

# LEARNER PRIVACY NOTICE

## (PROCESSING YOUR PERSONAL DATA)

Please read this information before you enrol

**This privacy notice establishes Alliance Learning's procedures governing the collection and release of learner information and is provided to learners at the application and enrolment stages.**

### General

Alliance Learning needs to collect, process and use personal data (information) for a variety of purposes about those who express an interest in becoming a learner of Alliance Learning (prior to sign-up stage), those who become enrolled learners of Alliance Learning including, its staff and other individuals who come into contact with Alliance Learning.

In collecting, processing and using data Alliance Learning must comply with the requirements of the Data Protection Act 2018 (DPA) and from 25 May 2018 with the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR) which govern the processing of personal information. Alliance Learning Data Protection Policy sets out the rules for adherence to the requirements of data protection laws and is available at <https://www.alliancelearning.com>.

Personal information means any information relating to an identified or identifiable living person. An identifiable person is one who can be identified, directly or indirectly, in particular by an identifier such as a name, identification number, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. Processing is any activity carried out involving personal information, including holding and storing it in any format, both digital and hardcopy.

Alliance Learning takes the matter of data security and protection extremely seriously. The personal data you provide to us during the sign-up procedure and throughout your time as a learner is securely held by Alliance Learning and will be treated confidentially and with sensitivity. Alliance Learning is notified as a Data Controller for all personal information that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller.

Alliance Learning's Information Commissioner's Office data controller registration number is Z5608898.

If you have any questions about our privacy practices, please contact Chief Executive.

How to contact us: Chief Executive

Email: [quality@alliancelearning.com](mailto:quality@alliancelearning.com)

Address: The Hurst Building  
Chorley New Road  
Horwich  
Bolton  
BL6 5UE

## **Changes to this privacy notice**

It is important that you check this privacy notice for updates. It is likely that this notice will undergo further revision ahead of the introduction of the GDPR. If we make changes that we consider to be important, we will let you know by contacting you using the contact details you have provided to us.

## **The types of personal information we collect**

Alliance Learning collects and processes information relating to its learners, including images, personal details, family and social circumstances, education and training records and financial details for administrative and contractual reasons. Alliance Learning may collect, hold and process what may be considered 'sensitive personal data' as described under the DPA and 'special category personal data' as described under the GDPR.

Sensitive and special category personal data is generally defined as information related to racial or ethnic origin, political opinions, religious or other beliefs, physical or mental health, other medical information including biometric and genetic data. In some instances, Alliance Learning will also collect and process criminal offence data relating to criminal allegations, proceedings, convictions or related security measures.

Not all of the personal information Alliance Learning holds about you will come directly from you. It may, for example, come from other organisations to which you belong or professional service providers. We also collect personal information from third parties such as collaborative partner organisations, service providers offering services provided by Alliance Learning, for example learner recruitment representatives, UCAS.

The government's guidance on Learner Records Service can be found at: <https://www.gov.uk/government/publications/lrs-privacy-notice/lrs-privacy-notice>.

## **Where we store and process personal information**

In certain circumstances Alliance Learning may transfer learner personal information to third parties located in countries outside of the European Economic Area. Any such transfers will be strictly in relation to the delivery of Alliance Learning's core services. For example, transfers of learner educational information to collaborative partner institutions abroad, IT services used by Alliance Learning may involve the transfer or hosting of learner personal data overseas or personal information may be shared with international agents that Alliance Learning uses for the delivery of services to overseas learners. All instances of overseas transfers of personal data are subject to appropriate and adequate safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

The European Commission decisions on the adequacy of the protection of personal data in third countries are published here: [ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en](https://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en).

The Education and Skills Funding Agency (ESFA)'s Privacy Notice can be found at: <https://www.gov.uk/government/publications/esfa-privacy-notice/education-and-skills-funding-agency-privacy-notice-may-2018>

## **How we secure personal information**

Alliance Learning takes data security seriously and uses appropriate technologies and procedures to protect personal information. Our information security policies and procedures are reviewed regularly and updated as necessary to meet our service needs, changes in technology and regulatory requirements. Further information on data security is published at: <https://www.alliancelearning.com>.

## How long we keep personal information

Information of your course registration and final reward will be kept permanently by Alliance Learning with more detailed information kept for specific retention periods. Alliance Learning's Records Retention and Disposal Policy detailing the retention period for different learner records is published at: <https://www.alliancelearning.com>.

## Your right to access and correct your personal information

Alliance Learning respects your right to access and control your information, we will respond to requests for information and, where applicable, will correct, amend or delete your personal information.

You have the following rights

- request access to your personal information that Alliance Learning holds;
- rectify inaccuracies in your personal data;
- be forgotten - that is your details to be removed from the systems that we use to process your personal data in certain situations;
- restrict the processing of personal data in certain situations;
- object to the processing of personal data in certain situations. For example, sending and receipt of direct marketing material;
- data portability - obtain a copy of your data in a commonly used electronic form in order to provide it to other organisations;
- object to automated decision making and profiling – object to decisions made by automated means without human intervention in certain circumstances;
- withdraw consent where that is the legal basis of processing.

Learners must ensure that all personal data provided to Alliance Learning is accurate and up to date. Any changes must be notified to [quality@alliancelearning.com](mailto:quality@alliancelearning.com).

If you are not happy with how Alliance Learning manages your personal information you should contact the Quality Manager in the first instance. If you feel that the complaint has not been dealt with to your satisfaction you can formally complain to [quality@alliancelearning.com](mailto:quality@alliancelearning.com).

You also have a right to complain to the Information Commissioner's Office about the way in which we process your personal data at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

## Learner and Leavers Surveys

You may be asked to provide information about your experience as a learner and your activities after you complete your qualification/apprenticeship as part of national surveys used to create statistics to meet the public interest in the outcomes of higher education. The surveys may be undertaken by Alliance Learning or by an organisation contracted for that purpose. Alliance Learning will hold your contact details after you achieve your qualification in order for you to be contacted to complete a survey.

After you complete your qualification, Alliance Learning may contact you to ask you to complete a leaver survey.

## How we process your personal information – legal basis for processing

It is necessary for Alliance Learning to collect, process and use learner data in order to perform the contract between you and Alliance Learning in providing teaching and education support services to learners.

Alliance Learning processes your personal data and sensitive and special category personal data for the administration and management of all services and processes relating to you. For example, learner recruitment, admission, registration, teaching and learning, attendance monitoring, examination, and other services such as learner support services and careers advice. Information is shared between delivery and professional support services of Alliance Learning for operational purposes as is necessary and proportionate for the intended purpose.

Some processing activities may also be carried out under a legal obligation (for example, disclosing personal data to external parties under statutory powers), where it is necessary to protect the vital interests of the learner or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals), where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements), or where it is necessary for legitimate interests pursued by Alliance Learning or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases do not apply, the consent of an individual to process their personal data will be sought.

Where learners' sensitive personal data and special category personal data is collected and processed by Alliance Learning this will be on the legal basis of explicit consent of the learner, employment or social security/protection requirements, protecting the vital interests of the learner or another party, the exercise or defence of a legal claim, reasons of substantial public interest, purposes of medical or health care or where the information has been made public by the learner. Any processing will be proportionate and relate to the provision of services by Alliance Learning.

Table A below sets out the separate categories of personal information that Alliance Learning may hold, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

### **When we share personal information**

This privacy notice includes information about who Alliance Learning may disclose learner's personal data, sensitive and special category personal data and criminal offence data to and how learner data is used.

Table A below sets out what information Alliance Learning may share with other third parties.

Table A below sets out the separate categories of personal information that Alliance Learning may hold on you, what its purpose is, where the information is located, the method of data processing used, who we share your personal data with and the legal basis for processing that information.

**TABLE A**

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
1	<p><b>Personal Details</b> for the programme sign-up. Equal Opportunities monitoring. Inclusion of photographic images on Alliance Learning's computerised eportfolio system.</p> <p>Name, address (term-time and home), e-mail, telephone numbers, gender, date of birth + age, ethnicity, disability, nationality, qualifications on entry, previous education, emergency contact details.</p>	Manual and electronic	Management Information System (MIS)	Individual Learner Record (ILR), personal file,	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
2	<p><b>Vacancy</b> tracking, contact analysis, equal opportunities monitoring.</p> <p>Personal details as in 1 above, previous educational establishment, referees and references, correspondence, decision.</p>	Manual and electronic	Electronic Resource Planning (ERP)	Applicant database, vacancy database	Alliance Learning	Article 6(1)(b) or (1)(e) or (1)(f)
3	<p><b>Registration for Award.</b> Qualification aim, join and end dates,</p>	Manual and electronic	Awarding Organisation online database.	Enrolment form, personal file, PICS	Alliance Learning and External	Article 6(1)(c) or (1)(e) or (1)(f)
4	<p><b>Academic assessment and progression.</b></p> <p>Attendance/timesheets/change in learner status.</p>	Manual and electronic	Management Information System (MIS) and E-Portfolio System.	Personal file, notice boards, enrolment records	Alliance Learning and External	Article 6(1)(c) or (1)(e) or (1)(f)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
5	<b>Administration of learner related policies and procedures</b> including appeals, complaints, grievances, disciplinary matters, and matters relating to health and conduct and to cheating and plagiarism (unfair means).	Manual and electronic	Management Information System (MIS) and E-Portfolio System.	Recorded in Notes area on PICS.	Alliance Learning and External	Article 6(1)(b) or 6(1)(c) or (1)(e) or (1)(f)
6	<b>Interview records/reports for further action/record</b> as requested/applicable. Personal details as in 1 above plus course details, NI number, advice and guidance needed and given, dates of appointments, interviews, meetings, action taken, reports, communications.	Manual and electronic	Business Support, E-Portfolio System, Management Information System.	Personal Records in relevant file.	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
7	<b>Off-campus activities</b> for, insurance, charges, attendance report. Visits, field trips, risk assessments.	Manual and electronic	Student Support	List of participants, registers	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
8	Certificate printing for issue to successful learners. Name of learner and Award gained, issue/collection of certificate.	Electronic	Awarding Organisation online database.	Certificate; certificate issue lists	Alliance Learning and External.	Article 6(1)(b) or (1)(e) or (1)(f)
9	<b>Processing and recovery of accounts and fees.</b>  <b>CO-FUNDING/LEVY</b>  Course Fees for invoicing. Fees for academic year, ESFA/learner, Amounts paid, date invoiced.	Manual and electronic	PICS and Accounts	Enrolment paperwork; invoices; credit and debit lists;	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
10	<b>Awards Ceremonies</b> for invitation of nominated and finalist learners.  Invitations, photography.	Manual and electronic	Marketing – shared drive.	Tickets, awards ceremony database, attendance lists, trophy.	Alliance Learning	Article 6(1)(b) or (1)(f)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
11	<p><b>Research and statistical analysis.</b></p> <p>Surveys and questionnaires for monitoring and evaluation of provision, research and analysis. If not anonymous – Personal details as in 1 above, course details as in 3</p>	Manual and electronic	Quality team	Survey Monkey/E-Portfolio	Alliance Learning	Article 6(1)(b) or (1)(e) or (1)(f)
12	<p>Production of statistical returns required for third party government bodies e.g. the Education and Skills Funding Agency.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other Regulations</p> <p>Destination Data - career Destinations after leaving for processing. Name, qualification, address, employment/education/other after completing course, where known.</p>	Manual and electronic	Management Information System.	Electronic.	Alliance Learning and External	Article 6(1)(c) or (1)(e) or (1)(f)  Article 9(2)(j)
13	<p><b>Direct mailing</b> of or about (i) learner benefits and opportunities offered by or through Alliance Learning, (ii) activities and events organised for learners, (iii) services or career opportunities of direct relevance to learner interests and (iv) professional and industrial bodies wishing to communicate with learners about career opportunities and membership of their body.</p>	Electronic	Shared drive	Personal record in relevant file	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
14	<p><b>Administration of employment contracts</b> where the learner is employed by Alliance Learning.</p>	Manual and electronic	HR,	Personal record in relevant file	Alliance Learning and External	Article 6(1)(b) or (1)(c) or (1)(f)  Article 9(1)(b)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
15.	<p><b>Health and safety of individuals and their property</b> and the protection of Alliance Learning's assets, including the use of CCTV.</p> <p>Health &amp; Safety for first-aid assistance, emergency evacuation, hazard risk assessment, accident monitoring. Personal details as in 1 above. plus medical records and care plans, accident/hazard reports, consent records, first-aid action</p>	Manual and electronic	Student Support Shared drive	Personal record in relevant file;	Alliance Learning	Article 6(1)(b) or 6(1)(c) or (1)(d) or (1)(f)
16.	<p><b>Operation of a lecture capture facility</b> relating to the recording of educational activities e.g. lectures held at and by Alliance Learning.</p>	Electronic	Facilities	Video archive	Alliance Learning	Article 6(1)(b) or (1)(e) or (1)(f)
17.	<p><b>Police or other regulatory body</b> where pursuant to the detection, investigation or disclosure of a potential crime.</p> <p><b>Information to 3<sup>rd</sup> Parties</b> for compliance with statutory and other Regulations applicable to Alliance Learning. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports and information supplied.</p>	Manual and electronic	All	Personal record in relevant file(s) CCTV, any other electronic evidence necessary	Alliance Learning and External	Article 6(1)(d) or (1)(f)
18.	<p><b>Close family and emergency services</b> where there is an emergency situation</p>	Manual and electronic	Business Support	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(d) or (1)(f)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
19.	<b>External examiners for the purposes of assessment.</b>	Manual and electronic	Business Support	Personal file; PICS	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
20.	<p><b>Home Office and other international and national governmental and regulatory bodies</b> in connection with the assessment of learner status.</p> <p>Information to 3<sup>rd</sup> Parties for compliance with statutory and other regulations applicable to Alliance Learning. Personal details as in 1 above, course details as in 3 above, correspondence and notes of requests, reports, and information</p>	Manual and electronic	Business Support	Personal record in relevant files	Alliance Learning and External	Article 6(1)(b) or 6(1)(c) or (1)(e) or (1)(f)
21.	<p><b>Third parties accessing information about learner awards</b> - ranged by department and for the verification of awards to employers and other educational institutions.</p> <p><b>Sponsors</b> Attendance/Academic Marks, Results and Progress, if requested by employer or other third party sponsors, who are paying a learner's fees</p>	Manual and electronic	Business Support	Learner records	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
22.	<p><b>Other educational institutions involved in the delivery of a learner's course or programme</b>, e.g. affiliated colleges, exchange institutions, including those outside of the UK and sometimes the EEA; and to other organisations in relation to work placements.</p> <p><b>External Registration</b> for Award. Name, date of birth, gender, postcode, funding status,</p>	Manual and electronic	Business Support	Learner records; registration lists	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
23.	<b>Professional bodies</b> where registration with that body is related to or a requirement of the learner's studies e.g. CMI	Manual and electronic	Business Support, CMI Hub	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
24.	<b>Banks (and other payment agencies</b> you may use), family, sponsors or other third parties to enable them to pay learner debts.	Manual and electronic	Accounts	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
25.	<b>External agencies</b> - which may be based outside the European Economic Area - in connection with procedures for guarding against plagiarism. (OneFile, PICS)	Electronic	E-portfolio PICS	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(e) or (1)(f)
26.	<b>Data Processors</b> in order for them to process data on behalf of Alliance Learning for any of the purposes for which Alliance Learning is permitted to process the data, including the provision of academic and academic related services by Alliance Learning.	Manual and electronic	Shared drive	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(b) or (1)(e) or (1)(f)
27.	<b>Provision of references</b> for learners or former learners.	Manual and electronic	Shared folder	Do not retain	Alliance Learning	Article 6(1)(e) or (1)(f)

No	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
28.	To Alliance Learning's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Finance;	Personal record in relevant file(s)	Alliance Learning and External	Article 6(1)(c) or (1)(e) or (1)(f)

**All learners agree to Alliance Learning processing their “sensitive and special categories of personal data” for the following purposes and for release to the following third parties:**

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
29.	To professional bodies where registration with that body is related to or a requirement of the learner's studies	Manual and electronic	Business Support PICS	Personal record in relevant file(s)	Alliance Learning and External	(see No 23 above) and Article 9(1)(a) or 9(1)(h)
30.	To other bodies involved in the delivery of the course or programme e.g. affiliated colleges, for the purpose of statistical analysis and programme administration.	Manual and electronic	Business Support	Registration lists	Alliance Learning and External	(see No 22 above) and Article 9(1)(a) or 9(1)(g)
31.	For the assessment and provision of services to disabled learners.	Manual and electronic	Student Support Facilities	Fire attendance lists Care Plans	Alliance Learning and External	(see No 10 above) And Article 9(1)(a) or 9(1)(h)

No.	Type of information held and purpose	Method of data Processing	Location of data	Data Format	Alliance Learning and/or External Needs	Legal Basis for Processing (Article 6)
32.	To Alliance Learning's external lawyers, insurers in respect of accidents occurring within the institution and external auditors.	Manual and electronic	Facilities	personal record in relevant file(s)	Alliance Learning and External	(see No 28 above) And Article 9(1)(f)