



Data Privacy Policy (External)

Introduction

This Privacy Policy is for the following companies who come under the same ownership - HIT Training, Connect2Care and the Executive Development Network (EDN). We shall refer to this group of companies as any of the following - "HIT / we / us / our". Our ICO registration number is Z9510359.

This Privacy Policy explains in detail how we collect personal data, the reasons for this collection, the legal basis for processing and how we handle and maintain the security of the personal data we process.

You should note that we may change this privacy policy without notice. Please check back frequently to see any updates or changes made to this statement.

What information do we process and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

We hold personal data of four data subject categories. These include Learners, Employers, Suppliers and our Employees. This policy will focus on Learners and Employers only. Suppliers will receive the relevant information in the data processor agreements we hold with them and our Employees have internal notification not relevant to this document.

We may occasionally send relevant information in the form of newsletters, industry news, similar products and services, invitations to events and surveys in accordance with a data subject's preferences on an opt-in basis within our Contact Preference Centre.

Learners

We process Learner personal data to provide our training and certification services from initiation to completion. We are required to gather and submit personal data to be able to process a learner into a training programme and to share this data with the initial assessment & diagnostic organisation and relevant awarding & funding organisations.

Once a Learner is accepted into a training programme we use the data for communication, training, reporting, provision of training materials & platforms, certification should you complete, and for the management and monitoring of progress. Depending on the programme we will share your data with an End Point Assessment Organisation and for some programmes an ELearning Organisation. Learners that are not accepted onto a programme or withdraw during the sign-up process will have all personal data captured up to that point automatically erased within 3 months.

For Learners we collect and hold name, gender, email, social media handle, address, date of birth, phone/mobile number, National Insurance number, nationality, occasionally passport details, place of birth, employment history, qualifications and Unique Learner Number (ULN) from the Learner Record Service. We are required to capture the following special categories: ethnicity; disability/learning difficulties.

We regard the use and processing of the above personal data categories within the obligation of a contract entered into with us by the data subject for the provision of training services. Without it we could not deliver a training course.

During your training programme we will be required to confirm personal data for funding and assessment purposes. This includes, but is not limited to, name and signature on funding forms, voice recordings to assess competence and in some cases video and/or audio recordings, dependent on the requirements of your training programme. We



confirm this as being an obligation of a contract entered into by a data subject as we could not run the training without it

Employers

We process the personal data of the nominated person(s) within an Employer to provide training and certification services to the Employer's employees (Learners). We use this data to communicate with the Employer about a Learner's progress and any facilitation required. We also use this data to process the following: payments; if applicable, applications to the nominated End Point Assessment Organisation for assessment and certification.

For Employers we hold the nominated person's name, job title, place of work address, email address and phone/mobile number. These are processed as part of an obligation of a contract with which an Employer and its representative are party to.

How do we collect your personal data?

Points of collection include: Learners and Employers contacting us directly; Our website(s) contact us form; Various job vacancy website enquiry forms; Industry events we attend; Our employees or designated agencies as part of our legitimate interests for business development; Other training or funding organisations passing us Learner or Employer personal data upon request from an Employer or the ESFA.

Data Retention

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

We maintain a policy of retaining Employer and Learner personal data in accordance with the Education and Skills Funding Agency ([ESFA](#)) who is our governmental funding body. The ESFA's retention period is currently twenty years after the final use of personal data related to our services and products have been rendered. This is due to the way funding is allocated and we are audited

At the end of that period, your data will be anonymised so that it can be used in a non-identifiable way for statistical analysis and business planning.

Who do we share your personal data with?

We share personal data with trusted third parties categorised under four headings: Learning, Funding, Certification and Internal Business Systems. The headings are designed to indicate the work function each third party is associated with:

- Learning for provision of training materials & platforms to Learners and Employers.
- Funding for the governmental funding organisations we receive funding from.
- Certification to indicate relevant awarding organisations.
- Internal Business Systems to store and facilitate all communication, training, reporting, and for the management and monitoring and the running of our business.

Without the use of these third-party services we would not be able to operate in the way we do. The policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our data processor contract / agreement with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.



We may, from time to time, move supplier. If this happens, your personal data will, where relevant, be transferred to the new data processor in alignment to the policy mentioned above. If you require further specific information around our third parties data processors please contact us using the information below, specifying the exact nature of the information you require:

- email: dataprotection@hittraining.co.uk
- post: Data Protection Officer, 24a Cecil Pashley Way, Shoreham by Sea BN43 5FF

Data Security

We recognise the importance of data security and take a number of measures to ensure the security of personal data. These include training all staff on data protection and cyber security via an in-house set of training videos and tests conducted upon induction and annually.

Access to your personal data is password-protected, and only those with permission are granted access. Any misuse of personal data by our employees is considered a disciplinary offence and a full investigation is automatically entered into. All breaches are recorded in a breach log as required and we regularly review how improvements can be made at every stage.

We conduct randomised checks on offices, employees and equipment as part of our ongoing and continual improvement of organisational and technical security measures. If a data breach is discovered, it should be reported straight away to dataprotection@hittraining.co.uk

How you can access your data

We try to be as open as we can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal data by making a 'Subject Access Request' (SAR). There is no charge for such a request and we will respond within 30 days of a verified* request. If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to
- let you have a copy of the information in an intelligible form

To make a SAR to us for any personal information we may hold you need to put the request in writing addressing it to either:

- email: SAR@hittraining.co.uk
- post: Data Protection Officer, 24a Cecil Pashley Way, Shoreham by Sea BN43 5FF

** To protect the confidentiality of your information, we will ask you to verify your identity before we proceed with any request you make under this Privacy Policy. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act. From the date we receive this information we will respond within 30 days.*

We will try to deal with your request informally if you agree this is the best way to proceed, for example by providing you with the specific information you need over the telephone or by email. If we do hold information about you, you can ask us to correct any mistakes by making the request to the same email or postal address above.

If we choose not to action your request, we will explain to you the reasons for our refusal. If we feel your request isn't covered under the definition of a SAR we shall endeavour to assist you to the best of our ability.

Further data subject rights

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.



Individuals whose personal data we hold, and process have the following rights:

- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it (in the first instance we would ask a Learner to do this through their Trainer).
- Where we are using consent as our legal basis for processing your personal data (e.g. electronic communications inclusive of newsletters, industry news, similar products & services, invitations to events and surveys) you have the right to object at any time. Send your request to dataprotection@hittraining.co.uk
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your personal data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data if there is no other legal basis for its retention.

Contacting the regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO). You can contact them by calling [0303 123 1113](tel:03031231113). Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites).

Any questions?

If you have any questions that haven't been covered, please contact us and we will be pleased to help you:

- email: dataprotection@hittraining.co.uk
- post: Data Protection Officer, 24a Cecil Pashley Way, Shoreham by Sea BN43 5FF

Last Review: 10/3/21

Next Review: March 2022

Person Responsible for review: Rob Pearce DPO

This Policy has been agreed by Jill Whittaker, Managing Director