

Ginger Nut Training.



Document Title

Ginger Nut Training – Privacy Notice

Originator

Directors

Responsible Person

Dan Williams

Date of Approval

14 August 2026

Policy Due for Renewal

31 August 2027

Version

10.2

This Privacy Notice describes how Ginger Nut Media t/a Ginger Nut Training protects and makes use of the information you provide us with.

For more detailed information on our data protection practices, including our procedures for handling data breaches, conducting Data Protection Impact Assessments (DPIAs), and ensuring regular training and awareness for our staff, please refer to our Data Protection Policy. This policy also outlines our commitment to monitoring and updating our data protection processes in response to changes in privacy laws and regulations. The Data Protection Policy is available on our website.

About this document

This privacy notice explains how Ginger Nut Media Limited T/A 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 several 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.

Information We Receive from Employers, Awarding Bodies and Government Agencies

As an apprenticeship training provider, we may receive personal information about learners from employers, government agencies, awarding organisations, end-point assessment organisations and other educational providers.

This information *may* include:

- employment details and job role information;
- working hours and employment status;
- apprenticeship eligibility information;
- prior qualifications and achievement records;
- Unique Learner Number (ULN);
- attendance, progress and achievement information;

- safeguarding, wellbeing or support requirements where appropriate;
- information required to deliver apprenticeship training and claim public funding.

We only collect and process information that is necessary for legitimate educational, contractual, safeguarding or legal purposes.

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 learners

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.

Use of AI Tools with Personal Data

Ginger Nut Training uses approved artificial intelligence (AI) tools in a limited and controlled manner to support administrative activities and improve service efficiency.

Where Microsoft Teams transcription, meeting notes or similar AI-assisted features are used, these may process audio, video and spoken content shared during meetings. AI-generated meeting notes and transcriptions are reviewed by a member of staff before being relied upon, stored or shared.

Ginger Nut Training does not use AI systems to make automated decisions about learners, apprentices, employers or staff that produce legal or similarly significant effects. All decisions affecting learners remain subject to meaningful human review and oversight.

Where AI-assisted meeting tools are used during reviews, support meetings, progress reviews or learning sessions, learners will be informed in advance and may request reasonable alternative arrangements where practicable.

Any AI tools used by Ginger Nut Training must be approved through the organisation's AI governance procedures and must comply with our Data Protection Policy, Acceptable Use Policy and Information Security arrangements.

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 handle all personal data in accordance with the Data Protection Law. For more information on this, please see our Data Protection Policy

International Transfers and Storage

Personal information may be stored or processed using systems hosted within the United Kingdom or overseas.

Where personal data is transferred outside the United Kingdom, Ginger Nut Training will ensure appropriate safeguards are in place. These may include:

- Countries recognised by the UK Government as providing an adequate level of data protection;
- The UK International Data Transfer Agreement (IDTA);
- International transfer clauses approved for use under UK GDPR;
- Other lawful safeguards permitted by UK data protection legislation.

We will take all reasonable steps to ensure your personal information remains protected and processed in accordance with UK data protection laws.

Special Category and Criminal Offence Data

Some information we process may be classified as special category personal data under UK GDPR, including information relating to:

- health and disability;
- ethnicity;
- sex;
- safeguarding and welfare concerns.

We may process this information where necessary to meet our legal obligations, protect individuals, deliver educational services, support equality of opportunity, provide additional learning support, safeguard learners, or fulfil obligations under education and skills funding arrangements. Where required, information relating to criminal offences, allegations or safeguarding investigations may also be processed in accordance with the Data Protection Act 2018 and other applicable legislation.

The Lawful Basis for Processing Your Information

Ginger Nut Training processes personal information under one or more lawful bases permitted by UK GDPR.

Activity	Lawful Basis
Apprenticeship delivery and learner support	Public Task / Contract
Enrolment and admissions	Contract
Funding claims and regulatory reporting	Legal Obligation
Safeguarding and Prevent responsibilities	Legal Obligation / Vital Interests
Equality monitoring	Substantial Public Interest
Learner progress monitoring	Public Task
Complaints and investigations	Legitimate Interests
Quality assurance and audit activity	Legal Obligation / Legitimate Interests
Marketing communications	Consent or Legitimate Interests

Where we rely on consent, individuals may withdraw consent at any time.

Sharing information with others

We do not sell or rent personal information.

We may share personal information where necessary with:

- Department for Education (DfE);
- Education and Skills Funding Agency (ESFA);
- Department for Work and Pensions (DWP)
- Ofsted;
- Learning Records Service (LRS);
- Awarding Organisations;
- End-Point Assessment Organisations;
- Internal and external auditors;
- External quality assurance organisations;
- Approved subcontractors or delivery partners (where applicable);
- IT service providers and software suppliers;
- Professional advisers, insurers and legal representatives;
- Law enforcement and regulatory agencies where required by law.

As part of apprenticeship delivery, we are required to collect and share learner information with government departments and funding bodies for funding, monitoring, auditing, inspection, research and statistical purposes.

Information may also be shared where necessary to:

- protect an individual's vital interests;
- safeguard children, young people and vulnerable adults;
- comply with the Prevent Duty;
- comply with legal or regulatory obligations;
- investigate fraud or criminal activity.

Where third parties process information on our behalf, appropriate contractual safeguards and data processing agreements will be in place.

How long your information is kept

Data will be retained under an Information Asset Register schedule of approved retention periods.

Personal information will be retained in accordance with our Information Asset Register and Data Retention Schedule. Retention periods are determined by funding, legal, contractual, safeguarding and operational requirements. Where records are no longer required, they will be securely destroyed.

This may be longer for European Social Fund programmes, and in some cases, we may retain certain information indefinitely to maintain your academic record for archiving purposes (or by the Marketing team to support 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 UK data protection legislation, you have the right to:

- be informed about how your information is used;
- access the personal information we hold about you;
- request correction of inaccurate information;
- request erasure of personal information in certain circumstances;
- request restriction of processing in certain circumstances;
- object to processing in certain circumstances;
- receive a copy of information in a portable format where applicable;
- withdraw consent where processing is based upon consent;
- object to direct marketing communications;
- request a review of any automated decision-making where applicable.
- These rights are not absolute and may be limited where exemptions apply under UK data protection legislation.

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, Finance and Fraud Prevention 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 team:

Mr Jim Thomas, Finance and Fraud Prevention 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.

Complaints About Data Protection

If you have concerns about how Ginger Nut Training handles your personal information, please contact us first so that we can investigate and attempt to resolve the matter.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

Telephone: 0303 123 1113

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 Training's Directors

A Data Processing Impact Assessment will be performed by the responsible Director before any changes to procedures are implemented that involve processing likely to pose a high risk to individuals' rights and freedoms.

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

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

Dan Williams

[Dan Williams \(Aug 14, 2026 10:08:43 GMT+1\)](#)

Harry Simpson

[Harry Simpson \(Aug 25, 2026 12:52:21 GMT+1\)](#)

Ginger Nut Training_Privacy Notice_14082026

Final Audit Report

2026-08-25

Created:	2026-08-14
By:	Ginger Nut Training (delivery@gingernuttraining.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAAqwVQ8q7iec4y4Z400afOJAbqL5pqrwwK

"Ginger Nut Training_Privacy Notice_14082026" History

-  Document created by Ginger Nut Training (delivery@gingernuttraining.co.uk)
2026-08-14 - 9:04:36 AM GMT
-  Document emailed to dan.williams@gingernut.co.uk for signature
2026-08-14 - 9:04:41 AM GMT
-  Document emailed to harry.simpson@gingernut.co.uk for signature
2026-08-14 - 9:04:41 AM GMT
-  Email viewed by dan.williams@gingernut.co.uk
2026-08-14 - 9:08:21 AM GMT
-  Signer dan.williams@gingernut.co.uk entered name at signing as Dan Williams
2026-08-14 - 9:08:41 AM GMT
-  Document e-signed by Dan Williams (dan.williams@gingernut.co.uk)
Signature Date: 2026-08-14 - 9:08:43 AM GMT - Time Source: server - Signature Appearance Selected: TYPE
-  Email viewed by harry.simpson@gingernut.co.uk
2026-08-25 - 11:40:47 AM GMT
-  Signer harry.simpson@gingernut.co.uk entered name at signing as Harry Simpson
2026-08-25 - 11:52:19 AM GMT
-  Document e-signed by Harry Simpson (harry.simpson@gingernut.co.uk)
Signature Date: 2026-08-25 - 11:52:21 AM GMT - Time Source: server - Signature Appearance Selected: TYPE
-  Agreement completed.
2026-08-25 - 11:52:21 AM GMT