



Data Protection Privacy Policy

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Document History			
Version	Issue Date	Owner	Revision Notes
V1	16.01.19	Rosie Ross	Full Review
V1.1	10.02.20	Wendy Shepherd	Full Review
V1.2	17.10.21	Wendy Shepherd	Reviewed and Rebranded

This document is issued, controlled, and can only be modified after proposed modifications have been accepted by the Operations Director and have been accepted by the Company Directors.

The latest version will be maintained on the company central storage area (Intranet).

GDPR (General Data Protection Regulations 2018)

This policy explains how Key Training Group will protect your rights and your personal information and explain ours and your responsibilities within this.

By reading this Privacy Policy it is taken that you have understood and will adhere to its contents. You have been given this policy because Key Training Group collects, uses and stores information about employees, companies and individuals it works with in providing training and apprenticeships. This means that we process your personal data or information, and it is your right to know how we use this information, whether it is stored on computers or stored in paper records.

Key Training Group is committed to ensuring that your privacy is protected and that the information held by us is secure to prevent unauthorised access or disclosure we have put in place physical, electronic and managerial procedures to safeguard and secure the information we collect from you, including your online details.

CONSENT

Within this privacy policy we will detail the personal information that is mandated for us to collect. For this we have a legal obligation to hold the data and therefore, by default by enrolling onto any government funded programme (individuals) or by accessing funding from the government for programmes (companies) or being an employee of the organisation.

What can you ask us for?

As an individual engaged with Key Training Group, whether as an individual, company or employee, you can ask us:

- How we use your information
- Who we pass it to
- For a copy of the information we hold on you
- To correct it if the information is wrong
- To erase information, we hold on you (subject to legal retention requirements)

As an organisation we will:

- Not allow the information to be used or seen by anyone who should not see it
- Give you a copy of your personal information if you ask for it within 40 days of verifying your request

Individuals

Why do we collect personal information about you?

We collect information to allow us to carry out the work of Key Training Group delivering commercial training, work related training and apprenticeships within our Centres, in employers' premises and through our dedicated learning website and online portfolio.

We are required to collect this information by the Education & Skills Funding Agency, Department for Education, and other funding bodies, to deliver our services to the required standards and to secure funding for these programmes to operate.

Commercial customers will need to provide their delegate contact information for us to organise the correct training and be able to contact individuals to attend training. In addition, delegates may need to advise us of any specific learning needs so that the training can be set at the appropriate level.

Processing this information is necessary to meet the contractual obligations entered into by enrolment on a training or apprenticeship programme and for us to meet our legal obligations under the Apprenticeships, Skills, Children & Learning Act 2009.

When entering a training or apprenticeship programme with Key Training Group the enrolment, or contract, includes your **consent** to Key Training Group processing your information in line with this Privacy Policy.

You have the right to refuse to provide this consent however it should be noted that if you fail to provide the information required for enrolment and completion of any training, course or apprenticeship, or information required for funding purposes, Key Training Group will not be able to fulfil the contract for provision of services to you.

You also have the right to withdraw your consent to us processing your personal data at any time and this can be done by email GDPR@keytraining.co.uk, but again this will affect the continuing delivery of any training or apprenticeship programme you are enrolled on.

What do we use the information for?

- We will use the information collected from you to enable enrolment and participation through to completion in our training and apprenticeship programmes and secure funding for your programme.
- We will use your information for our own internal record keeping.
- We will use the information to organise commercial courses.
- We may use your information to improve our products and services.
- We will use your information to ensure we protect your health, safety and welfare.
- We use information about our employees to perform our duties and legal obligations as an employer.
- We will use relevant information to register for qualifications which allows us to issue with certificates.

As an organisation committed to excellence, we may want to use your information to send you relevant information by emails which will include information about changes to apprenticeship programmes, safety and safeguarding information or other information which we think you may find interesting. Sometimes we may also use your information to contact you to:

- Confirm details to send certificates □ Follow up your employment history
- Advise of new jobs available
- Allow you to enter free competitions

What sort of information do we keep?

The sort of information we keep may include:

- Your name, age or date of birth
- Your contact details including address, email address and telephone numbers
- National Insurance Number
- Your ethnicity or national origin
- Emergency contact details
- Health & Learning information
- Household Situation
- Unspent criminal convictions
- Employer information
- Education & Qualification Information
- Interview Information
- Demographic information such as post code, preferences and interests □ Other information relevant to customer surveys and/or offers

Who do we share your information with?

We will need to share the information we hold about you such as your personal details, education details, employment details, achievements and attendance with:

- Ofsted (the Regulatory Body for Training & Education)
- Employers
- Funding agencies such as the Education & Skills Funding Agency
- Awarding Organisations who verify your qualification and award your Certificates
- Referrers (such as Job Centres, Guardians, other referring agencies)
- Delivery Teams
- Auditors
- Our HR provider
- There may be occasions when we are legally required to share information with statutory agencies such as the Police, Local Authorities, Courts or HMRC. This may be in relation to Safeguarding risks, criminal or civil proceedings or fraud. Information can be shared without your consent in these circumstances.
- We will **not** share your information with third parties unless requested. For example, we may be required to share details of your attendance and participation with your Referrer (this may be a Job Centre or other agency who has referred you to us), with your Employer, with your Parents or Guardian. We will inform you of these requests but by giving your consent to us processing your information, your consent includes your agreement to us sharing details of your attendance and participation with your referrer.
- There may be other occasions when we are requested to provide information we hold on you, and we will seek your explicit consent to do this.

- We will not sell, distribute or release your personal information to third parties unless we have your permission or are required by law to do so.

How long do we keep your information?

Information	Retention Period
Personal Information collected at enrolment for Government Funding	Any financial documentation related to funding of your programme must be retained for the period set by the funding body (e.g. Education & Skills Funding Agency). This is usually for 10 years after the financial year end in which the programme ends as a minimum
E-Portfolio and related evidence of achievement	2 years from programme end date. This may be extended to 3 years if files are selected for auditing by external quality assessors
Personal Information collected prior to enrolment and stored on the CRM	
Successful Applicants	For the duration of their programme (see above)
Unsuccessful Applicants	6 months (if applying for future programmes will have to reapply)
Correspondence	
Email	12 months
Letters	12 months
Multi Media (SMS, Social Media etc.)	12 months
Surveys	24 months

Privacy Policy and your responsibility to inform us

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

Please send notification of change to: hr@keytraining.co.uk

Commercial training, please send to: GDPR@wwp.co.uk

Companies

Why do we collect information about your organisation?

We collect information to allow us to carry out the work of Key Training Group delivering any commercial training and apprenticeships within your organisation using our dedicated learning website, onsite visits and online portfolio.

We are required to collect this information by the Education & Skills Funding Agency, Department for Education, and other funding bodies, to deliver our services to the required standards and to secure funding for these programmes to operate. This also applies to organisations who have used their LEVY funds to access delivery of Apprenticeships.

Processing this information is necessary to meet the contractual obligations of enrolment for a training or apprenticeship programme and for us to meet our legal obligations under the Apprenticeships, Skills, Children & Learning Act 2009.

When entering a training or apprenticeship programme with Key Training Group the enrolment, or contract, includes your **consent** to Key Training Group processing your information in line with this Privacy Policy.

You have the right to refuse to provide this consent however it should be noted that if you fail to provide the information required for enrolment and completion of any training, course or apprenticeship, or information required for funding purposes, Key Training Group will not be able to fulfil the contract for provision of services to you.

You also have the right to withdraw your consent to us processing your company data at any time and this can be done by email GDPR@keytraining.co.uk, but again this will affect the continuing delivery of any training or apprenticeship programme or access to funding you have individuals enrolled on.

What do we use the information for?

- We will use the information collected from you to enable enrolment and participation through to completion in our training and apprenticeship programmes and secure funding for individuals on programmes.
- We will use your information for our own internal record keeping.
- We may use your information to improve our products and services.
- We will use your information to ensure we protect the health, safety and welfare of individuals on programme.
- We will use relevant information to register individuals for qualifications which allows us to issue certificates.

As an organisation committed to excellence, we may want to use your information to send you relevant information by emails which will include information about changes to programmes, safety and safeguarding information or other information which we think you may find interesting. Sometimes we may also use your information to contact you regarding:

- New Funding initiatives
- New programmes on offer
- Market Research
- Allow you to enter free competitions

What sort of information do we keep?

The sort of information we keep may include:

- Organisation Name, address, postcode, phone numbers
- Company registration numbers
- Employer Data Service Registration Number (ERN)
- Bank Details where eligible for Incentives
- Employer Liability Insurance Certificates

- Contact Information – Name, Phone & Email ○ Main Contact ○ Supervisors/Mentors ○ Levy Account Administrator ○ Accounts Department
- Employee Number (Locally & Nationally)

Who do we share your information with?

We will need to share the information we hold about your organisation such as your company details and relevant reference numbers (Companies house, ERN) with:

- Ofsted (the Regulatory Body for Training & Education)
- Funding agencies such as the Education & Skills Funding Agency
- Awarding Organisations who verify individual's qualifications and award their Certificates
- Delivery Teams
- Auditors

There may be occasions when we are legally required to share information with statutory agencies such as the Police, Local Authorities, Courts or HMRC. This may be in relation to Safeguarding risks, criminal or civil proceedings or fraud. Information can be shared without your consent in these circumstances.

We will **not** share your information with third parties except those stated above. There may be other occasions when we are requested to provide information we hold on you, and we will seek your explicit consent to do this.

We will not sell, distribute or release your information to third parties unless we have your permission or are required by law to do so.

How long do we keep your information?

Information	Retention Period
Company Information collected at enrolment for commitment to Government Funding	Any financial documentation related to funding of your programme must be retained for the period set by the funding body (e.g. Education & Skills Funding Agency). This is usually for 10 years after the financial year end in which the programme ends as a minimum
E-Portfolio	2 years from programme end date. This may be extended to 3 years if files are selected for auditing by external quality assessors
Company Information collected prior to enrolment and stored on the CRM	
Expressing an interest in enrolment of applicants onto programmes	3 years from date of initial enquiry
Correspondence	
Email	12 months
Letters	12 months
Multi Media (SMS, Social Media etc.)	12 months
Surveys	24 months

Privacy Policy and your responsibility to inform us

It is important that the data we hold about your organisation is accurate and current. Please keep us informed if any of your data changes during your relationship with us.

Please send notification of change to: hr@keytraining.co.uk

Commercial training, please send to: GDPR@wvp.co.uk

Employees

Why do we collect information about you?

As a responsible employer, Key Training Group will collect personal information from potential employees and obtain references. Key Training Group will process personal data about its employees relating to their individual contracts of employment and to comply with its legal obligations as an employer.

When entering into a contract of employment with us, it includes your **consent** to Key Training Group processing your information in line with this Privacy Policy.

You have the right to refuse consent or withdraw your consent at any time. It must be noted however that this may affect your employment with Key Training Group.

You also have the right to withdraw your consent to us processing your data at any time and this can be done by emailing GDPR@keytraining.co.uk, but again this may affect your employment with us.

What do we use the information for?

We use information about you as an employee to perform our duties and legal obligations as an employer

- Right to Work.
- Expenses, Payroll & HMRC
- DBS
- Management of your performance, appraisals and CPD
- Monitoring of SSP, SMP, Life Insurance & Pension requirements
- Monitoring of equality and diversity government directives
- Emergency contact details

What sort of information do we keep?

The sort of information we keep may include:

- Personal details: name, address, postcode, phone numbers, date of birth
- Bank Details
- Emergency Contact Details
- Relevant personal data relating to pension and life insurance
- Previous employment history including references
- Interview notes from application for employment
- Appraisals, CPD and one to one meeting notes from line manager

- Support and development plans
- Capability plans
- Risk assessment for pregnancy
- Exit Interview
- Car Insurance
- Contracts, updated contracts and restraint covenants

Who do we share your information with?

We will need to share the information we hold about with:

Externally

- HMRC & other relevant government departments
- Payroll Provider
- Pension & Life Insurance Providers
- DBS
- Awarding Organisations
- Auditors
- HR Provider

Internally

- HR Manager
 - Board Members as appropriate
 - Line Manager
- There may be occasions when we are legally required to share information with statutory agencies such as the Police, Local Authorities, Courts or HMRC. This may be in relation to Safeguarding risks, criminal or civil proceedings or fraud. Information can be shared without your consent in these circumstances.
 - We will **not** share your information with third parties except those stated above. There may be other occasions when we are requested to provide information we hold on you, and we will seek your explicit consent to do this. (Applications for confirmation of income – Renting, Mortgages etc.)
 - We will not sell, distribute or release your information to third parties unless we have your permission or are required by law to do so.

How long do we keep your information?

Information	Retention Period
Personal Information detailed above	Throughout the period you are employed
	7 years after the individual leaves employment

Privacy Policy and your responsibility to inform us

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

Please send notification of change to HR at HR@keytraining.co.uk

Applying to Individuals, Companies and Employees

How to get a copy of the information we hold on you

You have the right to make a Data Subject Access Request to receive a copy of the information we hold about you. No payment is required, and we will provide the information to you within 40 days of receiving and verifying your request.

To request a copy of the information we hold on you, you will need to contact

Individuals and companies: email GDPR@keytraining.co.uk

Employees: email HR@keytraining.co.uk

On receipt of a request for information, Key Training Group will contact you for confirmation of identity before any information will be released.

What is non-accessible information?

We will be as open as we can about the information we keep on you, but there are certain limits to what we can legally give you access to. For example, we will not give you information:

- About other people, including members of your family
- That needs the permission of the person(s) who gave it to us, before we can pass it on to you
- That may cause harm to you or another person if we gave the information to you
- We will inform you if there is any information that we cannot share with you

What else can you ask us for?

As well as your right to access the information we hold on you by making a Data Subject Access Request, you also have the right to have the information amended, to have it deleted, to have the processing restricted or to object to the processing. This may apply if you believe the information we hold on you is not accurate, untrue or is incomplete.

In these circumstances you should contact the Data Protection Officer for Key Training Group.

What if you are not happy with what is happening with the information we keep about you?

Firstly, please email GDPR@keytraining.co.uk, who will respond to your query within 7 working days.

Lastly, if you are still not happy with how we are dealing with your information, you can write to the Information Commissioner's Office and ask them to look at the procedures we are following.

You can contact the Information Commissioner at:
Information Commissioner's Office

Whycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF
Telephone 01625 545 745

Further information about the work of the Information Commissioner and about data protection can be found at: www.ico.org.uk

About this Privacy Policy

This policy is provided to all training and apprenticeship participants at application and at enrolment, for companies as part of the agreements to training and to employees at the point of application.

A copy is also available on the Key Training Group website www.keytraining.co.uk

A copy of our Cookies policy is also available on the Key Training Group website <http://www.keytraining.co.uk/cookie-policy/>



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