

Data Protection Policy

The Data Protection Act 1998 ('Act') places obligations on those that control and process information relating to individuals.

This policy is provided to draw attention to the different types of personal or sensitive data which may be collected by us.

Definition of Personal Data and Sensitive Personal Data

Data refers to information about an individual (referred to as a "data subject") that may be used or processed by us (referred to as a "data controller") in order to carry out its function as a training organisation.

There are two categories of data:

Personal Data: Personal data is data that relates to a living individual (data subject) who can be identified from the data or other information which is already in the possession of or is likely to come into the possession of the data controller. It also includes any expression of opinion about the data subject and any indications of the intentions of the data controller that can be held electronically or in a hard copy in respect of the individual.

Sensitive Personal Data: This is data that relates to a data subjects racial or ethnic origin, political opinion, religious belief or beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life, the commission or alleged commission of any offence, criminal proceedings or the sentence of any court/convictions.

Data Protection Policy

Data Protection Principles.

We will handle and protect information in line with the eight principles of the Data Protection Act as set out below:

- Personal data shall be processed fairly and lawfully
- Personal data shall only be obtained for specified and lawful purposes
- Personal data shall be adequate, relevant and not excessive
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data shall not be kept for longer than is necessary
- Personal data shall be processed in accordance with the rights of the data subject under the Act
- Personal data shall not be transferred to a country or territory outside of the Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction or, or damage to, personal data

Collecting Personal Data

Personal data that is collected by us serves the purpose of enabling us to carry out our functions as a training organisation. We may collect and process the following examples of personal information, although we may at times also need to collect other personal information that is not listed here:

- Name, job title and contact information (for example, address, telephone numbers, email)
- Age, Ethnicity, gender, nationality, disability status
- Occupation, place of work and work history
- Information about education and qualifications

We may use or process this information to:

- identify a living individual ('personal data')
- process an application for a course, qualification award or membership of ILM
- undertake administration in relation to the qualification for which the learner is registered including providing to you a certificate on successful completion of the learner's qualification or specified units of it
- inform learners of products or services offered by us
- disclose to its regulators where so required; and
- disclose to relevant industry bodies where so required by law to or account for learners where there is a requirement to do so; and contact a learner directly if there is a requirement for such bodies and the information is not readily accessible by other means
- upload achievement data on the Personal Learning Record for Qualifications that the learner has been registered in and in accordance with our agreement with the ILM.

We will not share this data with any other person or organisation

In relation to sensitive personal data, for the following purposes:

- to collect and analyse data relating to a living individual's racial or ethnic origin, political opinions, religious beliefs, mental health, sexual life, trade union membership or criminal convictions or proceedings relating to any criminal charges against such individual ('sensitive information')
- to administer requests for reasonable adjustments under the Reasonable Adjustments policy or to carry out statistical analysis (on an anonymised basis) which may be carried out by us or selected third parties;
- to monitor (on an anonymised basis) equal opportunities relating to ethnicity or disability or other such monitoring purposes.

Any organisation or third party receiving personal information that we share will be required to protect information in line with the Act.

By submitting information to us, you are giving us authorisation to process the data accordingly. If contact information is provided, you consent to receiving information relating a requested activity by email, post or telephone unless you state otherwise. We have appropriate technical and organisational measures in place to protect and ensure the safety of stored data to prevent unauthorised disclosure or use.

Data provided to us is stored on secure systems in the UK. In the event of a security breach we will implement its procedures for assessing the risk associated by the breach, notifying individuals affected by the breach and reviewing/updating security measures as mitigation.

Protection Notice - Learners

We are required to comply with the provisions of the Data Protection Act 1998 (the 'Act') in relation to how we handle any personal data which we obtain from you. Any personal information gathered will only be used in the context of your studies with us. We may also collect sensitive personal data relating to you but only with your explicit consent in advance.

We may process all the information we obtain from you to enable us to fulfil our contractual obligations to you. We may also request further information from third parties or shall disclose your details to other selected third parties, such as ILM or its regulators or industry bodies. In disclosing your personal details to us, you agree that we may process and in particular may disclose your personal data:

- as required by law to any third parties; and
- to the ILM who may use your personal data to:
 - undertake administration in relation to the qualification for which you are registered including providing you with a certificate on successful completion of your qualification or specified units of it;
 - contact you directly in relation to ILM studying membership, centre approval or qualifications and/or quality control purposes undertaken by ILM for the qualifications for which the learner is registered;
 - inform you of products or services offered by ILM;
 - disclose and publish your details in directories which may contain information about us
 - disclose to ILM's regulators where so required;
 - disclose to relevant industry bodies where so required by law;
 - carry out statistical analysis on an anonymised basis;
 - disclose your personal details to third parties for the purposes of providing prizes, remuneration and qualifications for learners;
 - administer requests for reasonable adjustments under the Access of Assessment policy;
 - carry out statistical analysis (on an anonymised basis) which may be carried out by us or selected third parties;
 - and to monitor (on an anonymised basis) equal opportunities relating to ethnicity or disability or other such monitoring purposes

You have the right to have us correct any inadequacies in the personal details we hold about you, and to object to any direct marketing we carry out using your personal details. You also have the

right to ask for a copy of the information we hold in our records, in return for a small fee of not more than £10. Please contact us if you want a copy of the personal data we hold about you.

We are required to comply with the provisions of the Data Protection Act 1998 (the Act) in relation to how we handle any personal data we obtain from you. Any personal information we gather will only be used in the context of the business we conduct with you. We may also collect Sensitive Personal Data about you, but only with your explicit consent in advance. We may process all the information we obtain from you to enable us to fulfil our contractual obligations to you and we may request further information from third parties or disclose your details to other selected third parties, such as ILM or its regulators or industry bodies. We may from time to time email or post to you [or your company] details of products or courses we believe may be of interest to you. If you no longer require such information or you have provided us with any information that you no longer wish us to use, please contact us. In disclosing your personal details to us, you agree that we may process and in particular may disclose your Personal Data:

- as required by law to any third parties
- to selected third parties who may process Personal Data on our behalf
- to third parties such as ILM who may use your personal data or sensitive personal data (as appropriate) to:
 - enable us to fulfil our contractual obligations to you – for example by providing you with an examination certificate;
 - contact you directly about events, courses, programmes, or ILM membership
 - carry out statistical analysis or pass to their regulator or industry bodies to (1) monitor equal opportunities relating to ethnicity or disability, or for other such monitoring purposes or to (2) account for learners where there is a requirement to do so, or to (3) meet their requirement to contact you directly and the information is not readily accessible from any other source
 - disclose and publish your details in directories which may contain information about us and provide or arrange prizes, remuneration and awards
 - contact you about your ILM studying membership
 - We undertake that it and its staff will take every reasonable step possible to protect the confidentiality and security of all material it receives, to carry out its various responsibilities

You have the right to have us correct any inadequacies in the personal details we hold about you, and to object to any direct marketing we carry out using your personal details. You also have the right to ask for a copy of the information we hold in our records, in return for a small fee of not more than £10. Please contact us if you want a copy of the personal data we hold about you.