

Privacy Policy





Contents

1. Introduction	3
2. Who are we?	3
3. Web Browser Cookies	3
4. What personal data do we collect?	3
5. Information you provide us	4
6. Information we receive from other sources	5
7. Information about other people	5
8. Sensitive personal data	5
9. Legitimate Interests	5
10. Contract performance	5
11. Legitimate interests	5
12. Consent	6
13. Where required by law	6
14. Who do we share personal data with?	6
15. Data sharing agreements	6
16. How long will we keep your personal data?	7
17. Where do we store your personal data and how is it protected?	7
18. Your rights	7
19. Contact	8
20. Complaints	8
21. Changes to our policy	9
22. Monitor and review processes	9

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1. Introduction

Aspiration Training Ltd is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679. Please read this policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

2. Who are we?

Aspiration Training Ltd provides opportunities for young people and adults to learn new skills and gain qualifications, we have offices in both England and Wales (Company registration no 04551344) registered address is C/o Gateley Plc, Park View House, 58 The Ropewalk, Nottingham, Nottinghamshire, NG1 5DW.

For the purposes of GDPR, Aspiration Training Ltd is the 'data processor & data controller' of the personal data you provide to us or one of our associated companies.

If you have any queries about this policy, the way in which Aspiration Training Ltd processes personal data, or about exercising any of your rights, please send an email to dpo@aspirationtraining.com or write to Data Protection, Aspiration Training Ltd, Redditch: Suite 9B, Floor 4, Grosvenor House, Prospect Hill, Redditch, B97 4DQ.

Aspiration Training Ltd owns and operates www.aspirationtraining.com. This policy, together with our website terms of use and any other documents referred to in them, sets out the basis on which Aspiration Training Ltd processes personal data.

3. Web browser cookies

Our website may use "cookies" to enhance user experience. User's web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. User may choose to set their web browser to refuse cookies, or to alert you when cookies are being sent. If they do so, note that some parts of the website may not function properly.

4. What personal data do we collect?

We may collect and process personal data which includes your name, date of birth, contact details, ethnicity, learning difficulties/disabilities, health information, next of kin and employment status. We may also need to collect your qualifications on entry, English and mathematics diagnostics and information on learning styles that will help us provide the right learning environment for you. We also need to record any criminal convictions but this will be treated confidentially.

We will only collect bank details from our employers in relation to contributions to the cost of the course and from our learners if they are in receipt of a care bursary.

Information you provide to us if you:

- Complete a form on our website;
- Submit a CV/application form;
- Complete a survey;
- Correspond with us by phone, e-mail, social media or in writing;
- Report a problem;
- Sign up to receive our communications;
- Enter into a contract with us to receive products and/or services.

Once you are enrolled with Aspiration training we will also need to collect information on your progress as part of your Individual Learning Plan (ILP). This will include information relating to attendance, support needs and targets/predicted grades. If you are an apprentice or traineeship learner, some of your personal information will be imported into our ePortfolio system, called Smart Assessor, which we use to record all of your skills, learning, progress and achievements. The information in here is only shared with your employer and external moderators from Awarding Organisations. If you are undertaking a distance learning online course, then some of your personal information will be imported into our eLearning system, called EQUAL, which we use to record your learning, upload work and feedback, log any communications and record achievements.

If you apply for a vacancy with us, the organisation may collect personal data about you from third parties such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

We may collect your name, e-mail address, postal address, telephone number and job role.

If you visit our website, we may automatically collect the following information:

Technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

Information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction Information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

5. Information you provide us

The information you provide in your enrolment pack allows us to ensure you are eligible for funding as well as giving us the information we need to offer you the most appropriate learning package. It's important that all mandatory information on our paperwork is recorded accurately so we can ensure we only claim the correct funding entitlement for your learning.

Induction information, diagnostics and on-going learning plans also help us to build a picture of your starting point, any support requirements and gives us the ability to monitor progression effectively. Whilst you are in learning we will also maintain records on health and safety, attendance, work placements, registrations with awarding bodies to allow us to enter you for your exams, produce a support plan if needed, or submit an exam or coursework assessment. A lot of the information about progression, tracking and achievements is also used to develop our teaching and assessment practices going forward.

6. Information we receive from other services

We may also receive information about you if you use any of the other websites we operate or the other services we provide.

7. Information about other people

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

8. Sensitive personal data

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, religious beliefs, physical or mental health. However, we will only do so on the basis of your explicit consent.

9. How do we use your personal data?

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

10. Contract performance:

We may use your personal data to fulfil a contract, or take steps linked to a contract:

- To provide the products and/or services to you; (apprenticeship program);
- To communicate with you in relation to the provision of the contracted products and services;
- To provide you with administrative support such as account creation, security, and responding to issues; and
- Provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

11. Legitimate interests:

Where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

- Providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by a member of the Aspiration Training Group which may be of interest to you;
- Communicating with you in relation to any issues, complaints, or disputes;
- Improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website;
- Performing analytics on sales/marketing data, determining the effectiveness of promotional campaign.

NOTE: You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading 'Your rights'.

12. Consent:

Where you have given your express consent to receive marketing communications, we may use your personal data to:

Send you newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by a member of the Aspiration Training Group which may be of interest to you;

Developing, improving, and delivering marketing and advertising for products and services offered by a member of the Aspiration Training Group.

13. Where required by law:

We may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

14. Who do we share your personal data with?

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business or legal need to know it.

15. Data sharing agreements

Aspiration Training 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 they will 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.

We may also share your personal data with trusted third parties including:

Legal and other professional advisers, consultants, and professional experts;

Service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services, EPA providers, BKSB, RIDDOR in instances related to Health and Safety, Job centres and Careers advisors

Analytics and search engine providers that assist us in the improvement and optimization of our Website.

Education and Skills Funding Agency (ESFA) and the Department for Education (DfE)

The Learning Records Service (LRS) on your behalf to access any existing learning records and achievements, or create you a new unique learner number (ULN) so that data can be shared.

For all traineeship learners we have a duty to inform the local authority of your enrolments, or any subsequent withdrawals that may occur. As part of the same legal duty we may share data relating to progression choices and destinations with the relevant local authorities as requested.

Aspiration does not store or transfer your personal data outside Europe or EEA countries.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them. Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws. We will share personal data with law enforcement or other authorities if required by applicable law.

16. How long will we keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of 10 years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

For detailed information about all our document retention periods please refer to our 'Retention and Destruction Policy' or email the DPO for a copy of our Information Asset Register.

17. Where do we store your personal data and how is it protected?

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. Where you have a username or password (or other identification information) which enables you to access certain services or parts of our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access.

18. Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate, or if any changes need to be made, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

19. Contact

If you have any queries about this Policy, the way in which Aspiration Training processes personal data, or about exercising any of your rights, please send an email to dpo@aspirationtraining.com or write to Data Protection, Aspiration Training Limited, Redditch: Suite 9B, Floor 4, Grosvenor House, Prospect Hill, Redditch, B97 4DL .

20. Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern through our Complaints, Compliments and Comments policy and procedure, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

21. Changes to our policy

Any changes we may make to our policy in the future will be communicated to all current learners and members of staff. The current version of this policy will be hosted on our website.

22. Monitor and review processes:

This policy will be reviewed on an annual basis, or when statutory guidance changes, to ensure it continues to meet the needs of the organisation and its stakeholders. The review will be conducted by the Aspiration Training Operational Board of Directors.

Contact information:

Data Protection Officer:	Lee Wilkinson
Email:	dpo@aspirationtraining.com
In writing:	Data Protection, Aspiration Training Ltd, Redditch: Suite 9B, Floor 4, Grosvenor House, Prospect Hill, Redditch, B97 4DQ.