

Privacy Notice

The following information is provided to inform you of what to expect when **Nurture Training and Development** collects personal information about you. It applies to information we collect about:

- Individuals and organisations who use and/or enquire about our services
- visitors to our website
- Job applicants
- Job advertisements
- Enrolment enquires
- Registration details
- Employers' registration details
- Training Providers registration details
- Assessors and IQAs

1. What is data protection?

The (GDPR) General Data Protection Regulation (2018) and Data Protection Act (2018) sets out rules for processing personal information we hold about you. This states that those who record and use personal information must ensure that it is handled properly. We are required to ensure that personal information is:

- processed in a lawful, fair and transparent way
- held only for the purposes we collected it for
- adequate, relevant and limited to what is necessary
- accurate
- held only for as long as we need it
- kept secure

The regulation also allows you to find out what personal information is held about you. The Information Commissioner's Office (ICO) is responsible for regulating, enforcing, and promoting good practice and transparency in the access and use of personal information.

Our priority is compliance with the General Data Protection Regulation. Evidence of our commitment is our continuous registration with the **Information Commissioners Office (ICO)** ZA556326.

You can find more information online at www.ico.org.uk

2. What personal information does Nurture Training and Development collect?

We begin the process of collecting information about you when you or your employer enquire about training and development opportunities. Although the information we collect may vary, typically it may include:

- name and address
- contact details and contact preferences
- educational information, including qualifications and support needs
- employment details and work experience
- DBS (Disclosure Barring Service) information, which may include details of criminal convictions
- bank account details (for subscription purposes and to those which it applies)
- change of name documentation, i.e. marriage certificates
- performance on programme of study, individual achievements, attendance and results
- Continuous Professional Development (CPD)
- Evidence of knowledge, skills and competences

Nurture also collects diversity data, including:

- age
- gender
- race or ethnic origin
- health, disability and medical conditions
- religion
- sexual orientation

3. How we collect information about you

We collect information in a variety of ways, including:

- when learners contact us directly
- when employers contact us on behalf of learners

4. Why does Nurture collect this information?

Nurture processes your personal data in order to manage enrolment.

Nurture collects this information for a number of reasons, including:

- to manage the assessment practices and processes
- to support you in your learning journey
- to engage with learners and employers to get feedback on our services
- to monitor diversity and equality
- for regulatory and contractual purposes
- for legal requirements

5. Sharing your information

We will not share your personal information without your consent, unless allowed by law. Examples of organisations we may share your information with, where appropriate, include:

- your employer
- IQAs
- assessors
- your work placement provider or delivery partner
- Ofqual or other EQA Provider
- funding body (Education and Skills Funding Agency - ESFA)*
- awarding organisations

*For further information on how the ESFA uses your personal information, please see a copy of their Privacy Notice at <https://www.gov.uk/government/publications/esfa-privacy-notice>

Nurture will ensure that all learners receive a copy of the ESFA privacy notice as part of their enrolment process, if this route has been selected and used.

6. What is the legal basis for our use of your personal information?

Nurture to process your personal data in order to manage your learning journey.

This includes but is not limited to the following articles as set out within GDPR regulation

- Article 6.1(a) – the data subject has given consent
- Article 6.1(b) – processing is necessary for the performance of a contract
- Article 6.1(c) – processing is necessary for compliance with a legal obligation
- Article 6.1(d) – processing is necessary to protect the vital interests of individuals
- Article 6.1(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

For the processing of “special category data” such as someone’s physical and mental health:

Article 9.2(g) of GDPR

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

The processing of special category under Article 9 also requires the following conditions for processing from the UK Data Protection Act 2018 to be met:

- Schedule 1, Part 2 section 6(a), processing is met under the exercise of a function conferred on a person by an enactment

- Schedule 1, Part 1 section 2(1), this condition is met if the processing is necessary for health and social care purposes

7. How long do we keep your personal information?

All of your information, correspondence and notes about your learning will be held in our secure systems, and some information might be kept within our secure email and IT systems.

We keep your information for up to seven years following the end of your learning journey.

All personal data is securely destroyed when no longer required. Electronic files are deleted in such a way that they cannot be retrieved, and all paper records are disposed of in confidential shredding bins.

8. How do we take care of your personal information?

Information is held either in a digital format or as hard copies under lock and key. Not all members of staff are able to access this information, only those who have authorisation to do so. We use the information to deliver a service to you. There may be occasions when we have to share information with others (detailed in section 5) to enable us to deliver our services and fulfil our legal and contractual obligations. If information is shared with other organisations, we will ensure Information Sharing Agreements are in place.

We are legally required to share information in the following circumstances:

- safeguarding
- prevention or detection of crime
- apprehension or prosecution of offenders
- in connection with legal proceedings
- to comply with the law.
- Public Health

9. Importance of accuracy

During the course of your learning journey, your needs may change, as such we will update our information to make sure we can provide services that meet your needs.

If any of the information we send is incorrect or inaccurate, please tell us so we can make the necessary changes. Any new information will be protected in the ways already outlined.

10. Marketing and Communication

10.1 The Marketing and Communication Team may collect the following types of personal data:

- Images
- Video footage including interviews

We may also collect:

- Your name, age, address and contact details (email, telephone number and/or postal address).
- Name of group/organisation or event.
- If it is for consent for a child aged 13 or under, or a vulnerable adult - the name of the consenter and their relationship to you.

10.2 We may collect your personal data in a number of ways:

- Through a consent form
- By an authorised representative e.g. employed photographer at organised events

10.3 What is our lawful basis to obtain and use this personal data?

When we collect and use your personal information we rely on the following lawful basis:

- Consent: You or a representative have given consent.
- Legitimate interest – processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

10.4 What does the communications and marketing team use your information for?

We use images to promote services across Nurture Group.

Images and footage may be published on any of the following channels:

- Press and media (including newspapers, magazines, websites)
- On our websites (Nurture Training and Development)
- On our social media feeds including LinkedIn, Twitter, Facebook and other corporate social media accounts in the future
- In our printed publications such as newsletters, brochures, flyers and display materials
- In our electronic newsletters
- Media releases

The images/footage will often be accompanied by the details of your story, however, we will not use personal details or full name of any individual in an article, unless permitted.

If you no longer wish for your image or personal information to be used, please contact us and ask us to remove them from the archive. **Please note that we will be unable to remove any images or**

content in printed materials or video footage if it has already been produced or remove images and quotes that have already been published by the media.

11. Visitors to our websites

When someone visits www.nurturetraining.org, we use third party services, Google Analytics, to collect standard internet log information and details of visitor behaves and patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

You may prevent your data from being analysed by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. To learn more about how Google collects and processes data in connection with Google Analytics, visit <http://www.google.com/policies/privacy/partners/>

We use Google Analytics for trend reporting and visitor behaviour to help us improve our website and search functionality.

12. Security and performance of Nurture Training and Development website.

Nurture a third-party service to help maintain the security and performance of Nurture. To deliver this service, it processes the IP addresses of visitors to Nurture. This information is not used for identifying purposes, except for investigation if an intrusion occurs.

12.1 Use of cookies by Nurture

Nurture uses cookies. Cookies are small text files placed on your computer by the websites you visit. They are used to help make websites work efficiently. You can control cookies through the settings of your web browser. To find out more, visit www.aboutcookies.org or www.allaboutcookies.org.

These are the cookies we use:

- Google Analytics - to monitor website use and the type of browser that is accessing the website

13. People who contact us via social media

If you send us a private or direct message via social media, the message will not be shared with any other organisations.

14. People who email us

Nurture is encrypted at rest and in transit, using several strong encryption protocols and technologies that include password protection.

15. What are your rights

15.1 Right of access to your data

If we hold personal information about you, you have the right to ask us:

- what we use the information for
- to provide you with a copy of the information you are entitled to
- to supply you with details of the purposes for which we use the information and who it is shared with
- for incorrect information to be corrected.

This can be requested either verbally or by emailing drichards@nurturetraining.org

We have one month from the date we receive your request to provide you with the information.

15.2 Right to rectification

If you think that Nurture holding incorrect personal information about you, you have the right to have this personal information amended, you can do this by emailing drichards@nurturetraining.org

Once you have advised Nurture the details of the incorrect data and the required amendments, your data will be updated within 30 days. If your personal data cannot be amended, Nurture advise you in writing why this is the case.

15.3 Right to be forgotten

You have the right to have your personal information erased if it is no longer required to manage your enquiry.

15.4 Right to restriction of processing

You have the right to restrict the processing of your personal data if it is no longer required to manage your learning journey. This means that Nurture cannot further process your data, for example, we cannot share your data with a third party.

15.5 Right to data portability

You have the right to have your personal data transferred to another data controller. For example, if you move employer and continue with your training, Nurture will transfer your data to your new employer.

15.6 Right to object

You have the right to object to the processing of your personal information if the data is not required to manage your learning journey or enquiry, or you have not given Nurture to process your data, for example, for direct marketing.

16. Job applicants

Nurture the data controller for the information you provide during the employment recruitment process. If you have any queries about the process or how we handle your information, please contact us.

The following explains how Nurture uses the information you provide in your application, along with your rights, reasons for requesting it and who will have access to it.

16.1 What information does Nurture collect?

Nurture information the following information as part of the application process:

- Name, address, email, telephone number
- CV (if applicable)
- Equal opportunities monitoring information (defined as special categories data) - this information is purely for statistical analysis and monitoring purposes
- Answers to application questions
- Any other information you wish to provide in support of your application.

16.2 Why do they collect this information and who do they share it with?

Nurture collects your details and information so that they can assess your suitability for employment with us and carry out statistical analysis. Statistics will be shared with External Quality Assurance Organisations Information you provide as part of your registration will be:

- Held on Nurture systems and may be downloaded by us
- Used to deal with your application
- Made available to Nurture and their processors
- Used for communication with you regarding the vacancy
- Used to satisfy legal requirements
- Used for statistical analysis
- Held and may be used to contact you about other vacancies.

16.3 How can you access the information we hold about you?

You can access policy and procedures in relation to your enquires by visiting <https://www.nurturetraining.org/> you can also email dichards@nurturetraining.org

You have the following rights in relation to the way in which we deal with your personal data:

- the right of erasure or to be forgotten
- the right to rectification if information is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object to Nurture your personal data
- the right to withdraw your consent with regards to the handling of your personal data
- you have the right to ask for a copy of the information we hold about you (Subject Access Request)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Where you exercise your right to object or withdraw your consent, we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

16.4 Freelance

We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. We do this by requesting information such as Identification; we will not share the information with any third parties.

You will therefore be required to provide:

- Proof of your eligibility to work in the UK – you will be asked to upload to your profile with original documents as evidence.

- Proof of your qualifications.
- You may be asked to complete a DBS application to declare any unspent convictions, depending on the nature of the role you apply for.
- Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest. If you complete a declaration, the information will be held by our Business Assurance Team.

16.5 Health management

If for any reason you are able to work for any reason, you are responsible to inform other parties involved at the earliest convince. No data about absence or no show will be recorded by Nurture about you. For further information you can access the terms and conditions by visiting <https://www.nurturetraining.org>

17. Complaints or queries

Nurture aims to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Nurture's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact us on 07810640128

You can also make a complaint in writing to:

Debbie Richards
Millennium Centre
St Helens
Merseyside
WA10 1HJ

18. Changes to this privacy notice

We keep our privacy notice under regular review.

This privacy notice was developed July 2020.

This privacy notice was reviewed August 2022.