

# PRIVACY POLICY

## 1) Purpose

Engineering Trust Training (ETT) provides recruitment and training services for apprenticeships in the engineering sector. Our services require the collection and use of personal data for learners, employers, and staff. ETT is committed to complying with the Data Protection Act 2018 and GDPR, acting as the Data Controller for personal data collected. ETT is registered with the Information Commissioner's Office (ICO), registration number Z5955910.

## 2) Lawful Basis for Processing Data

- a) ETT processes personal data primarily to fulfil its contractual and legal obligations. The main lawful bases for data processing are:
  - i) Contractual Necessity: Processing is required to manage apprentice enrolment, progression, and completion, as well as to fulfil apprenticeship agreements.
  - ii) Legal Obligation: Processing is necessary for compliance with ESFA and other government or regulatory requirements, including funding and auditing purposes.
  - iii) Legitimate Interests: In certain cases, ETT may process data based on legitimate interests, such as improving services, communications, or monitoring learner outcomes, provided these do not override data subject rights.
  - iv) Where consent is required for certain activities, ETT will clearly request this consent and allow individuals to withdraw it at any time.

## 3) What Information We Collect

- a) ETT collects and processes the following categories of personal data:
  - i) Learner Information: Including name, contact details, date of birth, educational background, qualifications, and any other data required for apprenticeship registration, delivery, and completion.
  - ii) Employer Information: Company details, contact information, and relevant employment details related to apprentice sponsorship and participation in training.
  - iii) Application and Enrolment Data: Data provided by learners and employers during application, including prior qualifications, eligibility information, and other data necessary for enrolment.

- iv) Attendance and Assessment Records: Information on attendance, progress, and assessment outcomes to monitor and report learner progress.
- v) Financial and Funding Data: Necessary data for apprenticeship funding claims, in compliance with ESFA requirements.
- vi) Health and Support Needs Data: Where necessary, we may collect information related to health conditions or learning support needs to provide suitable accommodations and ensure learner wellbeing.

#### **4) How We Use Your Information**

- a) ETT uses personal data to:
  - i) Deliver apprenticeship services and manage learner progress.
  - ii) Comply with ESFA, funding body, and other statutory requirements.
  - iii) Monitor, evaluate, and report on learner performance, progression, and funding eligibility.
  - iv) Communicate with learners, employers, and regulatory bodies.
  - v) Provide information about relevant training opportunities, events, and services (if consent is given for marketing).
  - vi) ETT will not use personal data for unrelated marketing or share data with third parties for marketing purposes without explicit consent.

#### **5) Data Retention and Deletion**

- a) Personal data is retained according to ETT's Data Retention Policy and ESFA guidelines. This includes:
  - i) Learner Data Retention: Learner records are retained for a minimum of six years after the completion of the apprenticeship programme to meet ESFA audit requirements. This includes enrolment, attendance, assessment records, and completion data.
  - ii) Employer and Funding Data Retention: Financial and funding data related to apprenticeships is retained to meet statutory reporting and auditing obligations.
  - iii) Deletion Process: At the end of the retention period, personal data is securely destroyed in line with ETT's data destruction policy, ensuring it is unrecoverable.

#### **6) Data Security**

- a) ETT implements robust security measures to protect personal data, including:
  - i) Access Control: Access to personal data is restricted to authorised personnel only.

- ii) Data Encryption: Data is encrypted during transmission and at rest where applicable.
- iii) Physical Security: Physical records are stored in secure, access-controlled facilities.
- iv) Ongoing Security Audits: Regular audits and reviews of our security practices are conducted to safeguard against data breaches and unauthorised access.

## **7) Rights of Data Subjects**

- a) Data subjects have the following rights regarding their personal data:
  - i) Right to Access: You have the right to request access to the personal data ETT holds about you. We will respond to such requests within one month.
  - ii) Right to Rectification: If your data is inaccurate or incomplete, you may request correction. We aim to rectify inaccurate data within one month of your request.
  - iii) Right to Erasure: You may request the deletion of your data in certain circumstances. However, data required for ESFA auditing or legal obligations may be retained as necessary.
  - iv) Right to Restriction of Processing: You may request that we limit the processing of your data if you contest its accuracy or object to its use.
  - v) Right to Object: You have the right to object to data processing for direct marketing purposes and any processing based on our legitimate interests.
  - vi) Right to Data Portability: Where applicable, you may request a copy of your data in a structured, commonly used format.

## **8) Withdrawal of Consent**

- a) If ETT processes your data based on your consent, you have the right to withdraw this consent at any time. Please note that withdrawing consent may impact our ability to provide you with certain services.

## **9) Data Sharing and Third Parties**

- a) ETT does not share personal data with third parties for marketing purposes. Data may be shared with third parties for operational purposes, including:
  - i) Funding and Regulatory Bodies: ESFA and other government agencies as required by law.
  - ii) Partner Organisations: Approved subcontractors or training providers who deliver elements of the apprenticeship programme.
  - iii) Auditors and Legal Authorities: For compliance with audit and statutory obligations.

- iv) ETT ensures that third-party providers adhere to strict data protection standards.

#### **10) Data Transfers**

- a) ETT does not transfer personal data outside the UK or EEA. If this changes, ETT will ensure any international data transfer complies with UK GDPR requirements and will inform data subjects of the relevant safeguards.

#### **11) Cookies and Website Tracking**

- a) Our website may use cookies to improve user experience and analyse web traffic. Users are notified of the use of cookies upon visiting the site and have the option to disable cookies through their browser settings. For further details, please refer to our Cookie Policy.

#### **12) Changes to This Privacy Policy**

- a) ETT may update this privacy policy from time to time to reflect changes in legal obligations or practices. Any significant changes will be communicated via our website or direct email notifications. The date of the last update is provided at the end of this policy.

#### **13) Complaints and Contact Information**

- a) ETT aims to uphold the highest standards in handling personal data. If you have any concerns or wish to make a complaint about our data practices, please contact the Data Protection Officer, Mark Vingoe.

#### **14) Contact Us**

- a) If you want to request further information about our privacy policy, please contact us: Engineering Trust Training Ltd, The Engineering Skills Academy, Wedgwood Road, Bicester, OX26 4UL. Telephone 01993 882008.  
Email [info@theengineeringtrust.org](mailto:info@theengineeringtrust.org)