



# Privacy Policy

## Commitment

ALS Training Ltd takes the privacy of our Learners, employers and stakeholders very seriously and is committed to protecting the personal information that they share with us through our business activities.

## Purpose

This Privacy Policy sets out the basis on how any personal data we collect from you, or that you provide to us, will be processed or controlled by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## Scope

This policy applies across the Cardiff and Vale College Group (including ACT and ALS) where ever we collect personal data (including via digital platforms and the company's websites) so please read it carefully.

## Responsibilities

The Audit and Guidance Manager will be responsible for ensuring that the policy is reviewed at least annually and in line with changes in legislation. The Directors will be responsible for ensuring that the Senior Management Team and Board are briefed on the policy and its content. Department Managers will be responsible for ensuring that all staff under their direct control are adhering to the policy.

## Communication and Storage

The policy will be communicated and available via the company's website, OneFile, SharePoint and Iris HR Portal.

## Document / Policy Change Request

Changes to the policy will be made by the Audit and Guidance Manager with requests to be made via email to [matthew.jones@alstraining.org.uk](mailto:matthew.jones@alstraining.org.uk)

Our Privacy Policy explains what information we collect, why we collect it and how we use this information. In addition to this the policy will explain the steps we take to secure your information.

This policy also explains your rights in respect of your personal data.

## Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on the company's website. Please check frequently to see any updates or changes to our Privacy Policy.



## How to contact us about your personal data or this Privacy Policy

If you have any questions about your personal data or about this policy or to exercise all relevant rights or complaints please in the first instance contact our company's Data Protection Officer. Use the contact information provided below;

Data Controller  
ALS Training Ltd  
Ocean Park House  
East Tyndall Street  
Cardiff  
CF24 5ET  
02922 677020  
[info@alstraining.org.uk](mailto:info@alstraining.org.uk)

## How we use the data we collect from you

We collect information from you to enable us to provide our services to you as an employer, learner or stakeholder of the company. We process the personal data that you provide us in order to deliver the funded learning programme or the qualification that you are about to enrol on. All personal information you provide us with will be recorded, used and protected by us in line with the General Data Protection Regulations and the Data Protection Act 2018. Taking part in a funded training programme is dependent on you providing personal data.

Where applicable, the data you provide us with will be used by the Welsh Government (data controller for Welsh based funded learners) to carry out its public duty to administer and monitor the use of its funds. For English based learners most of the information is passed to Government agencies (including but not limited to the Education Skills Funding Agency to meet funding arrangements. Where necessary it is also shared with the Department for Education (DFE).

We may also use the personal data you provide us in the following ways;

- To administer and provide services you request or have expressed an interest in
- To process applications
- For internal record keeping and progress against the services we provide
- We will share this information with, where applicable, Welsh Government and other public bodies to carry out funding, planning, monitoring and inspection of learning and to produce statistical publications
- We will share this information with awarding organisations in order to administer the delivery of learning programmes
- To support your learning, communicate with you about the services you request or express an interest in
- To personalise/tailor any communications that we may send you
- To monitor and report on your progress
- To assess and report on the quality of our services
- To provide appropriate pastoral care and safeguarding
- To comply with the law and any legal obligations that we may be subject to



Welsh Government will also use your information in the following ways;

- By selected third parties, including social research organisations, to carry out research, analysis or equal opportunities monitoring relating to education and training
- By the Welsh Government and third parties acting on its behalf to assist in linking your records to other data sources for the purpose of statistical research
- The Welsh Government may share your date of birth, name, address and postcode with electoral registration officers taking part in data matching pilot schemes to improve the accuracy of electoral registers
- Your contact details may be passed on to contractors acting on behalf of the Welsh Government (including the Wales European Funding Office) to undertake interviews or surveys of current and former learners as part of formal evaluations of Welsh Government funded programmes. Contractors will contact a sample of individuals
- You may be contacted and asked to take part in an evaluation of your personal experience of a learning activity

If you are contacted, the purpose of the interview or survey will be explained to you and you will be given the option to say yes or no to taking part. Contractors for Welsh Government will use your details only for the purpose of carrying out the evaluation or survey and in accordance with the Data Protection Act.

ALS Training Ltd uses your name, email address and phone number to maintain contact and arrange appointments with you throughout your qualification or Apprenticeship as required by Funding bodies and Awarding Organisations. We will use these details to provide you with your online eportfolio account, on for example OneFile, as part of your qualification or Apprenticeship programme.

We may also share your information for legal reasons if we believe in good faith that access, use, preservation or disclosure of the information is necessary to;

- Meet requests from Government bodies, law enforcement agencies in relation to any investigation to aide with the detection, prevention of any unlawful activity
- Detect or prevent fraud, security or technical issues
- Assist other third parties in legal proceedings

The lawful basis for us processing your data under the General Data Protection Regulations falls under the following;

- Processing is necessary in the public interests
- Processing is necessary for the performance of a contract

In providing you with our services we may collect and store any personal information that you provide to us. We will keep a record of the following information in relation to your personal data;

- Your Name
- Address
- Date of Birth
- Email Address
- Telephone/mobile number
- Payment details (where applicable)
- Disability, additional learning needs or health requirements (these are optional and you have the choice to provide/not provide this information)
- IP address
- MAC address
- Date and time stamp



## Suppliers

When we interact with suppliers we will collect personal identifiable information such as;

- Employee name
- Telephone number
- Work email address

We collect this information in order to be able to contact you about the goods or services that you supply us with, to allow us to place additional orders with you and pay for goods and services that you supply to us. This data will be held for 6 years from the point of the goods or services that you supply.

## Employers

To support the delivery of qualifications or Apprenticeships within an employer organisation we will collect the following information in order to allow us to communicate effectively during the learning programme, report on learner progress and provide you with an account on the OneFile eportfolio system;

- Employee name
- Work email address
- Work telephone/mobile number
- Workplace address

## Retention of Data

We retain your personal data for as long as necessary to provide you with our services and for the fulfilment of our contractual, legal or regulatory requirement. Further information on retention periods can be found in our Privacy Notice.

### [ALS Privacy Notice](#)

## Cookies

As with many other websites we utilise standard technology cookies on our website. A cookie is a small file which asks permission to be placed on your computer. These files help us analyse web traffic on each visit to our site. These cookies help us analyse data about our website and improve website in order to ensure that we continue to meet the needs of our customers. We only use this information for statistical purposes and then the data is removed from the system.

You can choose to accept or decline these cookies through your web browser settings. If you prefer you can decline cookies, however, this may affect your use of the website.



## **The Safety of your Personal information**

We take the safety of your information extremely seriously and work hard to ensure that it is protected from unauthorised access. We have appropriate firewalls and encryption in place on the databases holding your personal data and this information is only accessed in line with the company's access control policy.

In addition to this we have physical access controls in place within our building and access to your data is only given to those employees that need access to carry out their job role. Employees may be disciplined or their contract terminated if they fail to comply with these obligations.

We will not sell, distribute or lease your personal data with any third parties unless we have your explicit permission or we are required by law to do so.

## **Legal Basis for Processing**

We will only use the personal information you provided us where the law permits. Generally we will process your personal data in the following ways;

- In the performance of a contract we enter into with you
- Where necessary in compliance with a legal obligation that we are subject to
- In line with public interests
- For legitimate business interests

## **Your Rights and your Personal Data**

- The right to request a copy of the personal data which we hold about you
- The right to request that we correct any personal data if it is found to be incorrect
- The right to request your data is erased (in certain circumstances)
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing the data
- The right to request that we provide you with your personal data and where possible, transmit the data directly to another data controller
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing
- The right to object to the processing of personal data, where applicable i.e. where processing is based on legitimate interests, or the performance of a task in the public interest/exercise of official authority, direct marketing and processing for the purposes of scientific/historical research and statistics
- Lodge a complaint with the Information Commissioner's Office (ICO) who is the independent regulator for data protection

You may request details of the personal data which we hold about you under the General Data Protection Regulations and Data Protection Act 2018. If you believe that any of the information we are holding on you is incorrect or incomplete, please write or email us as soon as possible using the contact details listed in the how to contact us section of this policy.