

Learner Privacy Notice

How We Use Your Personal Information

Focus Training (SW) Ltd is committed to data security and the fair and transparent processing of personal data.

This privacy notice describes how we collect and use personal information about you during and after your training with us, in accordance with the General Data Protection Regulation (GDPR).

Focus Training (SW) Ltd is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

We have appointed a manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the HR Manager. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

What information do we collect from you

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).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Household Situation.
- Nationality/Place of Birth.
- Next of kin and emergency contact information.
- National Insurance number.
- Start date.
- Current and previous employment information.

- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Performance information.
- Prior education information.
- ULN/PLR.
- CCTV footage from the centre training rooms.
- Photographs.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity.
- Information about your health, including any medical condition, health and sickness records and learning difficulties.

Data Sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

Your information will be shared with the ESFA where funding is obtained for training. For further information please refer to the ESFA Appendix F Privacy Notice.

Your information will also be shared with the relevant awarding bodies for the sole purpose of learning, assessment and certification. Each awarding body will have their own Privacy Notice on how they handle your data.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

How long do we keep hold of your information

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Where do we store your personal data and how is it protected

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Rights of Access, Correction, Erasure, and Restriction

Your Duty to Inform Us of Changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your Rights in Connection with Personal Information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below). If you are undertaking an apprenticeship with us then we have a legal obligation to collect your data and the right to erasure no longer applies.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Right to withdraw consent** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the HR Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you have any queries about this policy, the way in which Focus Training (SW) Ltd processes personal data, or about exercising any of your rights, you can contact our Privacy Representative by contacting the HR Manager on 01752 348980 or writing to the HR Manager, Focus Training (SW) Ltd, Suite B, Valley Road, Plymouth, PL7 1RF.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

Changes to our Policy

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.