

Skills Development Privacy Notice

Who we are

The Wise Group has a wide offering of skills and training courses available to customers, both accredited and unaccredited. We are the data controller for the information you provide to us in relation to skills development and training, unless otherwise stated. This means that we are responsible for determining the purposes and means of personal data processing. We will process your information lawfully and securely and in accordance with [Regulation \(EU\) 2016/679](#) (General Data Protection Regulation – GDPR) and [Data Protection Act 2018](#) (DPA18).

Personal data

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). The personal information we collect about you may vary depending on the requirements of each course and those of the relevant awarding body (if applicable).

Generally we collect the following information about you:

- Personal details (e.g. name, National Insurance number, gender, date of birth, address, and contact details including phone number and email address).
- Details about your course of learning (e.g. details of the course, attendance and participation, course work and any tests or examinations and results).
- Information about the funding or payments of your course, including any subsidies or access to government funds. For some courses funded by the government, such as Individual Training Accounts, we may have to ask you for information about your income (e.g. details about what you earn or benefits you claim) to make sure you meet the eligibility criteria.
- Information about your perception of and satisfaction with the learning experience.
- If you are registering on a course which requires photographic identification, such as CSCS or SIA, we may take a photograph of you to produce the required

identification. We do not keep copies of the photographs taken for this purpose.

- We may take pictures or short videos of our courses and course attendees for publication on our website and social media accounts. You will be asked for your explicit consent to use your image for this purpose. You are under no obligation to give your consent for this and you can withdraw your consent at any time.
- 'Special category' data which is more sensitive. We may ask you for health information including disabilities, or your ethnicity. You will be asked for your consent before we collect or process any such information and you can choose not to answer if you prefer.

Purpose of personal data processing

We require your personal information to be able to deliver the training provision to you, including records of your participation and attendance and achievements. We may also use it to:

- communicate with you and provide details of our services
- arrange, cancel or reschedule appointments such as training courses and examinations
- otherwise manage our relationship with you
- determine if any adjustments are required to ensure accessibility
- request your participation in surveys, case studies, and other evaluation and service improvement activities
- monitor the performance and impact of our services
- monitor diversity and equal opportunities
- publicise the service
- report the performance of the service internally and to relevant third parties
- share with other Wise Group services or other organisations that can provide additional support to help you meet your goals or improve your personal circumstances (relevant to your training needs)

The lawful grounds for the processing

- *Consent* – if you agree to the specific data processing activities described above you will be asked to provide your con-

sent. In most cases this will be done in writing or captured electronically but in some instances we may ask for your consent verbally. Your consent is freely given, but we may not be able to deliver the service to you without it. You have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

- **Legitimate Interests** – We may rely on the Legitimate Interests of the Wise Group (or those of a third party) to use your personal data to inform you of additional support services available to you through the Wise Group to enhance the support provided to you. Legitimate Interest means our interest in conducting and managing our activities and projects to enable us to give you the best service and experience. We consider and examine any potential impact on you and your rights before we process your personal data for our legitimate interests to ensure that those interests do not override your interests and fundamental rights. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

How do we collect your data?

We collect information from you directly. If you have been referred to us from another organisation, agency or authority they may provide us with basic information such as your name, contact details and the course you are interested in.

How long do we keep your data?

We will only keep your personal data for as long as is required for any legal and audit purposes. Your registration forms and learner agreements will be retained for 7 years. Where we have gathered other information about you for a specific funder or awarding body we abide by their retention timescales. Once the retention period has lapsed we will completely and irreversibly erase your personal data, unless we are required by law to do otherwise.

Sharing your personal data

We will share your personal data with third parties where required by law, where it is necessary to administer our relationship with you

or where we have another relevant, carefully assessed legitimate interest in doing so.

Personal information held by the Wise Group may be shared with government organisations and departments to enable them to exercise their statutory duties as required by law.

We will not disclose your personal information to third parties unless there is a lawful ground for this. We will not share your personal information for marketing purposes unless you consent to this processing. The third parties your information may be shared with include:

- Organisations who provide funding for audit and monitoring purposes – this may include your employer, government agencies and their non-departmental bodies (such as Skills Development Scotland).
- Awarding bodies for the purposes of registration, examination and certification.
- Contracted third parties who support us in delivering the learning journey, including the internal verification of course work, assessments and examinations.

From time to time we may provide you with links to other websites. These websites are not under our control and as a result, we will not be liable to you for any issues arising in connection with their use of your personal data, the website content or the services offered to you. You should exercise caution and look at the privacy statement applicable to the website in question.

Additional information

For more information about our commitment to data protection, your rights under data protection law, our fees policy or how to contact our Data Protection Officer please read our Privacy Notice Supporting Information:

<https://www.thewisegroup.co.uk/wp-content/uploads/2019/04/QCS009-Privacy-Notice-Supporting-Information-v1-April-2019.pdf>.

About this privacy notice

We keep our privacy notices under regular review. This notice was last updated in June 2020. This notice does not form part of any contract of employment or another contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably possible. We want to hear from you and keep your data safe, accurate and complete. Please keep us informed about any changes regarding your personal data during your relationship with us.