



REVIEWED BY: Michele Andrews

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REVIEW CYCLE (YEARS): 3 Years (Or if the customer data changes or increases)

NEXT REVIEW DATE: March 2020

PERSON/S RESPONSIBLE:
✓ DPO

PRIVACY POLICY & PROCEDURES

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APPROVED BY:

SIGNATURE:

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1. PURPOSE AND PRINCIPLES

- 1.1 This policy is intended to guide staff and all users involved in our service to explain clearly what we do with any personal data and the rights each user has surrounding it. This is to follow the new GDPR regulations that have come into effect since May 25th, 2018.
- 1.2 The scope of the policy is all about how Primary Goal handled the data on a day to day business and what government bodies access the data. This covers all the different policies and procedures that is involved with personal data.
- 1.3 The new Primary Goal privacy is based on the laws set by the new GDPR regulations that have been enforced since May 25th, 2018. The purpose being to ensure that all our collected data is made aware to our users and that it is clear where personal data is shared to and how we manage it.
- 1.4 All learners must be given the opportunity to become aware of the terms of the Privacy and Policy agreement outlining what we do with all the data we collect.
- 1.5 Exceptions will be considered when handling data subject access requests to make sure that the request does not jeopardise the privacy of others and does not contradict other policies set in place by Primary Goal.
- 1.6 It must be made clear to all the staff members and users of Primary Goal of the extent to which we use personal data within the company. All members will follow the GDPR regulations and additional support or assistance on the subject can be handled by our DPO which Lauren Delday is.

RESPONSIBILITIES

- 1.7 Overall responsibility for making sure Primary Goal follows GDPR regulations falls to Lauren Delday
- 1.8 All Primary Goal staff have responsibility for making sure that all personal data is treated fairly and legally, following the regulations set by the new GDPR law and following policies and procedures set by this document and others in the company.
- 1.9 Any user and staff member are expected to read the privacy policy to ensure that the regulations of GDPR are followed.

2. THE INFORMATION PRIMARY GOAL COLLECTS

2.1 We collect various types of personal data which is used to help identify you and provide support during the apprenticeship programme we offer. This may include but is not limited to:

- Names and contact information such as email addresses and mobile phone numbers
- Individuals characteristics such as ethnicity, nationality, gender
- Personal information such as date of birth, national insurance number
- Educational information (including qualifications, grades and additional learning needs)
- Bank details for staff and apprentices (Including additional financial information)
- Contact information about staff members
- Information about the company relating to employees and finance
- Contact information sent through website contact forms

3. HOW THE INFORMATION IS USED WITHIN THE COMPANY

3.1 The information that we collect is used to allow us to effectively support you using our services to help new recruits find an appropriate placement while also helping ongoing apprentices get the correct amount of support and help they need on programme. Additional reasons on how this information is used is for the following:

- Provide the learner with the educational needs
- Create accounts for use on our systems and websites
- Provide updates on Primary Goal activities and events
- Provide information that you have requested from us
- To help keep you up to date on any future changes to our service
- To comply to agreed contractual requirements with you

4. DATA RETENTION

- 4.1 We make sure at Primary Goal to ensure that the information that is held about you is only held for as long as it is necessary for the purpose in which it was collected in the first place. The length of which we hold the data is required under contract, statistical purposes, subject to appropriate safeguards or by the applicable laws.

5. YOUR RIGHTS

- 5.1 You have the full right to request the details about the information we collect about you as an individual. Any inaccuracies that you know about can be requested to be corrected and objections can be raised to the collection of information. You also have the right to be forgotten for us to delete all information that we hold about you. Under some cases under the law, we may decline to process requests that jeopardise the privacy of others, additional exceptions to the request are listed:

- Learners that are on programme we must hold this data for a minimum of 7 years
- Employees financial records must be held for a minimum of 3 years and personal records for 5 years, Required by the HMRC
- People who never made it past the recruitment stage are held for 6 months
- School contracts need to be held for a minimum of 5 years containing things such as contact numbers, health & safety

- 5.2 You also have the full right to request a copy of all the personal data that we hold about you if you can request the information with the inclusion of a way for us to confirm and verify your identity. We will respond within 30 days of the request and if it does not conflict with the listed exceptions your copy of the personal data will be relayed to you. You also have full right to object to the processing of your personal data in regard to us not having any legal reason to process that data that is not already outlined in this policy. If the objection is legitimate you then have full right to restrict the right for us to process the objection of that data.

If you would like to make such a request then please contact privacy@primarygoal.ac.uk to begin a subject access request or if you would like further information on your rights as a member of Primary Goal feel free to contact our Data Protection Officer, Lauren Delday at lauren.delday@primarygoal.ac.uk. Please also note that GDPR will restrict us in some ways of complying with your request, if this is the case we will explain to you in full in our response.

6. WHO DO WE SHARE PERSONAL DATA WITH

- 6.1 To maintain our integrity and keep providing apprenticeships we must by law share personal data with relevant third parties, where necessary which is only in relations to your learning, certifications and assessments. These include parties such as BCS, OFSTED, ESFA and any sub-contractors affiliated with Primary Goal. If the apprentice is enrolled with a subcontractor agreement, then the details of the apprentice will be shared with the main provider. Any of Primary Goal's partners and legal experts will have access to this data to be used for the appropriate reasons in law or marketing.

7. RECORD KEEPING

- 7.1 We keep records of all different type of data we collect in the organisation and record when data is sent off to the appropriate third-party members
- 7.2 A DPO will be made aware of all personal documents that are being used within the organisation
- 7.3 Processes and services which involve the collection of personal data is all recorded and stored in the appropriate areas on our exchange servers to prevent unauthorised access to the areas and allow us to remove the data from our systems when necessary.

8. CONTACT

- 8.1 If you have any further questions or uncertainties about this policy or in the way that Primary Goal handles and processes your personal data or would like to exercise your rights detailed above then feel free to contact us at privacy@primarygoal.ac.uk or on 02476 791116

9. COMPLAINTS & ISSUES

- 9.1 If you feel that your personal data protection rights have been broken and we have not taken the appropriate steps to consolidate your requests, you may file a complaint with the appropriate supervisory authority to seek further remedy. Visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the ICO.

10. REVIEW OF POLICY

- 11.1 The above policy will be reviewed by the relevant parties after a period of three years or as required.
- 11.2 Any changes that are made to the policy will be made available here and where appropriate will be notified to you by email.