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# Privacy Notice

## General Data Protection Regulation (GDPR)

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This Privacy Notice has been written to inform participants of Inspire 2 Independence Ltd about what we do with your personal information.

### Changes to this Privacy Notice

Inspire 2 Independence Ltd may amend this Privacy Notice from time to time. If we make any substantial changes in the way we use your personal information we will make that information available by amending this notice.

### Who are we?

Inspire 2 Independence Ltd, for the purposes of the Data Protection Act 1998 and as defined by Article 4 (7) of GDPR, are registered as a 'data controller' for personal data processed by Inspire 2 Independence Ltd and other third parties contracted to process data for Inspire 2 Independence Ltd. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

Inspire 2 Independence Ltd Data Protection registration can be viewed on the [Information Commissioner's website](#).

Inspire 2 Independence Ltd has appointed a Data Protection Officer (DPO). The role of the DPO is to ensure that the organisation is compliant with GDPR and to oversee data protection procedures. The DPOs contact details are:

Data Protection Officer  
Inspire 2 Independence Ltd  
Independence House  
Millfield Lane  
York  
YO26 6PH  
[gdpr@enteri2i.com](mailto:gdpr@enteri2i.com)

### Why do we process information?

Inspire 2 Independence Ltd process personal information to enable us to provide education and training to our customers and clients; to promote our services, to maintain our own accounts and records and to support and manage our employees.

### What information do we collect?

Inspire 2 Independent Ltd generally collects data on behalf of a funding authority in order to meet our contractual obligations. The categories of information that we collect, hold and share include the following:

- personal information e.g. name, DOB, address and safeguarding information
- family members
- business activities of the person whose personal information we are processing
- lifestyle and social circumstances
- financial details
- training details e.g. attendance, attainment, behavioral information,
- education and employment details
- goods and services

We may also process sensitive classes of information including:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs
- trade union membership

We process personal information about:

- customers
- clients
- students
- trainers
- employees
- suppliers
- professional advisers and consultants
- complainants, enquirers

Inspire 2 Independence Ltd does not knowingly solicit personal information from children under the age of 13 or send them requests for personal information.

Much of the information we process will be obtained directly from you. We will also process information received from:

- Department for Education (DfE)
- Department of Work and Pensions (DWP)
- Education and Skills Funding Agency (ESFA)
- Local Education Authority
- Prime Contractors

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. When we do process this additional information we will ensure that we ask for your consent to process this.

The information is collected and processed in accordance with Article 6(e) and Article 9(2)(g) of GDPR as part of the official authority vested in us as Data Controller and for reasons of substantial public interest.

### Sharing data

Where Inspire 2 Independence Ltd shares data with a third party who undertakes work for Inspire 2 Independence Ltd, Inspire 2 Independence requires that the sharing is undertaken under contract and is subject to a data sharing agreement, specifying the secure management of the data.

Data might also be shared with other bodies, for the purposes of those organisations fulfilling their own statutory purposes. Such sharing is undertaken using a standard data sharing agreement for specified legitimate and restricted purposes.

In the event that a Further Education college or other training provider is unable to continue the delivery of training funded by Inspire 2 Independence Ltd (for example, where a training provider is a limited company that is dissolved, Inspire 2 Independence Ltd will endeavour to make arrangements for secure transfer of information, including the personal data, from the former training provider to another training provider to support continued learning.

Where necessary or required we may also share information with:

- business associates and other professional advisers
- educators and examining bodies
- current, past or prospective employers
- family, associates and representatives of the person whose personal data we are processing
- employment and recruitment agencies
- financial organisations
- credit reference agencies
- debt collection and tracing agencies
- suppliers and service providers;
- persons making an enquiry or complaint
- other companies in the same group
- central government

We will not share any information about you outside the organisation without your consent unless we have a lawful basis for doing so.

### Security

The security of the Inspire 2 Independence Ltd's systems which process and store data are regularly reviewed in accordance with legislative and funding requirements, and assessments and checks promoted by the Information Commissioner's Office. Data is securely deleted when it is no longer required for the purposes collected.

### **How long do we keep your personal data for?**

Inspire 2 Independence Ltd will keep your data in line with our Document Retention Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

### **What rights do you have over your data?**

Under GDPR you have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the organisation has handled your personal data. You can do so by going to the ICO's website: <https://ico.org.uk/for-the-public/raising-concerns/>

**Annex 1a: ESFA Learner Data**

The data is primarily used by ESFA to perform its statutory functions on behalf of the Secretary of State as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and for the exercise of functions of the Crown, a Minister of the Crown or that government department.

Information provided by learners may be shared with other organisations for purposes of administration, the provision of career and other guidance and statistical and research purposes, relating to education, training, employment and well-being. Other organisations include the Department for Works and Pensions, Local and Combined Authorities in England, the Greater London Authority, the Higher Education Statistics Agency, the Higher Education Funding Council for England, educational institutions and organisations performing research and statistical work on behalf of the Department for Education, or partners of those organisations.

The learner data processed by the delivery organisation on behalf of the ESFA is known as the Individualised Learner Record (ILR). The specification and standards for the ILR are published for each academic year (1 August – 31 July) by the ESFA.

Learner data is also collected and supplied to the Learning Records Service, a part of the ESFA. This personal data is used by the ESFA to issue learners with a Unique Learner Number (ULN), and to create and maintain the Personal Learning Record. Information held in the Personal Learning Record is shared with third parties such as providers of learning.

Further details of how this personal data is processed for these purposes are published for the Learning Records Service.

**Annex 1b: Apprenticeships**

As part of this service, individuals can apply for and be kept informed of apprenticeship opportunities. Personal data is processed to match registered candidate requirements to vacancies for apprenticeships, including for those employers or providers offering a guaranteed interview scheme. Inspire 2 Independence Ltd may act on behalf of employers to sift and shortlist candidates for interview that meet the criteria set by the employer. This service also enables Inspire 2 Independence Ltd, the ESFA and organisations funded to deliver the National Careers Service, and the Department for Works and Pensions (including Jobcentre Plus), and their employees or agents to search for apprenticeship vacancies and pass details to citizens and clients for the purpose of providing careers advice and guidance.

**Annex 1c: National Careers Service**

Inspire 2 Independence Ltd collects data to enable delivery of the services requested. Some optional demographic information (for example, ethnicity, declared disability) is requested to enable the ESFA to monitor the performance of the service against equality and diversity objectives, and to ensure that the ESFA is targeting the service to meet priority audience groups.

Further details about the service are provided on the National Careers Service website.

**Annex 1d: European Social Fund**

The ESFA funds education and training programmes in England for reducing unemployment and improving the prospects of people in work with support from the European Social Fund (ESF).

ESF pays half the costs and the ESFA matches this with government funding for education and training. Personal data for ESF directly funded learners is collected for the Department for Work and Pensions (DWP) and is used to monitor and report on the effectiveness of the programme. Other learners, from the ESFA's own work related programmes, are matched to ESF participants, for the same purposes – and are called match learners. Both Direct and Match learners may be contacted by the ESF English Managing Authority, the DWP or its agents to carry out research and evaluation to inform the effectiveness of the programme. For direct funded learners on ESF programmes, both the DWP and the SFA are data controllers. Further information on the ESF programme is available on GOV.UK.

Further information about how ESFA and ESF handles your data can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/652095/ESFA\\_privacy\\_notice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652095/ESFA_privacy_notice.pdf)

## **Annex 2: DWP Participants**

The Department for Work and Pensions (DWP) pays half towards the costs of employment related programmes. Personal data is collected to deal with a variety of areas including:

- social security (including Housing Benefit, Council Tax Reduction Schemes and Local Welfare Provision)
- child support
- employment and training

The information the DWP collects about you depends on the reason for your business, but they may use the information for any of these purposes. The DWP may also check information that they collect about you with other information they have.

The DWP may share your information for a number of reasons, including to:

- check the accuracy of information
- help people with particular difficulties, such as troubled families
- help people get or stay in work
- help people get education and training to improve their chances of getting work
- support people with independent living, including home help and respite care
- prevent or detect crime
- check payments for services
- protect public funds in other ways
- use for research or statistical purposes.

Further information can be found at:

<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>