

Privacy Policy

This notice provides a summary of the full **GlobeUs Training Ltd** Privacy Statement. Both the notice and the **GlobeUs Training Ltd** Privacy Statement apply to information collected by **GlobeUs Training Ltd** via the www.globeustraining.co.uk website and in any manner described in the **GlobeUs Training Ltd** Privacy Statement.

Who Controls the Data?

Data Controllers are people such as administrators and receptionists who take in information and pass it to Data Processors. Data Processors are members of staff that then use this data for purposes such as enrolment, personal record checks etc.

Personal Information – Purpose and Disclosure

Apprenticeships

We collect personal data about you when you enrol as a learner/ candidate. At enrolment, we may ask you for sensitive personal data and for your consent to use it for a specific purpose. If you do not wish to provide this information, you will need to make this known to us by not ticking the agreement box on the Personal Learner Information Form.

We share some of your personal data with the Skills Funding Agency. The ESFA through their Learner Registration Service allocates Unique Learner Numbers (ULNs) which enable individuals to access their participation and achievement data. The SFA will share your **GlobeUs Training Ltd** participation and achievement data with other organisations if you tell **GlobeUs Training Ltd** that you are happy for the ESFA to do so.

We also share your personal data with our prime contractor HTP Apprenticeships (IOW) Ltd in order to receive funding for you through our sub-prime contract agreement.

If applying for job roles, this is done via Indeed or the Government Apprenticeships Service, and data is stored according to their own privacy policies. Data may then be given to prospective employers as required with your permission.

We must share your personal data with our Awarding Bodies: NCFE/CACHE, ForSkills, and Apprenticeships Certificates England. We must also share some data with our e-Portfolio system OneFile. This is basic information collated at enrolment, held securely; you have access to all of this information.

If government funding is available for your course, we collect personal data from you to assess your eligibility for that funding using the ESFA's Personal Learner Record Service.

We collect certain personal data about you when you enter competitions, and may retain email address information for future promotions, surveys, newsletters, or marketing campaigns.

You may provide us with further personal data if you use one of our learning or communications facilities or use one of our online skills tests.

Short Courses

We collect personal data about you when you enrol onto any of our courses. At enrolment, we may ask you for sensitive personal data (e.g. name, date of birth, address etc.) and for your consent to use it for a specific purpose. If you do not wish to provide this information, you will need to make this known to us by not ticking the agreement box on our website; if you are paying by invoice, we will ask you to confirm in writing that you agree to our use of your data.

We must share your personal data with our Awarding Bodies: Highfield ABC or BIIAB.

If you opt for our Personal Licence Application Service, we will also be required to share your personal information with the Disclosure and Barring Service via the UK Government; this includes a verification of identity check using Royal Mail, the Post Office, or Experian. We will also be required to ask you security questions based on your credit history; this information is gathered via the telephone and is not stored in any way.

Once the DBS has been received, we will then be required to share your personal information with your local authority in order to apply for your licence. Please refer to their individual Privacy Policies for further information on how they may use your information.

Any identification documents and personal information forms are kept securely within our office at GlobeUs Training, and are securely destroyed as soon as the process is complete and your licence received.

Original documents (e.g. your certificate, DBS etc.) are posted to you with the licence.

Your data may also be stored on the Royal Mail website; we use your address details to generate postage labels in order to send your licence to you. This information is stored for us to track the envelope through the system. Information is regularly deleted from the site periodically.

Website

We use cookies and other technologies to keep track of how you interact with our website and to target advertising.

We may use your email address for marketing purposes, but will **never** share with any other third-party organisations.

Your Rights

You can request at any time:

- Access to a copy of the personal information we hold about you, including next of kin;
- Correction of any inaccuracies in your information;
- Restrictions in processing, e.g. not agreeing to marketing emails;
- Data portability: you have the right to move, copy or transfer your personal data from one IT environment to another in a safe and secure way, without hindrance to usability;
- Your information to be erased permanently unless required for legal and/or contractual requirements.

You may also turn cookies off in your browser. However if you do so, you may not be able to use certain features on the website.

We do not use data for personal profiling or automated decision making.

Important Information

Your personal data is protected by UK data protection law including GDPR. You can find the details for the UK Information Commissioner at www.informationcommissioner.gov.uk.

Lawful Bases for Processing

The lawful bases for processing are set out in Article 6 of the GDPR, of which there are 6.

1) Consent

We will ask your for consent to process your data for a specific purpose; for example, marketing. This will be asked for as part of your acceptance of our Terms and Conditions and/or Privacy Policy/

2) Contract

Within Apprenticeships, we ask you to sign a Commitment Statement and Individual Learner Record which contractually allows us to process your data in order to enrol you on to programme. Contractual consent is gathered via specific forms, in which it is specified how and why your data will be used.

3) Legal Obligation

Whilst our data is not processed for legal purposes, we must gather certain data in line with other procedural purposes, such as to be compliant with ESFA funding rules. Other processes by external companies using the information we pass on may be for a legal obligation. Please refer to their own Privacy Policies for further information.

4) Vital Interest

None of the data collected by GlobeUs Training will be for a Vital Interest.

5) Public Task

None of the data collected by GlobeUs Training will be for the public interest.

6) Legitimate Interest

Unless agreed via consent or a contract, data collected by GlobeUs Training will only be used for legitimate purposes, such as applying for funding or registering a candidate with an awarding body. No data will be collected unless absolutely needed under the legitimate interest basis, unless the person has given us express consent or signed a contractual agreement.

Giving information for other people

When you give us information about another person (e.g. next of kin, colleague etc.), the other person must have agreed to let:

1. Us process all their personal data; and
2. You receive any data protection notices for them.

When you send information for someone else, you are confirming that you have told them:

- Which data they must give;
- Which information is voluntary; and
- How they can access and, if necessary, correct the data we hold about them.

It is suggested for you to forward them a copy of this policy.

The Information we Collect

Apprenticeships

When you enrol with us for an Apprenticeship, you (or the person enrolling you) must tell us:

- your full name;
- your gender
- your date of birth;
- your address (and correspondence address if different);
- primary telephone number;
- next of kin information;
- your employment status;
- where you heard about us;
- email address;
- your education so far;
- your citizen status and;

- where you live and how long you have lived there.

We use this information to check whether you are eligible for funding. If you are not eligible then this information will be destroyed.

We may also ask you for information regarding your:

- race or ethnicity;
- disability status;
- learning difficulties;
- religion;
- physical and mental health;
- sexual orientation.

This is for Government data collection purposes only and is anonymous; this cannot be linked to you in any way and will in no way impact on your programme or be used to discriminate against you, unless information regarding health/ disability/ learning difficulties will help us to further assist you whilst on programme with us; this will only be used to your benefit.

Learner File

When you start your learning we will create a Learner File to hold the documents which relate to your learning and evidence of proof of identity and funding eligibility. As you progress through your learning other documents, including some of your course work, may be held on this file.

OneFile

For candidates using our online e-Portfolio system, information collated at enrolment will be inputted onto the OneFile system; this is a secure site and you will have a log in to view all data held. This is also a central point for your assessments and coursework and is only viewed on a need-to-know basis by Centre Managers, Assessors, and Quality Assurers.

At or before enrolment you may be asked for sensitive personal information but you do not have to provide it. If you decide to provide sensitive personal data we will use it for the purposes described in the section above. If you do not want to provide it, or do not want us to use it for these purposes then when enrolling online please select the "prefer not to say" option if enrolling in a GlobeUs Training Ltd centre select the "Not Known/Not Provided" option.

You may also volunteer sensitive personal data to us or our approved service providers, for example, when you submit a query or comment to us via the website or some other means of communication. If you do so, you explicitly consent to our using such information as described in this Privacy Statement.

Social Media

We may occasionally ask for "Celebrating Success" photographs with you which are shared on our website and/or Social Media pages. This is only done so with your express permission and for those aged 18 or over. Should you not wish for the photos to be shared, or wish to limit where and how they are shared, please express this at the time. Further information can be found on our Photographs Permission Form which is completed each time a photo is to be taken.

Employers

We will only use the following information whilst a candidate based with you is on programme with us. This is shared with the ESFA and Ofsted for funding purposes only, but we may use your email address for marketing purposes, such as a newsletter or survey. Please update us with contact preferences as and when they change.

- Current registered address
- Manager name
- Mentor name (if different from manager)
- Contact telephone number

- Email address
- EDRS number (as taken from Government LSC website)

Short Courses

When you purchase a course online, we will ask you for the following information:

- Candidate name
- Candidate date of birth
- Contact telephone number
- Contact email address

For Personal Licence Application Services, we will also ask you to provide the following information:

- Marital status
- Applicant name
- Date of birth
- Previous names and date of change
- Town and country of birth
- Nationality
- National Insurance Number
- Current home address
- Home addresses and dates of residency to cover the past 5 years
- Contact telephone number and email address
- Passport number
- Driving licence number
- Biometric Residency Card number
- Declaration of previous convictions

We will also ask you to provide copies of your photo ID, right to work in the UK, proof of current address, and formal statements such as a bank statement. This will be stored securely and is only for the purpose of your DBS check and Licence Application. Following the issue of the DBS and/or Licence, this information will be securely destroyed.

During the DBS application, we will use your ID provided to verify your identification; however, we are also required to ask you security questions based on your credit history; this is completed over the phone and inputted into the Royal Mail Verification Service website, and is not stored by us in any way.

We may also contact you in the future for feedback surveys (via TrustPilot) and for marketing purposes. Please update your contact preferences with us at any time should you change your mind.

How we may further use the information we collect

We use your personal information:

- to answer your queries or complaints;
- to deliver our services, for example on-line tools to test your skills;
- to support your learning;
- to provide course materials;
- to carry out administration;
- to improve the quality of services;
- to support your application for government funding;
- to obtain customer feedback;
- for general statistics and research;
- for obtaining any relevant professional advice;

- as may be required by law or in connection with legal proceedings (including where we intend to take legal proceedings), or as may be necessary to establish, exercise or defend our legal rights.

Referral Partners

If we have received your details as a referral from one of our partners we may be required by the referral partner to provide them with updates on the following areas:

- Attendance
- Progress
- Achievement/completion
- Outcome/destination
- Withdrawal

Job Centre Plus Referrals

If we or our Service Providers receive your details via a Skills Conditionality Referral from Job Centre Plus we are obliged to keep them informed of your progress. We will complete a Starter/Leaver notification form that contains details of the course being taken, when started and an anticipated end date. You will be asked to sign this to confirm you have started the learning prior to it being sent to Job Centre Plus for processing.

When you stop learning for whatever reason the remaining boxes of the Starter/Leaver notification form are completed and returned to Job Centre Plus. In certain circumstances this may result in sanctions being applied by Job Centre Plus, details of these are available from www.direct.gov.uk.

Keeping you informed

We, and our approved service providers, will use your information to send you regular updates about:

- our services and materials;
- additions to the website; and
- Specific activities such as customer feedback surveys and competitions.

If you enrol on a **GlobeUs Training Ltd** course you will periodically be sent customer feedback surveys. If you do not wish to be contacted for marketing purposes untick the relevant boxes.

We will never use your sensitive personal data for marketing purposes without your express consent.

Funding

We, and our approved service providers, may use your personal data to process or to support any application made for funding associated with your learning. For these purposes we, or our approved service providers, will share the information you supply with the Education and Skills Funding Agency (SFA) in England. The ESFA may in turn share it with the European Social Fund, or other government agencies that may provide funding for your course, including the Welsh Assembly Government for learners who enrol in Welsh centres. We may use a third party service to verify your identity for funding eligibility.

We, or the government agency providing funding for your course, may use your personal data and Learner File to investigate a suspected misuse of public monies or other fraudulent activity by any person relating to your learning activity. In doing so, we, or the government agency providing funding for your course, may disclose your information to other government agencies (e.g. the Department for Work and Pensions) to establish whether there has been any duplication of funding for your course. We may also contact you for the purposes of any such investigation.

SFA Privacy Notice

The SFA requires that we also tell you about its own privacy notice so that you understand how the SFA will use the information that we give them. It says:

"If you want to change your options with the ESFA or the LRS about their contacting you for surveys or research, or to tell you about courses and other learning opportunities, please contact your tutor.

How we use your personal information

The personal information you provide is passed to the Chief Executive of Skills Funding ("the Agency") and, when needed, the Education Funding Agency for England ("the EFA") to meet legal duties under the Apprenticeships, Skills, Children and Learning Act 2009, and for the Agency's Learning Records Service (LRS) to create and maintain a unique learner number (ULN). The information you provide may be shared with other partner organisations for purposes relating to education or training. Further information about use of and access to your personal data, and details of partner organisations are available at:

<http://skillsfundingagency.bis.gov.uk/privacy.htm>

<http://www.education.gov.uk>

<http://www.learningrecordservice.org.uk/documentlibrary/documents/Code+of+Practice+for+Sharing+of+Personal+Information.htm>"

Statistics

We and/or the approved service providers delivering and supporting your learning are also required to provide statistics to all of the government agencies mentioned under the heading 'Funding' and to the Department for Business, Innovation and Skills, in order that they can carry out checks on our funding arrangements and our performance and for research and statistical purposes. This helps us, and our approved service providers, to maintain our funding. Where such information is supplied, it is provided in an aggregated manner so that whilst such authorities may be aware of, for example, the number, geographic location and sex of persons using **GlobeUs Training Ltd**, you cannot be personally identified from this information. However, we may provide information that identifies you (your name, date of birth, address and postcode) to the Department of Work and Pensions so that they can check whether **GlobeUs Training Ltd** learners have progressed into employment and compile statistical information about such progression. You will not be identifiable from the statistical information compiled.

The information collected on Welsh speakers is passed in an aggregate manner to the Welsh Assembly. You cannot be personally identified from this information.

Requests for information

If you have not registered as a learner but are simply making an enquiry or request for information, we will use your personal information to reply to your enquiry or request. We will not use this information for marketing purposes without your permission or unless you invite us to do so.

Protecting your personal information

Even though we take appropriate technical steps to protect your security, you should remember that data transmission over the internet cannot always be guaranteed as 100% secure so you use the website at your own risk.

Breach Notifications

Should personal information be at risk of a breach, or it is found that it has been breached, all GlobeUs Training employees are responsible for reporting as soon as possible. We will report certain types of personal data breach to the relevant supervisory authority within 72 hours of becoming aware of the breach, where feasible. If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we will also inform those individuals without undue delay. We will review our existing procedures to ensure we have robust breach detection, investigation and internal reporting procedures in place. This will facilitate decision-making about whether or not we need to notify the relevant supervisory authority and the affected individuals.

We will also keep a record of any personal data breaches, regardless of whether we have been required to notify relevant authorities. Please refer to <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/> for further information.

For Employees

Personal data breaches may include:

- Access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;

- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.

Please refer to this policy regarding any data breaches and report any concerns directly to your line manager or the Data Protection Officer (Ellen Mould). We will utilise the above link to the ISO website to follow their official guidelines on reporting breaches on a case-by-case basis; however, a basic process will be as such:

1. Gather as much information as possible regarding:
 - What information has been breached;
 - How it has been accessed;
 - By whom;
 - When (including date and time).
2. Report this to the Data Protection Officer immediately via email, who will then contact you via phone to confirm all details and parties involved.

The Data Protection Officer will then advise on:

1. Assess the scope of the data breach including:
 - The likelihood and severity of the resulting risk to people's rights and freedoms;
 - The level/amount of information taken, and to what extent this can be attributed to identify an individual;
 - The severity of the breach and how many it has affected;
 - How it has occurred;
 - If the breach was malicious/deliberate or accidental
2. Try to contain the breach
3. Assess the potential adverse consequences for individuals, based on how serious or substantial these are, and how likely they are to happen.
4. [Report the breach to the ICO.](#)

Recital 85 of the GDPR explains that:

"A personal data breach may, if not addressed in an appropriate and timely manner, result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned."

Keeping your Personal Data

We keep personal data and Learner Files:

- for as long as is necessary to fulfil the purposes we collected it for;
- as required by law; or
- To enforce or defend legal claims.

Sometimes we will keep information that you have deleted, for example messages sent by you to your tutor, as a record of your learning experience. We will keep this information for a reasonable time. All documentation is kept securely either in lockable filing cabinets or in password controlled electronic files.

Erasure

As per ESFA requirements, Apprenticeships data will be stored for 7 years for auditing purposes. After this time period has elapsed, documents will be securely destroyed.

We will periodically archive personal data stored electronically, deleting information 1 year following the closure of a programme; this is for quality purposes with our Awarding Bodies.

Any information not required for audit or quality will be securely destroyed or deleted as soon as the final process has been completed, e.g. deletion of ID documents as soon as a DBS check has come through.

If you are a tutor

When you are registered as a tutor by a Service Provider you accept that all activity is undertaken by you for the provision of GlobeUs Training Ltd learning. Any comments or tutor notes placed by you on the GlobeUs Training Ltd system will be retained, are visible to the relevant learner and authorised personnel within GlobeUs Training Ltd and may be used as evidence of learner support.

Links

Our website contains links to other websites. We are not responsible for the privacy policies of other sites and we advise you to read the privacy statement of every website that collects personal information from you.

Other information

You should note that if our business (or any part of it) is sold or transferred at any time, the information we hold may form part of the assets transferred although will still only be used in accordance with this privacy statement.

How to contact us

To obtain a copy of your personal data, to correct inaccuracies or if you have any queries or concerns about how we handle your personal data, please contact: **GlobeUs Training Ltd**, Unit 25 Basepoint Gosport, Aerodrome Rd, Gosport, Hampshire. PO13 0FQ. Call 01329 848714, or email info@globeustraining.com, asking to speak with the nominated Data Protection Office Ellen Mould.

Issue	Issue Date	Author	Revision Notes
1	01/12/2015	Luke Bailey	1st Issue
2	05/08/2016	Ellen Mould	Policy Revised
3	05/03/2018	Ellen Mould	First revision pre-GDPR
4	21/03/2018	Ellen Mould	Full revision of policy to include GDPR duties.