

## **Education & Skills Learner/Apprentice Privacy Policy**

The privacy and security of your personal information is very important and we want to ensure that your data does not end up in the wrong hands or being used in any ways it shouldn't. In this document we tell you how we use and look after your personal data and your legal rights.

This policy applies to you if you apply to us and/or start on an apprenticeship or course with us. You may have given us your personal information by phone, in person, on a written form, via the website or social media.

This policy does not cover any other groups of individuals other than learners and potential learners. For our group [Privacy Notice, please click here.](#)

### 1. Who we are

The Growth Company Education & Skills is a training provider. We provide courses, degrees and apprenticeships. We operate through a company called Skills & Work Solutions Limited, which is part of a wider group of companies which come under The Growth Company brand.

If you have any queries, you can call us on 0161 233 2656 or email us at [recruitment@theskillsco.com](mailto:recruitment@theskillsco.com). If you have a question specifically about this privacy policy or the way we use your personal information, please contact our Data Protection Officer on [DPOfficer@growthco.uk](mailto:DPOfficer@growthco.uk).

You also have the right to make a complaint to the Information Commissioner's Office but if you do have any concerns, we'd like the chance to fix them so please contact the Data Protection Officer first.

### 2. The data we collect about you

Personal data or information means any information about an individual from which that person could be identified. We may collect, use, store and transfer different kinds of personal data such as:

- Identity – name, date of birth, gender
- Contact – home address, email, telephone numbers, parent contact details
- Financial – bank details
- Transaction – details about payments to you
- Application – employment history, passport or other ID
- Technical – IP address, browser type and version and other data about how you've accessed our website
- Profile – interests, career goals, survey responses
- Usage – how you use our website, how you are progressing on your apprenticeship or course
- Marketing – whether or not you want to receive marketing messages from us
- Special – ethnicity, learner support needs, criminal convictions

If you fail to provide the data we request we may not be able to progress your application or take you on as a learner.

### 3. How is your data collected

You may give us your data when you visit our website/social media pages, fill in forms or contact us such as when you make an enquiry, apply for or start on an apprenticeship or course with us. We may also receive personal data about you from other places and people:

- Job boards e.g. Get my First Job, Career Map, RADAMA (identity, contact, profile data)
- Your school or careers advisor or someone else who is helping you apply for courses and apprenticeships (identity, contact, profile data)
- Analytics providers such as Google (technical data)

#### 4. How we use your data

We will only use your personal data when we are allowed to by law. The most common reasons why we use your data is to

- Where we need to form a contract with you
- When it is necessary to use the data in order to provide the services we offer, providing we balance your rights when we do this (known as 'legitimate interests')
- Where we need to because it is a legal requirement

The table below tells you how we use your data, what types of data we're using and the reason why we are allowed to use it:

Activity	Type of data	Reason
To register you as interested in our courses and apprenticeships	Identity Contact Special*	To contact you to find out more about what sort of course of apprenticeship you're looking for and/or invite you in for an interview (legitimate interests)
Interview with one of our careers team	Identity Contact Application Profile Special*	To assess which course or apprenticeship is right for you (legitimate interests)
Updating your school/careers advisor on your progress	Identity Profile Usage	So that your school knows how we are going to help you
Sending your CV to potential employers	Identity Contact Application Profile	So that the employer can consider if they want to offer you an interview with them (legitimate interests)
Enrolment onto an apprenticeship or course	Identity Contact Application Profile Special*	So that we can start you on your programme (forming a contract with you). This information is sent to the ESFA. We may also need to photograph you for your security pass to access our centre(s).

Paying bursaries (where applicable)	Financial Transaction	On some of our courses, we pay learners for attending and therefore we might need your bank details (forming a contract with you)
Registering you for your qualifications with awarding and certification bodies	Identity Contact	To be able to register you and claim your certificates as part of your programme
Updating your employer on your progress	Identity Application Profile Usage Special	So that your employer can make sure you are progressing on your qualification in the right way (legitimate interests)
To keep you updated with our privacy policy or with other changes to the company	Identity Contact Profile Usage	To send you updated privacy policy (legal obligation) or to advise you of other changes (legitimate interests)
To enable you to complete a survey or enter a competition	Identity Contact Profile Usage Marketing	So that we can understand how we can help learners (legitimate interests)
To protect our website	Identity Contact Technical	So that we can make sure our website is working (legitimate interests)
To deliver relevant website content and adverts to you and measure the effectiveness of our adverts	Identity Contact Profile Usage Marketing Technical	So that we can look at how our customers use our services to inform our marketing strategy (legitimate interests)
To use data analytics to improve our website, services, marketing and customer relationships	Technical Usage	To keep our website updated, to develop our business strategy (legitimate interests)
To make suggestions and recommendations to you about other courses or apprenticeships which may be of interest to you	Identity Contact Profile Usage Technical	To grow our business and achieve excellent progression rates (legitimate interests)

\*For special personal data we collect, we need to provide additional specific information as to what we are using this data for:

- Ethnicity – so that we can ensure we are providing a service that provides equality of opportunity and treatment (public interests)
- Additional learner needs – so that we can ensure we are providing a service that provides equality of opportunity and treatment (public interests)

- Criminal convictions – you may choose to tell us about any previous criminal convictions when we interview you or whilst you are learning with us (consent)

Where we use consent as the reason for processing your data, you are able to withdraw this at any time by emailing [recruitment@theskillsco.com](mailto:recruitment@theskillsco.com). If you want to do this, we will discuss with you the impact of this on the services that we can offer you.

## Marketing

You will only receive marketing communications from us if you have told us you want to. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message.

### 5. Sharing your personal data

We may have to share your personal data with some organisations for the purposes in the table above:

- Your school and/or careers advisor
- Potential employers
- ESFA

They are only allowed to process your personal data in the ways we tell them or which they are legally required to do. For schools and careers advisors, this is so they know what course or apprenticeship you're going to do with us. For employers, this is so they can see if you would be suitable for an apprenticeship with them. For the ESFA, this is so they can pay us for the training we are providing.

### 6. Data security

We have security in place to stop your data being lost or used in an unauthorised way. If we do suspect that something unauthorised has happened to your data we will let you know.

### 7. Data retention

The length of time we keep your data is determined by the government departments which fund

### 8. Your legal rights

Sometimes you have rights in relation to your personal data and are entitled to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please email [recruitment@theskillsco.com](mailto:recruitment@theskillsco.com).

You don't have to pay a fee to access your personal data but we may charge if your requests are unreasonable.