

This Privacy policy describes what Poultec Training Limited does with the personal information you provide it with.

It applies to information Poultec Training collects about:

- Visitors to Poultec Training's website
- People who use or may use Poultec Training's services. This includes for example:
  - individuals who undertake a course of study or apprenticeship through Poultec Training
  - employers who purchase training from Poultec Training
  - employers who take a student on work experience or placement
  - employers who employ an Apprentice
  - members of Poultec Training's staff
  - Individuals who request information from Poultec Training
- People who apply for a position at Poultec Training
- Staff employed by Poultec Training (workers, contractors or volunteers)

If you are asked to provide personal information to us, it will only be used in the ways described in this Privacy Policy.

If you have any questions about this policy, please contact the Data Protection Officer -

Associate Director - Communications	Leroy Burrell
Postal Address	Poultec Training Limited South Green Park Enterprise Centre Mattishall Dereham Norfolk NR20 3JY
Telephone	01362 850983
Email	<a href="mailto:data.protection@poultec.co.uk">data.protection@poultec.co.uk</a>

The categories of the information that Poultec Training collects, holds and shares includes, but is not limited to:

- Personal information (such as name, address, date of birth, national insurance number)
- Contact information (which may include phone number, email and postal address)
- The personal information of parents/guardians of students aged 16 to 18 (such as name, address, phone number and email address)

- Educational Information (including qualifications, predicted grades, learning support needs, attendance information – number of absences and reasons and individual achievements)
- Details of achievement, progress reviews and career plans
- Information disclosed in relation to safeguarding issues
- Characteristics (such as gender and/or sex and if the same as at birth, age, ethnicity, first language, nationality, country of birth)
- Financial information (such as bank details)
- Information about personal preferences and interests
- Photographs for student ID cards
- Company information (such as financial, staff, professional development records)
- Website usage data
- Recruitment information (which may include your name, address and contact details, including email address and telephone number; details of your qualifications, skills, experience and employment history; information about your current level of remuneration, including benefit entitlements; whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process; information about your entitlement to work in the UK; and equal opportunities monitoring information.
- Staff employment information (which may include contact information including next of kin, performance reviews, disciplinary or grievance process, contractual details (including remuneration and benefits), periods of absence (sickness, maternity, adoption, paternity) and equal opportunity monitoring data.

### **Changes to this Privacy Policy**

Poultec Training will keep this Privacy Policy under regular review and reserve the right to change it as necessary from time to time or if required by law.

### **How we use this data**

Your personal information will be used for purposes relating to education, training, employment, general advice services, well-being and research. Poultec Training may share non-sensitive personal information about you with other organisations as follows:

Most of the information is passed to Government agencies (including but not limited to the Education and Skills Funding Agency) to meet funding arrangements. Where necessary it is also shared with the Department for Education (DFE).

The information is used for the exercise of functions of these Government departments and to meet statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009. It is also used, in collaboration with the appropriate organisations, to create and maintain a unique learner number (ULN) and a Personal Learning Record (PLR).

Data is used by Poultec Training:

- to process applications, enrolments and staff development programmes and contracts
- for Poultec Training's own internal records so that it can provide you with a high quality service

- production of student identification cards
- to contact individuals in response to a specific enquiry
- to customise Poultec Training's services so they work better for individuals
- to contact individuals about services, products, offers and other things provided by Poultec Training which it thinks may be relevant
- to contact individuals via email telephone or mail for research purposes.
- to process job applications, including assessing the suitability of job applicants for the role applied for and if necessary carrying out background checks with third parties.
- to process data to enter into an employment contract with staff and to meet its obligations under both employment contracts and fulfil legal obligations.

At no time will Poultec Training assume permission to use information that is provided for anything other than the reasons stated here.

The information provided 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 safeguarding for example. This will only take place where the sharing is in compliance with the GDPR.

We seek consent to take photographs of students for use on the Poultec Training's website, to be shared with the press, or to be used in the production of marketing materials. This consent is gathered explicitly via a consent form which lays out the exact usage of these photographs and the duration for which they are stored on secure systems.

Individuals may be contacted after they have completed their programme of learning to establish whether they have entered employment or gone onto further training or education. Individuals may be contacted by the European Social Fund (ESF) Managing Authority, or its agents, to carry out research and evaluation to inform the effectiveness of the programme. Information may be shared with the ESF for this purpose.

Further information about use of and access to personal data, and details of organisations with whom the data is regularly shared, please visit <https://www.gov.uk/government/publications/privacy-notice-for-key-stage-5-and-adult-education>.

Poultec Training has identified that it meets a number of lawful basis for processing (as set out in Article 6 of the GDPR). In summary:

- For processing enquiries and applications to Poultec Training the lawful basis is legitimate interest
- For processing information relating to enrolled students' programmes of study the lawful basis is legal obligation and public task
- For gathering information about the destination of an individual once they have left Poultec Training the lawful basis is legitimate interest

## **Security**

Poultec Training will hold personal information securely

To prevent unauthorised disclosure or access to personal information, it has strong organisational and technical security safeguards. If information is shared with another organisation (reasons for this are given in the section below) it will ensure an Information Sharing Agreement is in place.

Poultec Training follows stringent procedures to ensure it processes all personal information in line with the GDPR.

## **Information Sharing and Disclosure**

Poultec Training does not sell or rent personal information. Information may by necessity be disclosed to appropriate staff members of Poultec Training and to Government Bodies (as previously outlined). Organisations that Poultec Training may share personal information with includes:

- Awarding Bodies/EPAO's
- Department for Education
- Education and Skills Funding Agency
- Employers
- Local authorities
- Mailchimp
- Ofsted
- Contracted service providers (Pellcomp, OneFile Limited, AccessplanIT)
- Nominated pension provider
- HMRC

Parental consent is not required for the processing of personal data in relation to students applications or enrolments. There may be exceptions in regards of students with severe learning difficulties and those who are otherwise unable to decide for themselves.

Poultec Training has found that it is very beneficial to the young person's progress as a student if Poultec Training is able to engage with the parents (or guardian/carer). Therefore, it is very important that we have the parents' details recorded on its systems.

## **Retention of Data**

Data is only retained for the period of time to satisfy legal and contractual requirements. After this period of time, the data is securely destroyed. Our data retention periods are summarised as follows:

- EFSA funded delivery – 6 years
- Non-funded delivery – 6 years
- External communications (e.g. email) – 7 years
- Recruitment Records – 12 months from end of recruitment process

- Employee Records – 5 years from last day of employment

## **Visitors to Website**

### *Controlling Information about Individuals*

When individuals fill in a form or provide their details on the Poultec Training's website, there may be one or more tick boxes allowing them to opt in to receive marketing communications from the organisation by e-mail, telephone, text message or post.

If individuals have agreed that Poultec Training can use their information for marketing purposes, individuals can change their mind easily, via one of these methods:

- send an e-mail to [data.protection@poultec.co.uk](mailto:data.protection@poultec.co.uk)
- write to us – The Data Protection Officer, Poultec Training Limited, South Green Park, South Green, Mattishall, Dereham, Norfolk NR20 3JY
- unsubscribe by clicking the link in each email

Any individual can request that Poultec Training delete their personal data. This request for erasure can be made by e-mailing the Data Protection Officer at [data.protection@poultec.co.uk](mailto:data.protection@poultec.co.uk).

Whilst GDPR doesn't provide an absolute right to have your personal information deleted by an organisation (for example they do not need to delete personal information if they are obliged to keep it by law or have another legitimate reason to keep it) Poultec Training will review each request for erasure on a case by case basis.

### *Links from Poultec Training's Website*

Poultec Training's website may contain links to other websites. Please note that the organisation has no control of websites outside of [www.poultec.co.uk](http://www.poultec.co.uk). If an individual provides information to a website to which Poultec Training links, it is not responsible for its protection and privacy. Individuals are advised to read the privacy policy or statement of other websites prior to using them.

### *Use of Cookies*

We use cookies for the following purposes:

- to help us to analyse the use and performance of our website and services (cookies used for this purpose are: Google Analytics)
- to store your preferences in relation to the use of cookies more generally (cookies used for this purpose are itemised below)
- to provide website functionality, such as securing our application form

### *Cookies used by our website*

We use `exp_cookies_allow`, `exp_cookies_accepted` or `exp_cookies_declined` to track and respect your choices. Around all our websites we use cookies to remember where you are and to help and protect you.

We use exp\_last\_activity so every time the page is reloaded the last activity is set to the current date and time. It is used to determine form or login expiry. This is essential for logged in users to record their data and not lose it as it is being input. The expiry time 12 months.

exp\_sessionid Set by the site to maintain your secure login session. Used only for logged in members. Expiry time: session.

exp\_expiration Determines the length of the session for a logged in user. Expiry time: session.

exp\_anon A flag set by the user to determine if you are listed in the online users. This defaults to no. Expiry time: session.

exp\_last\_visit sets the date and time that the you last visited the site. Affects guests and logged in users. The expiry time is 12 months.

exp\_tracker tracks the last 5 pages you viewed and is used primarily for redirection after some actions on the site ie moving back to pages. This affects guests and logged in users. This cookie expires when you leave the site.

We also use exp\_csrf\_token. This cookie protects against Cross Site Request Forgery (CSRF). A CSRF attack forces a logged-on victim's browser to send a forged HTTP request, including the victim's session cookie and any other automatically included authentication information, to a vulnerable web application. It expires from your computer after one hour.

course\_id stores the course id number applied for. The expiry time is 24 hours.

mis\_app\_id, application\_id store your course application number. The expiry time is 24 hours.

mis\_app\_apprenticeship set only if your application is for an apprenticeship. The expiry time is 24 hours.

apprenticeship\_vacancy\_reference Reference number for apprenticeship vacancy applications. The expiry time is 24 hours.

application\_review Set if you are reviewing your application before sending. The expiry time is 24 hours.

mis\_app\_token Stores a token to secure application to a particular applicant. The expiry time is 24 hours.

#### *Cookies used by our service providers*

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. Google Analytics uses the following cookies:

\_ga – Used to distinguish users. Expires after 2 years.

\_gid – Used to distinguish users. Expires after 24 hours.

\_gat\_UA-11069238-1 – Used to throttle request rate. Expires after 1 minute.

We use Google Maps to show you our site locations on our website. Google Maps can set the following cookies to measure the number and behaviour of Google Maps users: SID, SSID, HSID, NID, PREF. Most expire after 6 months.

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

## **Use of Poultec Training's Services**

### *People who use Poultec Training's services*

Poultec Training holds the details individuals provide in order to deliver programmes of study, Apprenticeships, short courses and other services which meet specific needs. It only uses these details to provide the service an individual has requested and for other closely related purposes. For example, it might use information about people who have enquired about a course, to carry out a survey to find out if they are happy with the level of service they have received or it might use information about an employer offering a student work experience to contact them about a new Apprenticeship scheme or grant.

Information may by necessity be disclosed to appropriate staff members of Poultec Training and to Government Bodies [to fulfil Poultec Training's statutory responsibilities] such as the Education and Skills Funding Agency, Ofsted, the Department for Education and auditors or local partners.

## **Information Requests**

### *People who request information from Poultec Training*

If an individual requests information from Poultec Training by letter, telephone, email, completing an enquiry form or from an appointment, Poultec Training will make a record of that enquiry and will use the information to provide the individual with a response. It will only use the information for this purpose and to provide a follow up service to ensure that it provided the individual with what they asked for.

### *Accessing Your Own Personal Information*

Individuals have the right to ask for a copy of any of their personal information held by Poultec Training. They can make a 'subject access request' under the GDPR. Any request should be made directly to the Data Protection Officer at [data.protection@poultec.co.uk](mailto:data.protection@poultec.co.uk)

### *Requests to delete personal data*

One of the key principles which underpins the GDPR is the right of an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing. This is also known as the right to be forgotten.

Any requests from individuals to:

- have inaccurate personal data rectified (right to rectification)
- restrict or suppress their personal data (right to restrict processing)
- obtain and reuse their personal data for their own purposes across different services (right to data portability)
- object to how their personal data is used

should be made directly to the Data Protection Officer at [data.protection@poultec.co.uk](mailto:data.protection@poultec.co.uk)

### Complaints or Queries

If there are any questions about Poultec Training's collection and use of personal data please contact the Data Protection Officer at [data.protection@poultec.co.uk](mailto:data.protection@poultec.co.uk). They are happy to provide additional information if it is required.

If you have a concern about the way Poultec Training has handled or is handling your personal information, or you wish to make a complaint because we have not complied with our obligations, you can make a complaint to the Information Commissioner's Office (ICO). You should raise your concerns within three months of your last meaningful contact with Poultec Training. Details of how to do this are on the Information Commissioner's Office website.



Edward Bales  
Managing Director  
1st September 2023

<b>Policy Review</b>	This policy will be reviewed annually by the Senior Management team or when there are changes in the workplace such as new tools, systems or conditions.
<b>Approval Dates</b>	This version takes effect from: 1st September 2023