



Privacy Policy 2019-2020

Document version control

Document title:	Privacy Policy 2019-2020
Document status:	Final
Version number:	3.0
Date:	02.07.2019.
Author:	Board
Approved by:	Board
Review date:	September 2020

Contents:

Section	Section Title	Page
1	Privacy Notice - Introduction	3
1.1	What will the Welsh Government/ESFA and Educ8 use your information for?	3
2	Your rights and choices	3
3	How long will the Welsh Government/ESFA and Educ8 keep your information?	4
4	Contacts	4
5	Notifications of changes	5
6	What personal information about you is collected and used by the Welsh Government/ESFA?	5
7	How will your data be used by the Welsh Government/ESFA and Educ8?	6
8	Who does the Welsh Government/ESFA share your data with?	6
9	Data Sharing Agreements	7
10	Security Arrangements for your data held by the Welsh Government/ESFA	7

1. Privacy Notice – Introduction:

This policy relates to Educ8 Training Group ('Educ8') consisting of Educ8, Educ8 Training England, Network Training Services and ISA Training.

The learning programmes you will enrol on is funded either directly by the Welsh Government/ESFA or part funded via the European Social Fund (ESF) (through the Welsh Government/ESFA).

Taking part in this programme is dependent on you providing personal data. The Welsh Government/ESFA will be the data controller for the personal information it receives.

The Welsh Government/ESFA will use this data to carry out its public task in the administering and monitoring of its funds. Other information will be kept by Educ8 to administer the programme.

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 Educ8 for ESF audit purposes, a sample will be sent to Welsh Government.

For a full list of personal and special category data used by the Welsh Government//ESFA please click here for the full privacy notice www.wales.gov.uk/llwr

1.1 What will the Welsh Government/ESFA and Educ8 use your information for?

The Welsh Government/ESFA and Educ8 will use your data for funding, planning and policy development as well as monitoring learner outcomes (such as achievement of qualifications). It will also be used in statistics and research about post-16 learning.

Your data will also be linked for research purposes to other educational records held by the Welsh Government/ESFA such as the Pupil Level Annual Schools Census, the Welsh Examinations Database and Higher Education Statistics Authority, and to other records held by UK Government such as employment data, so that the Welsh Government/ESFA can calculate learner destinations measures and also understand the impact of post-16 provision on wider outcome.

Any statistics published by the Welsh Government/ESFA are anonymised, meaning that individual learners cannot be identified

2. Your rights and choices:

Under the General Data Protection Regulation (GDPR) you have the right to:

- Access the personal data the Welsh Government/ESFA and Educ8 holds on you
- Require the Welsh Government/ESFA and Educ8 to rectify inaccuracies in that data
- Object to processing on grounds relating to your particular situation (in some circumstances)
- Restrict processing (in some circumstances)
- Have your data erased (in certain circumstances)
- Lodge a complaint with the Information Commissioner's office (ICO) who is the independent regulator for data protection

3. How long will the Welsh Government/ESFA and Educ8 keep your information?

Data Type	Data Retention Period	Data Uses
Further Education and Adult Community Learning	Your data will be deleted after 10 years	This enables the Welsh Government/ESFA to analyse funding and create reports over a period of time. These reports can be used to help inform policy decisions or to forecast future funding. Where learning is ESF funded, data is kept so that it can be checked and audited. The timescales for keeping data are decided by the European Union
Work Based Learning	Your data will be deleted 10 years after the end of the contract period	
Welsh For Adults	Your data will be deleted after six years	

4. Contacts:

For further information about the information which Educ8 holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

FAO: Data Protection Officer
 Educ8 Training Group Ltd
 Suite 10
 Tredomen Gateway
 Tredomen Business Park
 Ystrad Mynach
 Caerphilly
 CF45 4SN
dpo@educ8training.co.uk

For further information about the information which Welsh Government/ESFA holds and its use, or if you wish to exercise your rights under the GDPR, please see contact details below:

Data Protection Officer
 Welsh Government
 Cathays Park
 CARDIFF
 CF10 3NQ
dataprotectionofficer@gov.wales

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/>

5. **Notifications of changes:**

If we are going to use your data in a different way from that stated at the time of collection, you will be notified. All of the Welsh Government/ESFA and Educ8's processing will be in compliance with the extant data protection legislation. Updates to the privacy notice will be available on Welsh Government's /ESFA's website.

6. **What personal information about you is collected and used by the Welsh Government/ESFA?** Some of the data collected by Educ8 about you and sent to Welsh Government for the LLWR will be **personal data** and/or **special category data** as defined in the General Data Protection Regulation which includes:

Personal Data

- A unique learner identifier (created by the Welsh Government//ESFA)
- A learner Identifier number (created by Educ8)
- Surname
- Forename(s)
- Address
- Postcode
- Telephone number
- National Insurance Number
- Gender
- Surname at 16
- Date of birth
- National identity
- The last school you attended
- The year you left school
- A unique learner number (created by the Learning Records Service)

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

This personal/special category data will be used across all Post 16 learning within Further Education, Work Based Learning, Adult Community Learning and Welsh for Adults.

7. **How will your data be used by the Welsh Government/ESFA and Educ8?**

- For administration purposes, to ensure the data we collect about you is stored correctly, securely and to a high standard of quality
- To help make decisions on current and future policies for post-16 learning
- To help the Welsh Government/ESFA allocate and monitor funding of post-16 learning, including learning which is jointly funded by the European Social Fund
- To give auditors the information they need to do their job
- To enable Educ8 to resolve any data issues they may have on their systems

- To help monitor equality and diversity in post-16 learning across Wales and England
- In analysis and research, where we will sort through the data to identify patterns and similarities. This will allow Welsh Government/ESFA to make future improvements to post-16 learning
- To produce anonymous official statistics on post-16 learning in Wales and England
- For ad-hoc requests for analysis from stakeholders and the general public
- To enable Educ8 to measure and compare their own performance
- By third party contractors to carry out data analysis and linking, so that we can calculate performance measures
- By third party contractors working on research and evaluation commissioned by the Welsh Government/ESFA.
- By other researchers who may access anonymised data with the approval of Welsh Government/ESFA.

8. Who does the Welsh Government/ESFA share your data with?

Currently the Welsh Government/ESFA shares your data with these third-party organisations:

- Qualifications Wales
- Careers Wales
- Estyn
- OFSTED
- HEFCW
- NHS Wales Information service (NWIS) and Secure Anonymised information linkage (SAIL)
- UK Government Department for Education

The following third-party contractors commissioned by the Welsh Government/ESFA to carry out evaluations and research:

- Evaluation contractors
- Learning and work institute
- Arad Consulting
- IFF Research

The following third party contractors who carry out data matching and analysis:

- London Economics Ltd
- FFT Education Ltd

9. Data Sharing Agreements:

The Welsh Government/ESFA will have a formal data sharing agreement in place whenever we share your data with a third party. Part of the agreement means the third party will have to sign a confidentiality agreement in relation to your data to show that they operate satisfactory information security procedures and that destroy their copies of your data when it's no longer needed. They can only use your data for the reason they sign up to and nothing else. All copies of data transfers are logged and recorded.

10. Security Arrangements for your data held by the Welsh Government/ESFA:

The data the Welsh Government/ESFA collects about you will be stored in an access

controlled secure database which is regularly tested for safety and integrity.