

# PRIVACY STATEMENT

## Summary

This notice provides a summary of the full **Strive Training (London) Limited** Privacy Statement. Both the notice and the **Strive Training (London) Limited** Privacy Statement apply to information collected by Strive Training (London) Limited via their centres and in any manner described in the **Strive Training (London) Limited** Privacy Statement.

### Personal Information

**Strive Training (London) Limited** collect personal data about you when you are referred to us as a learner. At enrolment, we may ask you for sensitive personal data and special category data as well as for your consent to use it for a specific purpose. This data is required for **Strive Training (London) Limited** to provide our learning programs, comply with governmental legislation and adhere to mandatory health and safety standards.

**Strive Training (London) Limited** share some of your personal data with the Education & Skills Funding Agency. The ESFA through their Learner Registration Service allocates Unique Learner Numbers (ULNs) which enable individuals to access their participation and achievement data. The ESFA will share your ULN with **Strive Training (London) Limited** Ltd along with your achievement data when you enrol on one of one of Strive Training course, so long as you are happy for the SFA to do so.

**Strive Training (London) Limited** share information with Department for Work and Pension (DWP) which encompasses Job Centre Plus and Universal Credits, plus any future associated organisations as well as Work Programmes, if you have been referred to **Strive Training (London) Limited** Ltd by them.

If government funding is available for your course, we collect personal data from you to see if you can have that funding. This information is shared with the organisation sponsoring the course. These include but are not limited to **Strive Training (London) Limited** Ltd, Harrow Council, Southwark Council, Barking and Dagenham College, Eastleigh College, Central Bedfordshire College, West Thames College, Milton Keynes College, People Plus, Barnet College, Thameside, NOVUS – Manchester College and Seetec. Your information will only be shared with the organisation that is providing funding for your course.

When you access your course materials we collect information (Workbooks, CV data) about how you use those materials. These materials are used to prove that the qualification has been achieved.

You may provide **Strive Training (London) Limited** with further personal data if you use one of our learning or communications facilities or use one of our online skills tests including BKSB, Evolve, plus any future associated software which will believe is in the benefit of the learner.

**Strive Training (London) Limited** use cookies and other technologies to keep track of how you interact with our website.

### Purposes and Disclosures

**Strive Training (London) Limited** use your personal information to deal with your queries, to provide you with the services you request, enrol you on to relevant qualifications, to determine whether you are

eligible for government funding (if available), customer feedback and for general statistics and research. Depending on the preferences indicated by you, we may use your personal data to contact you about **Strive Training (London) Limited** developments and offers.

**Strive Training (London) Limited** may disclose your personal data to your sponsor, if you are being sponsored by your employer or by a trade organisation or other group.

**Strive Training (London) Limited** may disclose your information to third parties who may take over some or all of the Strive Training (London) Limited business in the future.

**Strive Training (London) Limited** may disclose your information to certain government agencies in connection with the funding of your course.

If you enrol in a **Strive Training (London) Limited** centre, we will disclose your personal data to our data administration team as well as your Tutor that will be delivering and supporting your learning (who may use it for any of the above purposes).

Following registration and enrolment, at a **Strive Training (London) Limited** centre, all of our data administration team will have access to personal data, sensitive personal data and special category data along with you ULN number and details of which **Strive Training (London) Limited** courses you have enrolled on in the past.

**Strive Training (London) Limited** only share and copy data if it's essential for providing the service. Sensitive personal data and special category data is only shared with governmental organisation, colleges and councils for legal compliance and funding which is required to manage the training process.

## Your Choices and Important Information

You can request that:

- Your details not be used for marketing purposes;
- We correct inaccuracies in your information.
- A copy of the information we hold about you. We will charge you a small administration fee of £10 for this service. For a request of information, please fill in the following form and return to the Data Protection Officer at [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk).
- Under new General Data Protection Regulation (GDPR) legislation (May 2018) you now have a legal right to have your data erased. To request erasure, please complete the following form and send back to the Data Protection Office at [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk).

Please note that the right to the erasure of personal data will only apply where there is no legitimate reason for Strive Training to continue to process the personal data. There will usually be a requirement for Strive Training to keep a basic student record indefinitely for legal compliance.

Your personal data is protected by UK data protection law, including General Data Protection Regulation (GDPR) Act 2018. You can find the details for the UK Information Commissioner at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

You can access more information on our privacy practices in the [full Privacy Statement](#).

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## How to contact us

To obtain a copy of your personal data, to correct inaccuracies or if you have any queries or concerns about how we handle your personal data, please contact:

**Address:** Strive Training, 10 Spectre House, Spring Villa Park, Spring Villa Road, London, HA9 7EB:

**Phone:** 0208 952 485

**Email:** [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk)

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# FULL PRIVACY STATEMENT

## Our commitment to privacy

This privacy statement explains how **Strive Training (London) Limited** (referred to as "we", "us" or "Strive Training") collects information from you via there centres, website or any other manner expressly described in the privacy statement and how this information is then used. When you provide us with your personal data you consent to us processing all such personal data as set out in the privacy statement. Please read this privacy statement carefully and revisit this page from time to time to review any changes that we may have made.

If you have any questions, comments or concerns about how we handle your personal information, please ring us on **0208 952 4856** or email us at [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk)

## Outline of Full Policy Statement Below

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- Enrolment
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## Referrals - Giving information for other people

When you give us information about another person, the other person must have agreed to let:

- us process all their personal data; and
- you receive any data protection notices for them.

When you send information for someone else, you are confirming that you have told them :

- which data they must give;
- which information is voluntary; and
- how they can access and, if necessary, correct the data we hold about them.

The information we collect during the referral process:

When you referred to us, you (or the person enrolling you) must tell us personal data:

- Full name;
- Date of birth;
- Primary contact number;

We also require the following sensitive personal data.

- National Insurance Number

Before you enrol, we will create for you a BKSB and Employability Plus Username and Password. These will be disclosed to you at enrolment.

## Enrolment

When you enrol with us, you must provide the following data to us:

### Personal Data:

- Your Full name
- Your Title
- Any previous names which you might have had.
- Your date of birth;

### Sensitive Personal Data:

Your National Insurance Number

- A primary telephone number;
- Your current address
- A previous address if you have been at the current address less than 3 years
- Your Nationality
- Citizenship Status

### Special Category Data:

- Prior Attainment Levels in Education
- Previous School and College including your previous grades.
- Your unemployment status
- Whether you are in receipt of state benefits
- Ethnicity
- Learning difficulties
- Health problems
- Household situation
- Criminal record (including information about criminal proceedings & suspected criminal activities).

We also request other information including your middle name, email address and next of kin, but you don't have to give us these details.

At or before enrolment you may be asked for sensitive personal information. This data is required for Strive Training to provide our learning program, comply with governmental legislation, funding and adhere to mandatory health and safety standards.

### Identification

During enrolment we will also require proof of who you are. Therefore, a type ID will need to be viewed and copied. By providing this ID you are consenting to Strive training holding a copy for the verification process only. Any one of the documents listed below are valid for this verification process (only one needs to be presented):

- A Valid EU Passport
- A valid UK Driving Licence
- A Birth certificates
- A Marriage licences

All original identifications will be handed immediately back to the learner once copied and all copies will be destroyed once Identification has been scanned onto a secure server.

Please note that Strive Training does provide the service of ordering Birth Certificates for learners upon request. This service is free, and the original copies will be sent back to learners once they have been processed. We use all this information to check whether you are eligible for funding. If you are not eligible then this information will be destroyed.

### Fee Remission - Proof of Benefit

During enrolment we will also require proof of benefit for a fee remission. Therefore, a type of document will need to be viewed and copied. By providing this document you are consenting to Strive training holding a copy for the verification process only. Any one of the documents listed below are valid for this verification process (only one needs to be presented):

- JSA Referral Letter
- ESA Referral Letter
- Universal Credit Statement
- Bank payment showing the most recent payment from the DWP
- Housing Benefit Award

Bank statements should have the account number and sort code redacted for data protection and security purpose.

We, or our approved service providers, may require additional information from you in order to support an application for funding. In certain instances, we will call you at a time of your choice and check all the above details with you and may request additional information, such as where you heard about us and if you have done any learning in the last three years, other information we may collect is set out in this Privacy Statement.

### Learner File & Qualification Registration:

When you start your learning we or a Service Provider will create a Learner File to hold the documents which relate to your learning and evidence of proof of identity and funding eligibility. As you progress through your learning other documents, including some of your course work, may be held on this file.

These include, but are not limited to Workbooks & Portfolios, CVs, Individual Learner Plans and Feedback forms.

Please note that when you enrol on a **Strive Training course** that leads to a qualification, we send non-sensitive personal information to the relevant awarding bodies so that they can undertake the administration associated with your qualification. These include, but are not limited to: City and Guilds, VTCT, iCQ and FDQ

### The information we collect when you access course materials

We collect information about how you use course materials to monitor your learning and improve our users' learning experience

### Other information we collect

If you require a free information pack, we ask you to provide us with the information on the "request more information" form on the website, including:

- Full name
- Email
- Phone Number
- Message including an indication of courses in which you are interested;

By submitting these details, you are allowing us and/or our approved service providers to contact you about **Strive Training (London) Limited** course and developments in this way

### How and why we use the information we collect:

We use your personal information and your Learner File:

- To answer your queries or complaints;
- To deliver our services, for example on-line tools to test your skills;
- To improve the quality of services;
- To support your application for government funding;
- To support your learning;
- To provide course materials;
- To carry out administration;
- To obtain customer feedback;
- For fee remission
- For general statistics and research;
- For obtaining any relevant professional advice;
- As it may be required by law or in connection with legal proceedings (including where we intend to take legal proceedings), or as may be necessary to establish, exercise or defend our legal rights.
- For recording accidents, injuries or illness while on the permission

### Third parties

To achieve the purposes set out in this privacy statement we may need to share your personal data, sensitive personal data, special category data and Learner File with our approved data administration team, organisations, council or college providing the funding for your fee remission, service providers, agents, professional advisors, software systems and applications, auditors and to your tutor(s) as well as another organisation to help us deliver our service to you and that is necessary required by legal compliance. Temporary access may be required by IT support services during fault repair, maintenance or updating processes. Period access may be required by matrix quality auditors and for annual quality assessments.

We may also give your information to third parties who may take over part or all of the **Strive Training**

**(London) Limited** business in the future, but only for the purposes outlined in this privacy statement. If your employer, or other organisation is sponsoring or supporting you, we may give the personal information we have collected to your sponsor to monitor your learning.

Communications between you and your tutor using any of the tools or functions we make available to you may be monitored by **Strive Training (London) Limited** staff to check the quality of tutor support.

**Strive Training (London) Limited** staff and auditors may also access these communications when we want to investigate or audit learner funding arrangements.

### Referral Partners

If we have received your details as a referral from one of our partners, we may be required by the referral partner to provide them with updates on the following areas:

- Attendance
- Progress
- Achievement/completion
- Outcome/destination
- Withdrawal

### Department of Work and Pension (DWP) Referrals.

If we receive your details via an organisation of the DWP or a Work Programme we are obliged to keep them informed of your progress. When you stop learning for whatever reason, Strive Training will have to inform the your DWP Organisation or Work Programme. This may result in sanctions being applied by the DWP, details of these are available from [www.direct.gov.uk](http://www.direct.gov.uk).

### Keeping you informed

We, and our approved service providers, will use your information to send you regular updates about:

- our services and materials
- new courses
- updates on achievements results
- specific activities such as customer feedback surveys and competitions.

If you enrol on a **Strive Training (London) Limited** course you will periodically be sent customer feedback surveys. We will never use your sensitive personal data for marketing purposes without your express consent.

### Fee Remission and Funding

We may use your personal data to process or to support any application made for funding associated with your learning. If government funding is available, we will share this information with the organisation sponsoring the course. These include but are not limited to Strive Training (London) Limited Ltd, Harrow Council, Southwark Council, Barking and Dagenham College, Eastleigh College, Central Bedfordshire College, West Thames College, Milton Keynes College, People Plus, Barnet College, Thameside, NOVUS – Manchester College and Seetec. Your information will only be shared with the organisation that is providing funding for your course.

For these purposes we, or our approved service providers, will share the information you supply with the Education and Skills Funding Agency (ESFA) in England. The ESFA may in turn share it with the European

Social Fund, or other government agencies. We may use a third-party service to verify your identity for funding eligibility.

Your personal data may also be shared with Office for Standards in Education, Children's Services and Skills (OFSTED) for annual quality checks.

We, or the government agency providing funding for your course, may use your personal data and Learner File to investigate a suspected misuse of public monies or other fraudulent activity by any person relating to your learning activity. In doing so, we, or the government agency providing funding for your course, may disclose your information to other government agencies (e.g. the Department for Work and Pensions) to establish whether there has been any duplication of funding for your course.

We may also contact you for the purposes of any such investigation.

## ESFA Privacy Notice

The ESFA requires that we also tell you about its own privacy notice so that you understand how the ESFA will use the information that we give them. It says:

*The ESFA generally collects data on behalf of the Secretary of State for the purposes of fulfilling the Secretary of State's statutory functions. Where the ESFA shares data with a third party who undertakes work for the ESFA, the ESFA 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, as informed to learners, 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. 2 of 5 In the event that a Further Education college or other training provider is unable to continue the delivery of training funded by the ESFA (for example, where a training provider is a limited company that is dissolved, the ESFA will endeavour to decide for secure transfer of information, including the learner's personal data, from the former training provider to another training provider to support the learner in their continued learning.*

*The security of the ESFA's systems which process, and store data are regularly reviewed in accordance with Government 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. If you have any questions or concerns about our collection, use, or disclosure of your personal information, please write to the ESFA's Information Manager, Chief Executive's Office, Cheylesmore House, Quinton Road, Coventry, CV1 2WT. Further information about use of and access to your personal data, and details of partner organisations are available 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)

## Statistics & Reviews

We and/or the approved service providers delivering and supporting your learning are also required to provide statistics to all the government agencies mentioned under the heading 'Funding' in order that they can carry out checks on our funding arrangements and our performance and for research and statistical purposes.

This helps us, and our approved service providers, to maintain our funding. Where such information is supplied, it is provided in an aggregated manner so that whilst such authorities may be aware of, for example, the number, geographic location and sex of persons using **Strive Training (London) Limited**, you cannot be personally identified from this information. However, we may provide information that identifies you (your name, date of birth, address and postcode) to the Department of Work and Pensions so that they can check whether **Strive Training (London) Limited** learners have progressed into employment and compile statistical information about such progression. You will not be identifiable from the statistical information compiled.



## Requests for information

If you have not registered as a learner but are simply making an enquiry or request for information, we will use your personal information to reply to your enquiry or request. We will not use this information for marketing purposes without your permission or unless you invite us to do so.

## Protecting your Data

We are registered (in our registered company name of Strive Training (London) Limited) with the Information Commissioners Office (ICO) in line with the UK Data Protection Act, 1998.

As a registered data controller, we are required to take appropriate technical measures to protect your personal information including making a regular backup of our system and data. We have security measures in place to make sure any personal information we collect is secure. All is on a secure server, which only a limited number of employees and sub-contractors can access. All parties with access to your information are subject to confidentiality obligation.

## Keeping your Data

We keep personal data and Learner Files:

- for as long as is necessary to fulfil the purposes we collected it for;
- to enforce or defend legal claims.
- as required by law;
- as required by government compliance.

Please note that Strive Training will only delete data where there is no legitimate reason for Strive Training to continue to process the personal data. There will usually be a requirement for Strive Training to keep a basic student record indefinitely for legal compliance.

## Tutors

When you are registered as a tutor by a Service Provider you accept that all activity is undertaken by you for the provision of Strive Training (London) Limited learning. Any comments, emails, or tutor notes or any other forms of communication placed by you on the Strive Training (London) Limited system will be retained, are visible to the relevant learner and authorised personnel within **Strive Training (London) Limited** and may be used as evidence of learner support.

## Your rights

You have the right to:

- Ask for a copy of all the information we hold about you (we will charge you a small administration fee of £10 for this) and to correct any inaccuracies. To obtain a copy of this information, please ring us on 0208 952 4856 or email us on [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk)
- Challenge the accuracy of data held about you.
- Take steps to prevent your personal data being processed if the processing is likely to cause you substantial damage or substantial distress which is unjustified.  
If you want to exercise this right you must put your objection in writing by emailing us, specifying why the processing has this effect and state what you require Strive Training (London) Limited to do to avoid causing damage or distress.
- If you make a data protection complaint, report a data breach, request data to be returned to you or request your data to be erased, please contact the data controller at [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk)

Under new General Data Protection Regulation (GDPR) legislation (May 2018) you now have a legal right to have your data erased. To request erasure, please contact the Data Protection Office at [datacontroller@strivetraining.co.uk](mailto:datacontroller@strivetraining.co.uk).

Please note that the right to the erasure of personal data will only apply where there is no legitimate reason for Strive Training to continue to process the personal data. There will usually be a requirement for Strive Training to keep a basic student record indefinitely for legal compliance. Your personal data is protected by UK data protection law, including General Data Protection Regulation (GDPR) Act 2018. You can find the details for the UK Information Commissioner at [www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

#### Other Information

You should note that if our business (or any part of it) is sold or transferred at any time, the information we hold may form part of the assets transferred although will still only be used in accordance with this privacy statement.