

<b>TITLE: Privacy Notice for Apprentices</b>	REF: HSA011	VERSION: 4
APPROVAL BODY: GM	DATE: 1.6.21	REVIEW DATE: June 2027
LEAD PERSON: Data Protection Officer		
<b>VERSION</b>	<b>REVIEWER/APPROVAL</b>	<b>REVIEW NOTES</b>
Version 1 – June 2021	<i>John Pitchforth</i>	On behalf of the Senior Management Team
Version 2 – May 2022	<i>John Pitchforth</i>	On behalf of the Senior Management Team
Version 3 – 04.03.2025	<i>John Pitchforth</i>	On behalf of the Senior Management Team
Version 4 – 01.06.2026	<i>Georgie Mann</i>	On behalf of the Senior Management Team

## Privacy Notice for Apprentices at the Heritage Skills Academy

You have legal right to be informed about how our organisation uses any personal information that we hold about you. To comply with this, we provide this privacy notice explaining how we collect, store and use your personal data.

Heritage Skills Academy (HSA) is the 'data controller' for the purposes of data protection law.

We process personal data in accordance with:

- **UK General Data Protection Regulation**
- **Data Protection Act 2018**

**Our Data Protection Lead is Georgie Mann - [gm@heritageskillsacademy.co.uk](mailto:gm@heritageskillsacademy.co.uk)**

**We may hold the following information about you:**

- Your contact details
- Your learner records
- Your attendance records
- Your characteristics (e.g. ethnic background, special educational needs)
- Any medical conditions you have
- Photographs
- CCTV images

We only collect data that is necessary for education, safeguarding, funding, and legal compliance purposes.

### Why we use this data

We may use your data to:

- Contact you, your employer, or parents/carers where necessary
- Monitor your progress and identify support needs
- Track organisational performance and funding requirements
- Support your wellbeing and safeguarding needs
- Meet legal and funding obligations set by government bodies

### **Lawful Basis for Processing**

We only use your personal data where the law allows us to.

We rely on the following lawful bases:

- Compliance with a legal obligation
- Performance of a public task (providing education and training)
- Consent (in limited cases such as optional photography or marketing)
- Protection of vital interests (where safeguarding concerns exist)

Where consent is used, you may withdraw it at any time.

Different types of data are processed under different lawful bases depending on the purpose (for example: safeguarding, funding, and education delivery).

### **Collecting Your information**

In most cases, you or your employer must provide the personal information we need.

We will always explain:

- Whether providing information is mandatory or optional
- What the consequences are if you do not provide required information

### **How we store this data**

We keep personal data while you are enrolled with HSA.

We retain personal data in line with our retention schedule, after which it is securely deleted or anonymised.

We may keep data after you leave if required by law or funding rules.

### **Data sharing**

We do not share your personal data without lawful reason.

We may share data where required with:

- Education and funding bodies such as ESFA and DfE
- Ofsted
- Your employer, family or authorised representatives
- Awarding organisations and assessors
- Local authorities and safeguarding partners
- Financial organisations
- Government departments
- Auditors and regulators
- IT, MIS, and service providers
- Police, courts, and legal authorities where required

### **Government Data Collections**

We are required to provide information about you to government bodies such as the Department for Education and the Education and Skills Funding Agency.

### **International Data Transfers**

Where we transfer personal data outside the UK, we ensure appropriate safeguards are in place in accordance with UK data protection law, such as:

- UK adequacy regulations, or
- Standard contractual clauses approved under UK GDPR

### **Your rights**

You have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion or restriction (where applicable)
- Object to certain types of processing
- Request data portability
- Withdraw consent where consent is used

### **Subject Access Requests**

You may request access to your personal data.

We will respond where we are satisfied that you are able to understand your rights and the implications of your request.

- We will provide:
- A description of the data held
- The purpose for processing
- Retention periods (where available)
- Sources of data
- Who it has been shared with
- Copies of your personal data

### **Automated Decision Making**

We do not make decisions about you solely using automated systems.

If this changes, we will update this notice.

### **Security of Your Data**

We take appropriate technical and organisational measures to protect your personal data against:

- Loss
- Misuse
- Unauthorised access
- Disclosure or alteration

### **Complaints**

We take data protection complaints seriously.

You can contact our Data Protection Officer:

Georgie Mann – gm@heritageskillsacademy.co.uk

If you are not satisfied, you may complain to:

The Information Commissioner's Office (ICO)

- <https://ico.org.uk/make-a-complaint>
- 0303 123 1113

**Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Lead on [gm@heritageskillsacademy.co.uk](mailto:gm@heritageskillsacademy.co.uk).