



Westwood Training and Consultancy

Privacy Notice

Purpose

WTC collects data for processing on a lawful basis where:

- Processing is necessary for the performance of a contract to which the individual is party or in order to take steps at the request of the individual prior to entering into a contract (Article 6 1(b) GDPR). For example: where processing of data is necessary to register learners onto a qualification, a learner has requested access to a Virtual Learning Environment (VLE).
- An individual has given explicit consent to the processing of personal data for one or more specified purposes and the processing relates to personal data which are manifestly made public by the individual (Article 9 2(a) & 2(e) GDPR) For example: where a learner requests a reasonable adjustment or special consideration which is health related and health data may be required for the approval process

Scope

This privacy notice covers all learners, staff, sub-contractors, volunteers, employers, partners and learners of the Centre. It also includes visitors, contractors and suppliers.

The data controller at WTC is Liz Barclay

This notice covers learners, stakeholders, staff, contractors or members of the public may wish to make in relation to the activities of WTC.

As an accredited centre of Crossfields/CACHE there will be a requirement to share learner information. We share this information in line with our GDPR and privacy policy.

What we process

Information that WTC collects, holds and shares includes:

- Personal identifying information, typically name, date of birth, gender
- Personal e-mail address/address/phone number where this has been shared with us for using the VLE, learner correspondence, or a learner survey regarding experience of a qualification or programme as part of quality assurance monitoring.
- Any CV's of staff in our employ.
- Occasionally we process special category data, for example, health and additional support related information (Article 9 GDPR). This data is collected by WTC. If the situation dictates WTC will share this information with Crossfields Institute/CACHE



Westwood Training and Consultancy

in support of requests for Appeals, Reasonable Adjustments, Withdrawal, Deferment, Registration or Special Considerations and processed by Crossfields Institute Quality Team

Why we collect and use this information

As a Training Centre, we use personal data to:

- Register learners on programmes and qualifications
- Register learners with the Learning Records Service (LRS) to generate a Unique Learner Number (ULN)
- Verify learner assessment evidence as part of the quality assurance process
- Request the Issue certificates for qualifications
- Claim certificates from other Awarding Organisations (e.g. Crossfields Institute; NCFE/CACHE)
- Issue certificates for CPD programmes
- Approve requests for Reasonable Adjustments and Special Considerations
- Assess the quality of our services using learner surveys
- Respond to enquiries
- Send mailings and updates
- Enable access to, and use of, Crossfield's Institute if the situation deems access is required.

What we share and with who

As an accredited training centre, WTC is required to share data with Crossfields Institute and NCFE/CACHE. They in turn share information to Ofqual is the Office of Qualifications and Examinations Regulation for England. Ofqual regulates qualifications, examinations and assessments in England including Crossfields Institute regulated qualifications.

Crossfields Institute collects learner data to be processed by NCFE/CACHE for the purposes of registration and certification. NCFE/CACHE state that they will not knowingly or intentionally request information from Crossfields Institute that would not be GDPR compliant or would cause Crossfields Institute to be noncompliant.

Individual rights

Under GDPR legislation, you have the right to request access to information about you that we hold. You also have the right to:

- Object to processing of personal data which is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being made by automated means



Westwood Training and Consultancy

Please see Appendix 1 for Retention periods of data

What this means for you when you register for a WTC course

WTC is an accredited centre for Crossfield Institute to deliver a programme or a qualification. As with all Crossfields Institute approved centres WTC are required to have data protection policies and procedures that are GDPR compliant. These are reviewed annually by Crossfields Institute. If you register as a learner at WTC we are primarily responsible for the protection and use of your data. Crossfields Institutes Privacy Notice can be found on the [Resources](#) section of their website <https://crossfieldsinstitute.com>.

If you are not satisfied with the response you get from WTC or have reached the end of a process with us, please contact Crossfield's Institute directly. You can contact the Quality Team at: quality@crossfieldsinstitute.com.

Review

The policy will be reviewed in September 2022

We will review this policy and its associated procedures annually as part of our self-evaluation arrangements and/or in response to customer, or regulatory feedback and any trends that may emerge in the types of queries we may have received.

Appendix 1

Retention of personal data by WTC

WTC is required to retain personal data for a variety of purposes. We will not retain data for any longer than is required by a legitimate purpose. The table below sets out the data that we retain, for how long and why:

Learner Records	Location	Retention details
Records of any reportable death, injury, disease or dangerous occurrence	Locked cupboard in office	Three years after the date the record was made
Individual learner details (names, date of birth, gender, unique learner number)	Main student spreadsheet. Password protected.	Indefinitely, unless requested to remove



Westwood Training and Consultancy

Learner application forms	Scanned and stored in students files on WTC secure site.	Duration of the course Any paper copies are shredded once the e-copy is secure.
Assessment evidence (including RPL records)	In locked WTC cupboard in office	Until learner has qualified and EQA has had an opportunity to review evidence
Individual learner and staff logins for the virtual learning environment (VLE) – this requires first and last name and email address	On main student spreadsheet in password protected folder	For the duration of the course and indefinitely thereafter unless removed requested by learner or the course is
Assessment & monitoring records - EQA Reports, IQA Reports, Assessment feedback, Attendance/Note	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	3 years
Mailing list membership (first and last names and email address)		Indefinite, receiver can request to opt-out at any time
Portfolio of work	Assessment cupboard	To be sent home with the learner if physical. E-portfolios will be retained for
Safeguarding		
If an allegation is made against a member of staff. Maintain a clear and comprehensive summary of: <ul style="list-style-type: none"> • Allegations made • Details of how these were followed up and resolved • Any action taken • Decisions reached Keep in confidential personnel file and provide a copy to the individual concerned	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	At least until the person reaches retirement age, or for 10 years, whichever is longer
Any documents relating to a learners and staff welfare, health and safety e.g Accident books	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Three years after records were made.
Staff Records		



Westwood Training and Consultancy

Personal files and training records (including disciplinary records appraisal, supervision and working time records)	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	7 years after employment or course ceases Disciplinary Records <ul style="list-style-type: none"> • oral warning Date of warning + 6 months • written warning – level one Date of warning + 6 months • written warning – level two Date of warning + 12 months • final warning Date of warning + 18 months
Staff training records	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Current year + 3 years for general Last action + 7 years for confirmation of completion and awards
Application forms and interview notes(for unsuccessful candidates)	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Six months to one year – (recommended 12 months) – in case they make a claim they have been discriminated against during the recruitment process
Redundancy details, calculations of payments, refunds, notification to the Secretary of State	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Six years from the date of redundancy
Former staff HR paperwork	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Three years
Timesheets, sick pay, maternity pay	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Current year + 6 years
Former staff payroll records/information	In folders either physical in locked cupboard on in password protected folder on WTC cloud.	Seven years



Westwood Training and Consultancy

Records of any reportable death, injury, disease or dangerous occurrence	In folders either physical in locked cupboard or in password protected folder on WTC cloud.	Three years after the date the record was made
Accident and incident records of staff and learners	In folders either physical in locked cupboard or in password protected folder on WTC cloud.	Three years after the date the record was made (there are separate rules for the recording of accidents involving hazardous substances)
Accident/medical records as specified by the Control of Substances hazardous to Health Regulations (COSHH)	In health and safety cupboard in office	40 years from the date of the last entry
Assessments under health & safety Regulations and records of consultations with safety representatives and committees	In health and safety cupboard in office	Permanently
Accounting Records	In health and safety cupboard in office	Three years from the date on which they are made for private companies, six years for public limited companies and charities
Administration Records		
Complaints Record Book	In main office	Date of resolution of complaint + 6 years
Insurance Certificates	On notice board and then in storage	40 years from the date insurance commences or is renewed
Minutes/minute books	On WTC cloud	Permanently
Policy Documents		Expiry of policy
Visitors Book	In reception then in storage	Current year + 2 years
Newsletter, information mail outs, circulars, questionnaires	N/A	Current year + 1 year
Accounts	N/A	Current year + 6 years
Premises Files	In storage	Cessation of use of the building + 7 years then review
Risk assessments	In health and safety cupboard in office	Current year + 3 years
Insurance policies	In health and safety cupboard in office	Minimum of 6 years



Westwood Training and Consultancy

Legal Framework

General Data Protection Regulation 2018 <https://ico.org.uk/>

Data Protection Act 1998

Computer Misuse Act 1990

Freedom of Information Act 2000

Human Rights Act 1999

The Children Act 2004, 2006 (Every Child Matters)