

Ginger Nut Training – Privacy Notice

Document Title	Ginger Nut Training – Privacy Notice
Originator	Directors
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Responsible Person	Dan Williams
Policy Due for Renewal	April 2025
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This Privacy Notice describes how Ginger Nut Media t/a Ginger Nut Training protects and makes use of the information you provide us with.

About this document

This privacy notice explains how Ginger Nut Training (“we”, “our”, “us”) collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of Ginger Nut Training (“you”, “your”)

Ginger Nut Training is the data controller of your personal data and is subject to Data Protection Law. This includes the Data Protection Act 2018 (“DPA”) and any successor Data Protection Legislation under which the General Data Protection Regulation (“GDPR”) has been incorporated.

Who does this apply to?

People who use or may use our services. This includes for example:

- individuals who study a course with us
- employers who employ an Apprentice
- individuals who request information from us.

If you are asked to provide information to us, it will only be used in the ways described in this Privacy Notice. This Privacy Notice is updated from time-to-time.

The latest version is published on our website.

If you have any questions about this policy, please e-mail delivery@gingernuttraining.co.uk or write to us at

Privacy Team, Ginger Nut Media Ltd, Box 162, 9 St Johns Street, Communications House, Colchester, CO2 7NN

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at Ginger Nut Media;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or apply for an apprenticeship;
- in various other ways as you interact with us during your time as an apprentice with Ginger Nut Media, for the various purposes set out below;

The types of information we collect

We may collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number;
- company information e.g. financial, staff, training needs analysis
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of work submitted and other information in your student record;
- information about your family or personal circumstances, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care;
- information about your sex, disability, racial and ethnic origin.

How we use that information

Collecting this data helps us provide you with a service which meets your needs.

Specifically, we may use data:

- to meet our legal and statutory duties and responsibilities
- to process applications, enrolments and workforce development programmes and contracts
- for our own internal records so that we can provide you with a high quality service
- to contact you via e-mail telephone or mail for research purposes
- to be shared with other organisations for education, training, employment and well-being related purposes, including for research
- to register your learning with an End Point Assessment Organisation for the purposes of learning, assessment and certification

At no time will we assume your permission to use information that you provide for anything other than the reasons stated here.

How we use information about our students

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

- recruitment and admissions;
- academic matters, including:
 - the provision of our core teaching and learning services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification);
 - maintaining student records;
 - assessing your eligibility for additional funding.
 - providing IT and information services;
- monitoring equal opportunities;
- safeguarding and promoting the welfare of students;
- administering finance (e.g. funding returns);
- other administrative purposes, including: carrying out research and statistical analysis;
- carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
- dealing with grievances and disciplinary actions;
- dealing with complaints and enquiries.

Security

We will hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong organisational and technical security safeguards.

If information is shared with another organisation (reasons for this are given in the section below) we will ensure an Information Sharing Agreement is in place.

We also follow stringent procedures to ensure we work with all personal data in line with the Data Protection Law. For more information on this please see our Data Protection Policy

Storage

Information we collect may be transferred and stored outside of the EEA for the purpose of supplying our goods or services to you. By submitting your personal data, you agree to this transfer, storing or processing.

Data will only be transferred to countries deemed adequate by the commission or under the Privacy Shield Framework. We will always take all reasonable precautions to make sure that your data remains secure and is handled in accordance with this Privacy Policy.

The lawful basis for processing your information and how we use it

We may process your personal data because it is necessary for the legitimate performance of a contract with you (or a third party) or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as part of the admissions process (e.g. to confirm eligibility for the course);
- once you have enrolled, to provide you with the services as set out in our learning agreement;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interest. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Commitment Statement but which are nevertheless a part of our academic and educational mission;
- to monitor and evaluate the performance and effectiveness of the organisation, including by training our staff or monitoring their performance;
- to promote equality and diversity;
- to seek advice on our rights and obligations, such as where we require our own legal advice;

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

Sharing information with others

We do not sell or rent your personal information.

Your information may by necessity be disclosed to appropriate staff members of Ginger Nut Training and to government bodies to fulfil our statutory responsibilities such as the Education and Skills Funding Agency, Ofsted or the Learning Records Service.

We may need to share your information with other organisations, and we will take steps to ensure that these organisations operate within the requirements of Data Protection Law. This includes the following organisations who in some circumstances may act as data processor on our behalf:

- Internal and external quality assessors and auditors.
- IT service providers
- Any person providing the Training Services on behalf of the Training Provider;
- IT service providers (for the purpose of hosting, supporting or maintaining the Training Provider's IT systems, including any back-up and disaster recovery systems)
- End Point Assessment Organisations

Information may be shared with third parties if it is in connection with the service we are providing to you, for example we might share information with market research companies contracted to undertake work on our behalf to assess your satisfaction with our service. When we do this will ensure there is an Information Sharing Agreement in place.

Any personal information we hold about you is processed in accordance with the Data Protection Act 2018.

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity not to opt in to some of these data sharing arrangements, but you should carefully consider the possible impact of doing this.

How long your information is kept

Data will be retained under an Information Asset Register schedule of approved retention periods. Subject to any other notices that we may provide to you, we may retain your personal data for a period of ten years after your association with us has come to an end. This may be longer in the case of European Social Fund programmes and in some cases, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes (or by the Marketing team for the purposes of supporting your lifelong relationship with Ginger Nut Training t/a Ginger Nut Training).

For full detail on Government Data retention guidance please see <https://www.gov.uk/government/publications/record-keeping-and-retention-guidance-for-fe-training-providers/record-keeping-and-retention-information-for-training-providers>

Main record types for retention are:

- Learner records – retained for 6 years beyond end of the last financial year in which the learner was funded
- Portfolios – retained for 2 years from end of course
- European Social Fund – where applicable, records will be retained until at least 31st December 2030

Data Destruction

Where paper copies of records are held these will be shredded using a cross cutting shredder.

Digital Copies will be securely deleted from the systems where they are held.

Your Rights

Under Data Protection Law you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications.
- to require us to correct the personal data we hold about you if it is;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Accessing Your Own Personal Information

You have the right to ask for a copy of any of your personal information held by Ginger Nut Media. You can make a 'subject access request' under the Data Protection Act 2018.

To make a request contact our administration team:

Mr Jim Thomas, MIS Lead

Email: delivery@gingernuttraining.co.uk

Post: Ginger Nut Media Ltd, Box 162, 9 St Johns Street, Communications House, Colchester, CO2 7NN

Updating Your Own Personal Information

You have the right to ask us to update any information held by Ginger Nut Media.

To make a request contact our administration team:

Mr Jim Thomas, MIS Lead

Email: delivery@gingernuttraining.co.uk

Post: Post: Ginger Nut Media Ltd, Box 162, 9 St Johns Street, Communications House, Colchester, CO2 7NN

Complaints or Queries

If you have any questions about our collection and use of personal data please contact us. We are happy to provide additional information if it is required.

Changes to This Privacy Notice

Ginger Nut Training will take appropriate measures to monitor new regulations and update our Privacy Policy and procedures accordingly.

At minimum, this policy and related procedures will be reviewed annually by Ginger Nut Trainings Directorship.

A Data Processing Impact Assessment will be performed by the responsible Director before any changes to procedures are implemented whereby a type of processing is likely to result in a high risk to the rights and freedoms of individuals.

Should any significant changes be required by law, we will seek external specialist advice.

Any changes made will be communicated to all employees via BreatheHR and immediately posted on the website. Should training be required, responsibility will sit with Line Managers and must take place within 14 days of amendments to the policy.

Failure to adhere to the Privacy Policy may be considered gross misconduct.

Responsible Director

Mr Dan Williams, Director

Email: dan.williams@gingernutmedia.com

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