal information for example if your existing Service Provider no longer provides SR Apprenticeships services.

We may also give your information to third parties who may take over part or all of the SR Apprenticeships business in the future, but only for the purposes outlined in this Privacy and Data Policy. If your employer, trade organisation or other organisation is sponsoring or supporting you, we may give the personal information we have collected to your sponsor to monitor your learning.

Communications between you and your tutor using any of the tools or functions we make available to you (including unopened messages sent via our virtual learning environment messaging system) may be monitored by SR Apprenticeships staff to check the quality of tutor support. SR Apprenticeships staff and auditors may also access these communications when we want to investigate or audit learner funding arrangements.

### Referral Partners

If we have received your details as a referral from one of our partners, we may be required by the referral partner to provide them with updates on the following areas:

- Attendance
- Progress
- Achievement/completion
- Outcome/destination
- Withdrawal

### Keeping you informed

We, and our approved service providers, will use your information to send you regular updates about:

- our services and materials;
- additions to the website; and
- specific activities such as customer feedback surveys and competitions.

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If you enrol on a SR Apprenticeships course you will periodically be sent customer feedback surveys. If you do not wish to be contacted for marketing purposes please do not select opt in. If at any time, you change your mind about receiving updates, you can advise your Tutor Assessor or email [data@sr-apprenticeships.co.uk](mailto:data@sr-apprenticeships.co.uk).

We will never use your sensitive personal data for marketing purposes without your express consent.

### **Funding**

We, and our approved service providers, may use your personal data to process or to support any application made for funding associated with your learning. For these purposes we, or our approved service providers, will share the information you supply with the Education & Skills Funding Agency in England and Department for Education (DfE). The Education & Skills Funding Agency may in turn share it with the European Social Fund, or other government agencies that may provide funding for your course.

Learner data is collected by SR Apprenticeships in accordance with the terms and conditions of funding imposed on providers of learning, for example, Further Education colleges and private training organisations. The data collected from learners is processed by SR Apprenticeships, as explained in the Privacy Notice issued by providers to each learner.

The data is primarily used by the ESFA and the DfE to perform statutory functions on behalf of the Secretary of State as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and for the exercise of functions of the Crown, a Minister of the Crown or that government department.

Information provided by learners may be shared with other organisations for purposes of administration, the provision of career and other guidance and statistical and research purposes, relating to education, training, employment and well-being. Other organisations include the Department for Work and Pensions, Local and Combined Authorities in England, the Greater London Authority, the Higher Education Statistics Agency, the Higher Education Funding Council for England, educational institutions and organisations performing research and statistical work on behalf of the Department for Education, or partners of those organisations

The learner data processed by SR Apprenticeships is known as the Individualised Learner Record (ILR). The specification and standards for the ILR are published for each academic year (1 August – 31 July) by the ESFA.

Learner data is also collected and supplied to the Learning Records Service, a part of the ESFA. This personal data is used by the ESFA to issue learners with a Unique Learner Number (ULN), and to create and maintain the Personal Learning Record. Information held in the Personal Learning Record is shared with third parties such as providers of learning.

Further details of how this personal data is processed for these purposes are published for the Learning Records Service.

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At the point this information is collected you will be asked to indicate if you wish to be contacted by the Education and Skills Funding Agency (ESFA) or its partners in respect of courses, surveys and research. You can change your choices at any time by talking to your tutor. Please read the DfE Privacy Notice below.

We, or the government agency providing funding for your course, may use your personal data and Learner File to investigate a suspected misuse of public monies or other fraudulent activity by any person relating to your learning activity. In doing so, we, or the government agency providing funding for your course, may disclose your information to other government agencies (e.g [Department for Work and Pensions](#)) to establish whether there has been any duplication of funding for your course. We may also contact you for the purposes of any such investigation.

### **Privacy Notice for Key Stage 5 and adult education**

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 the Data Protection Act 1998, the DfE is the data controller for personal data processed by the ESFA.

### **How We Use Your Personal Information**

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).

Your information may be shared with third parties for education, training, employment and well-being related purposes, including for research. This will only take place where the law allows it and the sharing is in compliance with the Data Protection Act 1998.

The English European Social Fund (ESF) Managing Authority (or agents acting on its behalf) may contact you in order for them to carry out research and evaluation to inform the effectiveness of training.

You can opt out from being contacted for other purposes by choosing a relevant option in the ESFA Contact Restriction fields which will be discussed with you when you register with SR Apprenticeships.

Further information about use of and access to your personal data, and details of organisations with whom we regularly share data are available at:

[Privacy notice for Key Stage 5 and adult education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

### **The VLE and Online Sessions**

SR Apprenticeships provides delivery through a Virtual Learning Environment (VLE) and other supporting online delivery methods (i.e. web conferencing tools). These platforms are also accessed



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by SR Apprenticeships staff in order to provide support and deliver training to learners. Within the platforms the following data sharing is in operation:

- Your name, log-in data and course or programme may be shared with other users of the platform
- The above details will be searchable to other platform users, and you can be messaged through the platforms by other users based on your platform user name
- You may also elect to share your photo,
- Your participation in online sessions (such as webinars, online teaching, forums or chatrooms), including your text, audio or video content may be recorded and shared
- Any assignment or assessment uploaded or completed through the platforms will be shared with the appropriate staff for the purposes of assessment. Assignments/assessments may be sent to third parties for the purpose of ensuring the work is original, attributes sources correctly and does not infringe on any existing copyright
- Platform data relevant to assessing your progress within the course or programme may also be shared with your employer, third-party tuition provider or quality assurance.

### Online Learning

Learners should be aware that, whilst taking part in online learning sessions your skills coach, tutor and other learners in the session will be able to see you (if you enable video), hear you (if you enable your microphone) and see any text that you have typed into the chat box. Although it is optional to have these features enabled, some skills coaches/tutors may request that these are enabled to improve the experience of all learners (to make it more like traditional classroom learning); or to ensure you are able and actively participating in the session (including any group work).

You should also be aware that online sessions may be recorded and shared via the VLE as a revision aid or to enable learners who have missed the session are able to catch up. In addition, some recorded sessions may be shared within SR Apprenticeships for training and monitoring purposes, including (where applicable) with specific regulators in the field of education as part of their monitoring/audit functions.

### Statistics

We and/or the approved service providers delivering and supporting your learning are also required to provide statistics to all of the government agencies mentioned under the heading 'Funding' and to the [Department for Business, Innovation and Skills](#), in order that they can carry out checks on our funding arrangements and our performance and for research and statistical purposes. This helps us, and our approved service providers, to maintain our funding. Where such information is supplied, it is provided in an aggregated manner so that whilst such authorities may be aware of, for example, the number, geographic location and sex of persons using SR Apprenticeships, you cannot be personally identified from this information.

However, we may provide information that identifies you (your name, date of birth, address and postcode) to the Department of Work and Pensions so that they can check whether SR Apprenticeships learners have progressed into employment and compile statistical information about such progression. You will not be identifiable from the statistical information compiled.

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### Requests for information

If you have not registered as a learner but are simply making an enquiry or request for information, we will use your personal information to reply to your enquiry or request. We will not use this information for marketing purposes without your permission or unless you invite us to do so.

### Protecting your personal information

SR Apprenticeships, a private training organisation is, for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation (the GDPR) from May 2018, registered as a data controller for personal data and other third parties contracted to process data for the Education Skills Funding Agency (ESFA). SR Apprenticeships' Data Protection registration can be viewed on the [Information Commissioner's website](#). As a registered data controller, we are required to take appropriate technical measures to protect your personal information including making a regular backup of our system and data. We have security measures in place to make sure any personal information we collect is secure. Your account is password protected and all information including your password is on a secure server, which only a limited number of employees can access. All parties with access to your information are subject to confidentiality obligations. If you think someone else knows your password, or is using it, tell us immediately and change your password using the "change my password" option.

To prevent unauthorised disclosure or access to information, it has strong organisational and technical security safeguards. If information is shared with another organisation (reasons for this are given below) it will ensure an Information Sharing Agreement is in place. SRE follows stringent procedures to ensure it works with all personal data in line with the General Data Protection Regulation 2018.

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.

### Access to Systems and Data Outside the UK

- Employees are required to access company systems and data only from within the UK unless prior written approval has been obtained from Data protection officer.
- Access to systems or data from outside the UK is strictly prohibited unless:
  - Approval has been sought from the Data Protection Officer (data@sr)
  - The destination country has been deemed to provide an adequate level of data protection under GDPR.
  - Appropriate safeguards (e.g., Standard Contractual Clauses, Binding Corporate Rules) are in place.
  - A secure connection is used (e.g., a company-issued VPN).

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### Prohibited Actions

- Accessing company systems or data from unauthorised devices.
- Accessing company systems from locations outside the UK.
- Using non-approved software, hardware, or networks to access sensitive information.
- Failing to report intentions to work outside the UK or unauthorised access to systems.

### Authorisation Process

- Any employee planning to work outside the UK must:
  1. Submit a formal request to their line manager and the Data Protection Officer at least 20 working days in advance.
  2. Detail the location, reason, and duration of external access.
  3. Await written confirmation of approval.

### Monitoring and Audits

- All system access is monitored for compliance.
- Unauthorised access may result in disciplinary action, up to and including dismissal, and may be reported to regulatory authorities where required.

### Breach Reporting

- Any suspected or actual breach of this policy must be reported immediately to the Data Protection Officer.
- Failure to report a breach may result in further disciplinary measures.

### Disciplinary Measures

Non-compliance with this policy will be treated as a serious breach of employment terms and may lead to:

- Revocation of system access.
- Disciplinary action in line with the company's procedures.
- Legal and regulatory consequences as applicable.

### Keeping your personal data

We keep personal data and Learner Files:

- for as long as is necessary to fulfil the purposes we collected it for;
- as required by law; or
- to enforce or defend legal claims.

Sometimes we will keep information that you have deleted, for example messages sent by you to your tutor, as a record of your learning experience. We will keep this information for a reasonable time.

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We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

### **Our policy for children**

Our website is not designed for or directed at children under the age of 13. SR Apprenticeships does not knowingly solicit personal information from children under the age of 13 or send them requests for personal information.

We recommend that you put parental controls on your internet browser and supervise your children when they are online.

We will not use information collected from people under 16 for marketing purposes. In general, Government funding is not available to learners under 16 via SR Apprenticeships, although there are some specific exceptions, in particular apprenticeships. This Privacy and Data Policy will apply to any learner enrolled on an apprenticeship even if you are aged between 16 and 18

### **If you are a tutor**

When you are registered as a tutor by a Service Provider you accept that all activity is undertaken by you for the provision of SR Apprenticeships learning. Any comments or tutor notes placed by you or the SR Apprenticeships system will be retained, are visible to the relevant learner and authorised personnel within SR Apprenticeships Ltd and may be used as evidence of learner support.

### **Your rights**

You have the right to:

- ask for a copy of all the information we hold about you and to correct any inaccuracies. To obtain a [Subject Access Request Form](#), please ring us on 0194920976 or email [data@sr-apprenticeships.co.uk](mailto:data@sr-apprenticeships.co.uk)
- challenge the accuracy of data held about you, please ring us on 0194920976 or email [data@sr-apprenticeships.co.uk](mailto:data@sr-apprenticeships.co.uk) request a change
- take steps to prevent your personal data being processed if the processing is likely to cause you substantial damage or substantial distress which is unjustified. If you want to exercise this right you must put your objection in writing by emailing [data@sr-apprenticeships.co.uk](mailto:data@sr-apprenticeships.co.uk) specifying why the processing has this effect and state what you require SR Apprenticeships to do to avoid causing damage or distress.

If you wish to make a data protection complaint go to: <https://ico.org.uk/concerns>

### **Links**

The SR Apprenticeships website may contain links to other websites. Please note that SR Apprenticeships have no control of websites outside of [www.sr-apprenticeships.co.uk](http://www.sr-apprenticeships.co.uk) If an individual provides information to a website to which SR Apprenticeships links, it is not responsible



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for its protection and privacy. Individuals are advised to read the privacy policy or statement of other websites prior to using them.

### **Other information**

You should note that if our business (or any part of it) is sold or transferred at any time, the information we hold may form part of the assets transferred although will still only be used in accordance with this Privacy and Data Policy.