

Norpro Training Ltd is committed to protecting your privacy and promise to collect, process and share your data safely and securely when you submit data to us. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller.

Our Privacy Promise

Transparency – We will always tell you what data we’re collecting about you and how we use it. We only share your data with trusted partners and will never sell your data.

Secure – We are committed to always follow industry best practices to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

Control – We will always give you control over the communication and notification you receive from us. You can choose the types of information you receive and whether you want to stop receiving communications.

Our Privacy Policy

For Apprenticeships and Traineeships

Learner data for Apprenticeships and Traineeships is collected by Norpro Training Ltd in accordance with the terms and conditions of funding contracts imposed by the Education and Skills Funding Agency (ESFA)

<https://www.gov.uk/government/organisations/education0-andskills-funding-agency>

Information we collect about you

- Personal and contact information when you complete an online application form including your name, address, email address, national insurance number, telephone number(s), title, date of birth, gender, ethnicity, learning support information including assessments, learning difficulty and/or disabilities, next of kin contact details, work experience and employment details, allergies and smoking preferences, residency information including rights and permits to work in the United Kingdom and previous education information such as exam results, name of school and course preferences along with security question answers, for example town of birth and mother’s maiden name.
- Details (and copies) of your communications and interactions with us including by email, telephone, post, SMS/Text and via OneFile including e-logbook.
- A form of identification such as national insurance, birth certificate or driving licence. Copies of identification documents will only be taken in the circumstance of a change of name or to verify your right to work in the United Kingdom, for example where a work permit is required.
- Technical information about your device or browser when you use our application site, OneFile including e-logbook or website, including geolocation data to determine what country you are accessing our online platforms, your internet protocol (IP) address, device ID, browser type and version and time zone setting, which may in some circumstances be personal data.
- We may also receive personal data directly from you or from various third parties and government sources, including the Personal Learning Record Service, National Apprenticeship Service and social media channels (if you interact with us through those channels) and other third parties such as job centres or Learning Partnership West.
- We may also collect information about you from the Personal Learning Record’s service. Information held in the Personal Learning record is controlled by the Education and Skills Funding Agency. Further details of how this personal data is processed and controlled are published for the Learning Records Service
<https://www.gov.uk/government/publications/learning-records-service-the-plr-for-learners-andparents>



For short courses (IMI Accreditation, City & Guilds Accreditation & ABC)

Applicant data for short courses is collected by Norpro Training Ltd in accordance with the terms and conditions of training contract imposed by the Institute of the Motor Industry (for [IMI accreditation](#)) City & Guilds ([C&G accreditation](#))

Information we collect about you

- Personal and contact information when you complete an online or paper application form including your name, address, email address, date of birth, learning difficulties and disabilities, employment details, prior learning and technical skill information
- We may take your photograph for your Accreditation Licence (dependant on your short course and if it is achieved) and for invigilation of exams.
- Details (and copies) of your communications and interactions with us including by email, telephone and post
- Copy of your driving licence where necessary
- Technical information about your device or browser when you use our website, including geolocation data to determine what country you are accessing our online platforms, your internet protocol (IP) address, device ID, browser type and version and time zone setting, which may in some circumstances be personal data.
- We may also receive personal data directly from you or from various third parties and government sources, including from Institute for the Motor Industry and City and Guilds London Institute.

How and why we use your personal data

In the table below, we set out all of the ways we use your personal data, and why. We have also identified what our legitimate interests are where appropriate.

It is sometimes necessary for us to process your personal data in order to enter into a contract with you, or to satisfy a contractual requirement, or to comply with a statutory requirement. In those circumstances, if you do not provide the personal data we require, we will be unable to provide training to you.

Reason for Data	How we use your personal data	Why we use your personal data	Retention Period
Individualised Learning Record (ILR)	For apprenticeships and traineeships, we use your personal details to create an ILR in order to generate funding for your course. Some identifiable details such as your Unique Learner Number, date of birth, current and pre-enrolment home postcode and course information is uploaded monthly to the ESFA via their secure website.	Necessary for compliance with a legal and contractual obligation	Minimum period of 6 years but up to 2030 for ESF Match records)
Registration - apprenticeships and traineeships	We use your personal and contact information to register you for the course, set up your e-logbook/portfolio account, and components of the course, you have applied for and enrolled on.	Necessary for delivery of your training in line with contract with you, your employer and the contract enforcer.	Duration of programme



Registration - short courses	We use your personal and contact information to register you for the course on an external platform hosted by the Awarding Organisation.	Necessary for delivery of your training in line with contract with you, your employer and the contract enforcer.	Duration of training
Eligibility	For apprenticeships and traineeships, we use your personal details to identify eligibility for funding and right to work in the United Kingdom	Necessary for compliance with a legal and contractual obligation	Minimum period of 6 years but up to 2030 for ESF Match records)
	For short courses, we use your personal details to identify eligibility for training.		Minimum period of 3 years
Verification	We may require to view original documents relating to your identity, residency and right to work in the United Kingdom. We may take copies of your driving licence for the purpose of processing an application to a short course, where this takes place it will be details in the documentation supplied to you.	Necessary for compliance with a legal and contractual obligation	Minimum period of 6 years (but up to 2030 for ESF Match records)
Learner and Learning Support	We use your personal details to assess and put in place a learner and learning support plan.	Necessary for delivery of your training in line with contract with you, your employer and the contract enforcer.	Minimum period of 6 years (but up to 2030 for ESF Match records)

Photographs	For apprenticeship and traineeships, we take your photograph to generate your Academy Learner Entry Card	Necessary for security, learner and staff welfare	Duration of programme.
	For some short courses, we take your photograph to generate your Accreditation licence	Necessary for compliance with a legal and contractual obligation	Duration of programme
Delivery of Training	For apprenticeships and traineeships, we use your personal details to create a Individual Learning Plan. We also use your personal details to contact you regarding: training block dates, travel and accommodation details, learning progress and exam and assessment results.	Necessary for delivery of your training in line with contract with you, your employer and the contract enforcer.	Minimum period of 6 years (but up to 2030 for ESF Match records)
	For short courses, we use your personal details to record the correct, applied for, training course. We also use your personal details to confirm course dates and training and assessment outcomes.	Necessary for delivery of your training in line with contract with you, your employer and the contract enforcer.	Minimum period of 3 years



Travel and Accommodation	For apprenticeships, we may use limited personal information (name, age, gender, allergies and smoking information) to assign appropriate accommodation. We may also use your banking information to pay learner travel claims where eligible.	Necessary for our legitimate interests (to respond to you and to deal with any request you may have).	3 months. For banking and invoice information, 6 years.
Payments and Funding	For apprenticeships and traineeships, we use your personal data to generate funding for your course.	Necessary for compliance with a legal and contractual obligation	Minimum period of 6 years (but up to 2030 for ESF Match records)
	For short courses, we use your personal details to raise Invoices and process payments in associate with your course.		Minimum period of 6 years
Learner Welfare and Safeguarding	For apprenticeship and traineeships, we may use your personal information, recorded discussions and information relating to any learner welfare or safeguarding concerns.	Necessary for staff and learner safety	Duration of programme.
Fraud prevention and cheating	We may use your personal and contact	Necessary to comply with a legal obligation.	Duration of training/programme.
	information, financial information, information about any transaction between you and us, information about your use of online platforms, or technical information, in order to undertake analysis for the purposes of identifying and dealing with any fraud, cheating or fraudulent activity.	Necessary for our legitimate interests (to ensure that transactions and interactions with us are not fraudulent).	
Queries	We may use your personal and contact information, financial information, information about any transaction between you and us, information about your use of the app or website, or technical information for the purpose of dealing with any request, complaint or query from you.	Necessary to comply with a legal obligation.	Duration of training/programme.
		Necessary for our legitimate interests (to respond to you and to deal with any request you may have).	

How we use your personal data for marketing

You will receive direct marketing (new courses and progression routes) by email if you have completed an application form, completed a contact form on our website and have either consented to receive such marketing during registration, and/or have not asked us to stop sending direct marketing by email to you.

Apprentice and trainee learners, you can also:

- contact/speak to your assessor or lecturer

Please note that our systems may take up to 72 hours to update after changing your marketing consent.

How we share your data with third parties

For Apprenticeships and Traineeships

Data collected about you is recorded on an Individualised Learner Record (ILR). The data entered by us is then submitted to and processed by the Education and Skills Funding Agency. The specification and standards for the ILR are published for each academic year (1 August – 31 July) by the ESFA. To review the ESFA Privacy Notice, <https://www.gov.uk/government/publications/esfa-privacy-notice>

We may also share some of your personal details and course information with our delivery subcontractors. Our delivery subcontractors are approved by Norpro Training Ltd and agreed by your employer and such sharing is undertaken using a Service Level agreement for specified legitimate and restricted purposes. Your learning agreement/commitment statement will identify the delivery subcontractor; where it is not listed Norpro Training Ltd will not share your personal details and course information with them.

In some cases, we may also share your personal details with the Police, Local Authority and/or protection services where we have Safeguarding concerns.

Data may also be shared with the European Social Fund (ESF) where you have given consent to us to do so.

Data may also be shared with other bodies such as Awarding Organisations, Assessment Organisations, Apprenticeship Service and Apprenticeship Certification England to carry out process of funding, registration, examination and certification of your chosen course.

For short courses (IMI Accreditation, City & Guilds Accreditation & ABC)

Data collected about you is registered on the Awarding Organisation's website. The data entered by us is then submitted to and processed by either the Institute of the Motor Industry and/or City and Guilds London Institute

How we protect your personal data

We have put various measures in place to protect your personal data:

- We are independently certified to a number of industry recognised standards which helps us maintain the highest levels of security across our entire business.
- Our online security controls maintain confidentiality at all times, specifically for secure card payments.
- Our entire OneFile system is accessed using https rather than http, meaning that all information that is sent and received is encrypted for additional security. You can see this in the address bar of your browser.
- As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however, in some instances we may be compelled by law to disclose your personal data to a third party, and have limited control over how it is protected by that party.

We will not process your personal data outside the European Economic Area (EEA). However, for data processed by third parties where they are the data controller, your data may be shared outside of the European Economic Area (EEA).

How long we keep your personal data

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you may be entitled to ask us to delete your data: see 'Your rights' below for further information.

Your rights

You have the right:

- to ask us not to use your personal data for direct marketing. See further information on how to do this please refer to above section **How to opt out of direct marketing**
- to ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing;
- to request from us access to personal information held about you (see below);
- to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- to ask that we stop any consent-based processing of your personal data after you withdraw that consent;
- to ask, in certain circumstances, to delete the personal data we hold about you;
- to ask, in certain circumstances, for the processing of that information to be restricted; and to ask, in certain circumstances, for data portability.

Contact us

If you have any questions about our Privacy Policy, including any requests to exercise your rights, please contact the **Data Protection Team** using the details set out below:

By post to:

Norpro Training Ltd
30 Ham Drive
North Prospect
Plymouth
Devon
PL2 2NL

By email to:

norprotraining@gmail.com

In order to request a copy of the personal data that Norpro Training Ltd holds about you, please send your request in writing to the Data Protection Team at the above address. To enable us to verify your identity and process your request, you must include all of the following information and documentation with your request:

- your full name;
- the email address registered to your account;
- a description of the data that you are requesting, including a date range;
- a copy of your current and valid photo ID (e.g. passport photo page);
- proof of your address in the form of a photocopy of a utilities or service provider bill; and the date of the request.

If you are unhappy with our processing of your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO's contact details are available here:

<https://ico.org.uk/concerns/>. We would, however, appreciate the chance to deal with any concerns before you approach the ICO, so please contact the Data Protection Team by email in the first instance.

Policy Effective Date: 25 May 2018

Next Review date: 25 July 2018