



# Privacy Notice

## Introduction

ALS Training is committed to protecting and respecting your privacy and we comply with the Data Protection Act 2018 and General Data Protection Regulation 2016 (GDPR).

This privacy notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The following rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR")

## Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data'. The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions and religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means,

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.



## How we use the data we collect from you

We process the personal data that you provide us in order to deliver the funded learning programme that you are about to enrol on. Taking part in this funded training programme is dependent on you providing personal data. ALS Training will be the data processor for the personal data you provide to us.

The data you provide us with will be used by the Welsh Government (data controller) to carry out its public duty to administer and monitor the use of its funds. We may also use the personal data you provide us in the following ways;

- To support your learning
- To monitor and report on your progress
- To assess and report on the quality of our services
- To provide appropriate pastoral care and safeguarding
- To comply with the law and any legal obligations that we may be subject to

With reference to the categories of personal data described in the definitions section, we process the following categories of your data

- Name
- Date of Birth
- Address
- Postcode
- National insurance number
- Telephone number
- E-mail Address
- Bank details (programme specific)
- Gender
- Surname at 16
- National identity
- The last school you attended
- The year you left school
- Whether you are a migrant worker
- Learning difficulty or disability indicator
- A unique learner identifier (created by the Welsh Government)
- A learner Identifier number (created by your learning provider)
- A unique learner number (created by the Learning Records Service)
- Emergency contact information.

Additionally there is data about you which is defined as **special category data**. Providing this data is optional and will include;

- Ethnicity
- Disability type
- Health condition



In addition to this if your programme is ESF funded, you will be asked to supply additional evidence such as a passport, recent payslip or qualification certificate. A copy of this evidence will be retained by ALS Training for ESF audit purposes, a sample will be sent to Welsh Government.

We will not share information about you with third parties without your consent unless the law allows or requires us to. We may be required to share some of your personal data with:

- Welsh Government
- Estyn
- Awarding bodies
- Local Authorities
- Working Wales (Formerly Careers Wales)
- Healthcare professionals

We may also share your information for legal reasons if we believe in good faith that access, use, preservation or disclosure of the information is necessary to:

- Meet requests from government bodies, law enforcement agencies in relation to any investigation to aid with the detection, prevention of any unlawful activity
- Detect or prevent fraud, security or technical issues
- Assist other third parties in legal proceedings

The lawful basis for us processing your data under the general data protection regulations falls under the following;

- Processing is necessary in the public interests
- Processing is necessary for the performance of a contract

We keep your personal data for no longer than reasonably necessary for the fulfilment of our contractual requirements with Welsh Government and awarding bodies.

For further information the link to the Welsh Governments Lifelong Learning Wales Record Privacy Notice (2019) V3.0 is below

<https://gov.wales/lifelong-learning-wales-record-privacy-notice-2019>

## **Retention periods**

Work based learning - your data will be deleted 10 years after the end of the contract period

Awarding body (qualification data) your data will be deleted after a period of six years from the end of your learning programme unless timescales specified differ as to awarding body and professional body requirements (links to awarding bodies websites below for further information)



## Your rights and your personal data

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased (in certain circumstances);
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics.
- Lodge a complaint with the Information Commissioner's office (ICO) who is the independent regulator for data protection

## Awarding Bodies

You can use the links below to find out more about how awarding bodies manage and use your data when you are enrolled on a programme with them;

Agored Cymru - <http://www.agored.cymru/Learners/Privacy-Statement>

ACW - <http://fiss.org/quality-assurance/data-use-and-management-policy/>

ILM - <https://www.i-l-m.com/privacy/learnerpersonaldata>

City and Guilds - <https://www.cityandguilds.com/help/privacy-statement>

Pearson – <https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy.html>

Cache (Council for Awards in Care, Health and Education) - <https://www.cache.org.uk/notices/privacy-notice/>

AAT = <https://www.aat.org.uk/get-myaat/privacy-policy>

IMI - <https://www.theimi.org.uk/agenda/privacy-policy>

EAL - <http://eal.org.uk/privacy-policy>

Highfields – <https://www.highfieldproducts.com/company/privacy.php>

CII – <https://www.cii.co.uk/about-us/data-protection-and-privacy-statement/>



## **Further processing**

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on the company's website. Please check frequently to see any updates or changes to our privacy policy

## **How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our company's Data Protection Officer. Use the contact information provided below

Data Controller  
ALS Training Ltd  
Ocean Park House  
East Tyndall Street  
Cardiff  
CF24 5ET  
029 22677020  
[info@alstraining.org.uk](mailto:info@alstraining.org.uk)

To contact the Information Commissioner's Office, please see details below:

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
029 2067 8400 (Wales helpline) or 0303 123 1113 (UK helpline <https://ico.org.uk>)