

Privacy Policy

Rob Horswell Training is committed to respecting your privacy in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act (2018), we have implemented this privacy notice to inform you, as clients of our company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

We will never sell your data. We may share personal data with other organisations who we work with to provide the service to you. However, these activities will be carried out under contracts which have strict requirements to keep your information confidential and secure.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles.

In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data about you in order to deliver our services to you as a student, manage our operations effectively and meet certain legal requirements. We keep this data in hard-copy files and we also hold the data within our computer systems, for example, Course Application Forms.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers;
- b) name and contact details of your next of kin;
- c) date of birth;
- d) your gender, information of any disability you have or other medical information;
- e) information on your race and religion for equality monitoring purposes;
- f) details on your education and employment history etc;
- g) driving licence or form of photographic identification.

C) COLLECTING YOUR DATA

We collect personal information about our students and where applicable, their sponsors and parents in order to provide the courses, individual support and ensure that your course is accredited/endorsed by the appropriate bodies.

We may collect the following information:

- Name
- Contact information including email address

- Demographic information such as postcode, preferences and interests
- Other information relevant to customer surveys and/or offers

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carrying out checks in relation to your identity	Our legitimate interests
Registering you with Awarding Organisations and Membership Bodies	Our legitimate interests
Making reasonable adjustments for disabled students	Legal obligation
Assessing any additional support needs	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We carry out processing activities using special category data:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our operational requirements for you as a student. This could include being unable to enrol, assess or certify your qualification.

G) WHO WE SHARE YOUR DATA WITH

Employees and workers within our company who have responsibility for students will have access to your data which is relevant to their function. All Employees and workers with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

- To register with Awarding Organisation or Membership Body
- To seek Unique Learner Number
- To record your information with the Education & Skills Funding Agency

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data. We do not share your data with bodies outside of the European Economic Area.

H) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

I) RETENTION PERIODS

We only keep your data for as long as we need it for, which, depending on the function, will vary as detailed below.

Record	Purpose	Retention Period
Student Record	Administrative records, including registration/enrolment onto programmes, scanned portfolios of work, transfer to new programmes/courses, withdrawal/suspension, satisfaction surveys, student letters, complaints, progress, support, health declarations, student references and personal data.	End of relationship with Rob Horswell Training + 6 years
Student Core Record	A full permanent record of a student's name, period of study and final achievements. A full record of course units taken and the marks for these for the purposes of providing confirmation and letter of confirmations.	Permanent
Delivery of Training -Exam records	Examination papers and answer sheets	Current academic year + 1 year
Delivery of Training -Student Portfolios	Student portfolios (Hard-copy)	Returned on completion/withdrawal
Payment Plans (Card details)	Payments are set up through external companies, therefore we do not ever have client's card details.	N/A

J) YOUR RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so. If you wish to exercise any of the rights explained above, please contact the Company Director.

K) COOKIES AND LINKS TO OTHER SITES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites, but please let us know if a link is not working by contacting the Company Director - rob@robhorswelltraining.co.uk. If an external website requests personal information from you, the information you provide will not be covered by the Rob Horswell Training's privacy policy. We suggest you read the privacy policy of any website before providing any personal information. When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Rob Horswell Training.

L) DIRECT MARKETING

You have the opportunity to opt in to direct marketing from Rob Horswell Training when you submit your data to us. If you opt in, we may use the information you provide to contact you with information and promotional material regarding our services by telephone or email. By opting in to direct marketing, you are consenting to its use in this way. You can opt out at any time by contacting us by phone, email or in writing.

M) POLICY AMENDMENTS

We may update this privacy policy from time to time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Robert Horswell

Company Director

rob@robhorswelltraining.co.uk