

# PRIVACY POLICY

## 1. Introduction

Innovate Awarding is committed to protecting your privacy and security. This policy explains how and why we use your personal data, to ensure you remain informed and in control of your information.

Innovate Awarding will ask its customers or potential customers be they training providers, Employers, apprentices, learners or consultants to “opt-in” to receive information about our products and courses. This means you’ll have the choice as to whether you want to receive these messages.

You can choose not to receive information or change how we contact you at any time. If you would like to, please contact the Client Relationship Team by:

Emailing: [contactus@innovateawarding.org](mailto:contactus@innovateawarding.org)

Writing to: Block F, 291 Paintworks, Arnos Vale, Bristol, BS4 3AW

Telephoning: 0117 314 2800 (Lines open 9am – 5pm Monday - Friday).

We will **never** sell your personal data and will only ever share it with organisations we work with such as the Education and Skills Funding Agency, Institute for Apprenticeships and Technical Education, External Quality Assurance Organisations and our regulators where necessary for the performance of a contract or to comply with our legal obligations and where the personal data’s privacy and security are guaranteed.

### Questions?

Any questions you have about this policy or how we use your personal data should be sent to:

- [dataprotectionofficer@Innovateawawarding.org](mailto:dataprotectionofficer@Innovateawawarding.org)

or addressed to:

- The Data Protection Officer at the postal address given above.

## 2. About us

Your personal data (i.e. any information which identifies you, or which can be identified as relating to you) will be collected and used by Innovate Awarding, a private limited company with registration number 7212507 and data controller number ZA027909.

Innovate Awarding is based at Block F, 291 Paintworks, Arnos Vale, Bs4 3AW. For the purposes of data protection law, Innovate Awarding will be the controller.

### 3. What information do we collect?

#### Personal data you give to us

We collect data you give to us. This includes information you give when undertaking a qualification or apprenticeship with one of our partner training/employer providers, or when you work for us as a consultant, or communicating with us. For example:

- personal details (name, date of birth, email, address, telephone etc.) when you undertake a qualification or apprenticeship or work with us
- data classified as Sensitive Personal Data (ethnicity, additional learning needs)
- financial information (payment information such as credit/debit card or direct debit details or bank account details).

#### Information created by your involvement with Innovate Awarding

Your activities and involvement with Innovate Awarding will result in personal data being created. This could include details of training and qualifications undertaken.

#### Information from other organisations

We sometimes receive personal data about individuals from other organisations. For example, if we are partnering with another organisation (e.g. training providers and employers).

We may also use other organisations to help us conduct research and analysis on personal data (and this can result in new personal data being created).

#### Sensitive personal data

We may collect, or store data classified as Sensitive Personal Data (such as information relating to additional learning needs or ethnicity).

We will do this where we have been asked to do so by official Government agencies or where the information is needed for the assessment of additional educational support needs.

If we do this, we'll take extra care to ensure your personal data is protected.

#### Accidents or incidents

If an accident or incident occurs in one of our assessment environments or office and/or involving one of our employees, then we'll keep a record of this (which may include personal data and sensitive personal data).

### 4. How do we use personal information?

We only ever use your personal data with your consent, or where it is necessary to: enter into, or perform, a contract with you:

- to comply with a legal duty
- to protect your vital interests; this means, for example, keeping you safe from harm
- or for our own (or a third party's) lawful interests, provided your rights don't override these

We will only use your information for the purpose or purposes it was collected for.

#### Administration

We use personal data for administrative purposes. This includes:

- Receiving payment (e.g. direct debits or payment card details)

- Maintaining databases of our learners and their educational progress
- Performing our obligations under apprenticeship or training contracts
- Helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).

## Marketing

We use personal data to communicate with people and to promote Innovate Awarding. This includes keeping you up to date with our news and offerings.

## Internal research and analysis

We may carry out research and analysis on the data we hold, to determine the success of qualifications and end-point assessments, to understand behaviour and responses and identify patterns and trends.

We evaluate, categorise and profile personal data to tailor services and communications we send out (including targeted advertising) and to prevent unwanted material from being sent to you.

We profile customers in terms of their integration with our website and registration portals (EPA Pro and Quartz Web). For example, we keep track of the resources that are downloaded. This information helps us to ensure communications are relevant and timely.

We collect information on preferences and so that we know what material you are most likely to be interested in.

We will also obtain information about you from other sources, such as your training provider or employer.

## Anonymised data

We may combine sets of personal data and change the personal data so that it can no longer be linked to any particular person. This information may then be used to monitor Innovate Awarding's business performance or to identify trends or patterns within our existing learner database.

## 5. Disclosing and sharing data

We will **never** sell your personal data. If you have opted-in to marketing, we may contact you with information about the services we provide.

We may share personal data with subcontractors or suppliers who provide us with services. For example, we may use an IT supplier to process personal data. However, these activities will be carried out under a contract which imposes strict requirements on our supplier to keep your information confidential and secure.

For example:

Company	Product	Purpose	Data held
BTL	Surpass	On-screen testing	EEA
Skilltech Solutions	EPA Pro	EPA management platform	UK
Positive Internet	Positive Internet	Servers for EPA Pro	UK

MessageBird	MessageBird	Text message reminders	UK
Atlassian	Jira Software	EPA Pro support tickets	EEA
ProctorU*	Live+	Proctoring	US

\*ProctorU is a company that provides a proctoring service of remote invigilation enabling learners/apprentices to take on demand tests either at home or in their workplace with a 'Proctor' (invigilator) who is online with them for the duration of the test. ProctorU are based in the US and have proctors based in Mexico, Philippines, Jamaica and India.

## 6. Marketing

Innovate Awarding will ask its supporters to "opt-in" for marketing communications. This means you'll have the choice as to whether you want to receive these messages and be able to select how you want to receive them (post or email).

### E-Newsletters

We publish e-newsletters on a regular basis.

## 7. Young people

As an awarding organisation, we regularly process the personal data relating to young people who undertake one of our qualifications or end-point assessment opportunities.

### Information for Parents

If your child is under 18 then we will seek permission to record any audio-visual communications.

We take great care to protect and respect the rights of individuals in relation to their personal data, especially in the case of children.

## 8. How do we protect personal data?

We use a variety of physical and technical measures to keep your data safe and to prevent unauthorised access or sharing of your personal information.

Electronic data and databases are stored on secure computer systems, and we control who has access to information using both physical and electronic means. Our employees receive data protection training, and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

### Payment security

All electronic forms that request financial data will use secure web technology to encrypt the data between your browser and our servers.

If you use a credit card to pay for services we provide, we will pass your credit card details securely to our payment provider. Innovate Awarding complies with the payment card industry data security standard (PCI-DSS) published by the PCI Security Standards Council and will never store card details.

## **CCTV**

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and Innovate Awarding. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review CCTV will be recorded over.

Innovate Awarding complies with the Information Commissioner's Office CCTV Code of Practice and we put up notices, so you know when CCTV is in use.

## **9. Storage of personal data**

### **Where Innovate Awarding information is stored**

Innovate Awarding's operations are based in the UK and we store our data within the EEA.

In limited circumstances such as the need to share data with subcontractors, some personal information may be processed outside of EEA

### **How long does Innovate Awarding store information for?**

We will only use and store information for so long as it is required for the purposes it was collected for. How long we keep information for depends on the information and what it's used for. For example, if you ask us not to send you marketing emails, we will stop storing your emails for marketing purposes (though we'll keep a record of your preference not to be emailed).

We continually review what information we hold and delete what is no longer required. We never store payment card information.

## **10. How do we ensure that you remain in control of your data**

We want to ensure you remain in control of your personal data. Part of this is making sure you understand your legal rights, which are as follows:

- the right to ask and be told whether or not we have your personal data and, if we do, to obtain a copy of the personal data we hold (this is known as a subject access request)
- the right to have your data deleted (though this will not apply where it is necessary for us to continue to use the data to administer your training course or apprenticeship.
- the right to have incorrect data amended
- the right to object to your data being used for marketing purposes or profiling

Please note that there are exceptions to the rights above and, though we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

If you would like further information on your rights, please write to or email our Data Protection Officer at the addresses given in section 1.

We can provide you with a subject access form template which includes guidance on how to make your request and will help us respond more quickly. Please contact us for a copy of this.

## Complaints

You can complain to Innovate Awarding directly by contacting our data protection officer using the details set out above. If you wish to make a complaint which does not directly relate to your data protection and privacy rights, you can do so in accordance with Innovate Awarding's complaints policy.

If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk)

## 11. Cookies and links to other sites

A cookie is a small file which asks for permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Our website contains hyperlinks to many other websites. We are not responsible for the content or functionality of any of those external websites (but please let us know if a link is not working by using the 'Contact us' link at the top of the page).

If an external website requests personal information from you, the information you provide will not be covered by Innovate Awarding's privacy policy. We suggest you read the privacy policy of any website before providing any personal information.

When purchasing goods or services from any of the businesses that our site links to, you will be entering into a contract with them (agreeing to their terms and conditions) and not with Innovate Awarding.

## 12. Changes to this privacy policy

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

This Privacy Policy was last updated in February 2022.