
Policies and Procedures

GDPR Privacy Notice

Introduction

This document comprises a Privacy Notice which complies with UK General Data Protection Regulations and applies to our website and sub-websites and our associated platforms owned or operated by Wise Origin (WO). This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. By using the website(s) or any of our services, you consent to the data practices described in this privacy policy. If you do not agree with the data practices described in this Privacy Policy, you should not use the websites or our services.

Purpose

This website is operated by Leaning for Futures LTD T/A Wise Origin. Unless stated otherwise, Wise Origin is the data controller in respect of all personal data collected on our website(s) which means that we are responsible for how we hold and use personal information about you and ensuring that we do so in full compliance with data protection and all related privacy laws. This Privacy Policy explains what information is collected about you, how we use it and the steps taken to keep it secure.

Please note, our website may contain links to other websites which are provided for your convenience. We are responsible for our own security of the website and practices. For other websites, please refer to their own Privacy Policies.

It is important that you read and retain this notice, together with any other Privacy Notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

We need to collect your personal information before we enroll you onto a programme with us. Such information is required by funding bodies, qualification awarding bodies and to enable us to verify your entitlement to start the training.

Data Protection Principles

Data protection law says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.

2. Collected only for valid purposes
3. Minimum amount of relevant information is collected and processed.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely ensuring appropriate security measures in place.
7. Accountability to follow data protection principles.

We will comply with our obligations listed above.

The kind of information we hold about you

Personal data, or personal information, 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).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

We will collect, store, and use the following categories of personal information about you in order to provide our services;

- Contact details of those we deliver apprenticeship or commercial training to and those who work within an organisation as a point of contact for billing, contracts and decision making.
- Residential status for example where the apprenticeship programme is funded by the government and required applicants to have a right to work in the UK.
- Current study status for example where the apprenticeship programme is funded by the government and needs to be verified for eligibility.
- National insurance number, date of birth, gender, disability, ethnicity information, special educational needs.
- Feedback we receive and your interest in Wise Origin and its services.
- Employment details which is used to contact the employer of a learner and for tutor visits as well as employer logins to the e-portfolio systems.
- Emergency contact details of your next of kin or trusted contact in case of an emergency.

The information will be obtained from our websites, telephone conversations, emails, written and verbal communications and from records of training sessions or meetings.

We may add information you supply with other information that we obtain from our dealings with you (such as where we have worked with you in the past or you have received training with us in the past).

How will we use information about you

All personal information we collect about you or other individuals will be used and protected by us in accordance with current data protection legislation and this Privacy Policy.

We will mainly use your personal information:

- for processing, vetting and screening applications for apprenticeship roles

- to provide services you request from us
- to track and analyse activity on our website(s)
- to create a contact profile for you so we can provide an enhanced user experience, respect your preferences and subscription requests
- to maintain suppression and opt-in lists for newsletters, offers and other marketing emails
- for dealing with enquiries
- to carry out market research in order to improve our services and offer
- for use in statistics reports, such as succession rates
- for adequate and non-excessive processing
- for processing for a limited purpose
- for access to our e-portfolio systems and storage on our management information systems.
- to contact you in order to reengage and ensure our services are delivered successfully
- to share with emergency services, safeguarding officers or related agencies with your permission to ensure learner welfare and wellbeing is maintained.
- If you are under 18 and your safety or welfare is at risk, then we have a duty of care to pass on confidential information to external agencies.

Your personal information may be used by the Department for Education (DFE) to exercise its functions and to meet its statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009 and to create and maintain a unique learner number (ULN) and a personal learning record (PLR). Your information will be securely destroyed after it is no longer required for these purposes.

We would like to contact you and/or any person whose information you provide to us with invitations to enjoy other products and services we provide (where you have agreed). This may include newsletters to inform you and/or them about offers and opportunities that are available and about a range of other initiatives in a number of ways, including by text message or by email.

You and any other person you provide information for can change your/their mind about whether you wish to receive details of our offers and opportunities at any time. You may change your preferences using our contact details.

Consent and lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- for administration: which is necessary to fulfil service requests
- where consent is provided or processing may be necessary, to comply with legal obligations
- where explicit consent has been provided for processing sensitive data
- legally required by the Education and Skills Funding Agency (ESFA)

Data security

We take the security of personal information seriously. We use several layers of security technology such as firewalls and security certificates to safeguard your and other's information. We also have procedures in place to ensure our computer systems, databases, servers and paper stores are protected against unauthorised disclosure, use, loss and damage and your personal data will not be accessed by anyone other than those members of the business involved and third party providers with whom permission has been granted.

Third Party Processors

We only use third party service providers where we are satisfied that they provide their own adequate security of your personal data.

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.

Monitoring

We may monitor or record telephone calls for training and quality purposes.

Updating and correcting information

You may update or correct personal information online using relevant membership areas or by contacting us at contact@wiseorigin.co.uk. Please include your name and email address when contacting us so we can correctly identify you on our systems and ensure we amend the information for the correct person.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

Your rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

You have a number of legal rights in respect of your personal data. These include:

- **the right of access** – Upon your request, we can provide the data we have collected of you. We normally expect to respond to requests within 28 days of receiving them, you can fill in the form here to make a request or by emailing hr@wiseorigin.co.uk.

- **the right to rectification** – You have the right to have inaccurate personal data rectified that we have collected. You may also be able to have incomplete personal data completed.
- **the right to erasure** – Also known as the 'right to be forgotten', you have the right to have your personal data erased if:
 1. the personal data is no longer for the purpose which we originally collected or processed it for;
 2. if we are relying on consent for processing and you withdraw your consent;
 3. you object to the processing of your data, and there is no overriding legitimate interest to continue this processing. You also have the right to object where we are processing your personal information for direct marketing purposes.
 4. we have processed the personal data unlawfully;
 5. we must do it in order to comply with a legal obligation; or
 6. we have processed the personal data to offer information society services to a child.
- **the right to data portability** – You have the right to receive personal data you have provided to us in a structured, commonly used and machine readable format. You also have the right to request that we transmit this data directly to another data controller.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Human Resources via email at hr@wiseorigin.co.uk or by post to Wise Origin, 22 St Georges Way, Leicester, LE1 1SH.

Apprenticeship candidates

WO will collect the information as outlined in this policy in a variety of ways. For example, data might be contained in application forms, CVs, your passport or other identity documents, or collected through interviews or other forms of assessment such as online tests or assessment days.

Data will be stored in a range of different places, including on your application record, in a password protected CRM system and on other IT systems (including email).

WO needs to process personal data to take steps at your request prior to entering into a contract with you. It also needs to process your personal data on behalf of employers it is recruiting for, in order for them to make recruitment decisions and potentially enter into a contract of employment with you. In some cases, WO needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

WO has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows WO to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a position on behalf of an employer. WO may also need to process data from applicants to respond to and defend against legal claims.

WO may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. WO processes such information to carry out its obligations and exercise specific rights in relation to employment, on behalf of employers that we are recruiting for.

If your application is unsuccessful, WO may initially keep your personal data on file for up to 12 months in case there are future employment opportunities for which you may be suited. You are free to withdraw your consent at any time.

Personal data gathered during the recruitment process may be shared internally amongst our Sales and Recruitment team for the purposes of a recruitment exercise. If you are successful in your application, WO will then share your personal data with the prospective employer to obtain pre-employment checks. After successful recruitment, your personal data will be shared internally with the compliance team and relevant information will be transferred over to the relevant employer we are recruiting on behalf of. WO will continue to retain your personal data on file for the duration of the apprenticeship.

WO will also have a duty to share any data relating to your apprenticeship with the Education Skills Funding Agency (ESFA) and the relevant awarding body as part of government regulations. When information is shared, it is done so securely and with appropriate security safeguards in place to protect your data in compliance with the GDPR and DPA 2018.

WO will not transfer your data outside the European Economic Area.

You are under no statutory or contractual obligation to provide data to WO during the recruitment process. However, if you do not provide the information, Hawk Training may not be able to process your application properly or at all.

All applications to Hawk Training are reviewed with meaningful human intervention and recruitment processes and decisions are not based solely on automated processing or profiling.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. We have several set durations for the retention of personal information depending on the information used. We regularly review the personal data we hold and will delete anything we no longer need.

For information stored for the purpose of training and education, we follow the Education and Skills Funding Agency retention policy, personal data will only be retained if a business need exists. We will also not keep your personal data longer than required.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. Please ask a senior manager or a director for the contact details of the ICO.

Changes to the privacy notice

We may update this Privacy Policy from time to time. You should check the website occasionally to review any changes. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of the website(s), our services, and/or continued provision of Personal Information to us will be subject to the terms of the then-current Privacy Policy.

Review of the Policy

The GDPR Privacy Notice Policy will be revised annually by the Senior Management Team and Director.

Policy Review	Review Date	Next Review Date	Approved by
Annually	1 st October 2024	25th July 2025	Umair Khan