

Privacy Notice – Juniper Training

Juniper Training Ltd, 5 Element Court, Wolverhampton WV10 7QZ, is an education and training provider, delivering contracts on behalf of the Education and Skills Funding Agency, which is an executive agency of the government of the United Kingdom, sponsored by the Department for Education.

Juniper is registered with the Information Commissioner's Office (ICO) as a Data Controller under the UK Data Protection Act of 1998.

Juniper is committed to your privacy. This Privacy Notice will help you to understand what information we collect and process; how we use, share and protect it; and what choices you have about your personal data.

We shall process your personal data in accordance with the General Data Protection Regulations (GDPR).

This Privacy Policy will be updated from time to time. You may wish to revisit it each time you are requested to provide us with information.

What Student Information Do We Collect hold and Share?

We may collect some or all of the following information (this may vary according to your relationship with us)

- Personal Information (such as Address, Phone No, Email, Date of Birth National Insurance Number, Previous Education & Employment History, Parent/Guardian details)
- Characteristics (such as Ethnicity, Disability/Medical Conditions, Gender, Sexual orientation, Language, Nationality, Country of Birth and Free School Meal Eligibility)
- On Programme Information (such as Current Status, Attendance, Tracking Progress, Assessment Verification & Certification, Off the Job Training, workplace, Complaints, Disciplinary Cases & Appeals)
- Family or Personal Circumstances (such as that necessary to support your Programme Eligibility, Bursary Application & Payment)
- Other information (such as Safeguarding Reports, Risk Assessments, Website Cookies)

Your personal data may contain "Special Categories of Data" as described under the GDPR. This will include information about your Gender, Racial or Ethnic origin, Religious/Other beliefs, Physical/Mental health. When you register with us as a student, you can decide if you wish to share with Juniper certain types of "Special Categories of Data". The Application & Enrolment process will provide further information on this.

Children's Personal Data

We do not provide services to children under the age of 16, although we may be contacted by interested parties aged 15, that are looking to start a course when aged 16. If you learn that a child under the age of 13 has provided us with their information without having parental consent, please contact datarequest@junipertraining.co.uk

Why We Collect & Use This Information

- Interact with you before you are enrolled (e.g. to send you information or answer enquiries about our courses) and deal with any concerns or feedback you may have
- Support your learning & to monitor and report on your progress
- Provide appropriate pastoral care including support services, additional learning support
- Assess the quality of our services and deal with complaints, grievances and disciplinary actions
- Comply with the law regarding data sharing
- Monitor our equality and diversity objectives
- Safeguarding and learner and staff welfare
- Safety and security, including that of the learning and working environment
- Production of statistical information for use of services, including enrolments, progression, achievement and destination
- Comply with immigration checks in relation to right to work and access public funding;
- For any other agreed purpose for which you provide us with your personal data

We must always have a lawful basis for using personal data. We will use your personal information to provide you with a personalised programme of study that best suits your needs. We use your personal information to fulfil the agreement we have with you and our contract with the Education and Skills Funding Agency, complying with our legal obligations and protecting your vital interests.

If you choose not to share your personal data with us, or refuse certain contact permissions, we will not be able to provide the services you have asked for.

With your permission and/or where permitted by law, we may also use your personal data for our marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam and you will always have the opportunity to opt-out.

The Lawful Basis On Which We Use This Information

We collect and use your information under the following reasons

Consent: In some situations, we can collect and process your data with your consent, e.g. when you complete the online Enrol now contact form where we may contact you about starting a programme with us or when you consent to us using your information for Juniper's (not others) marketing purposes.

Contract: The processing of your information is necessary by us to fulfil our obligations to you, and to provide a service to you in line with you being on a programme with us.

Legal Compliance: Individuals accessing apprenticeships and other government-funded services are legal bound to provide personal data as part of the service access, under the apprenticeships, skills, children & learning act 2009, and to create and maintain a unique learner number (ULN)

We may be required to collect and disclose your personal data to the Police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. Certain criminal convictions may have to be disclosed (for students on adult social care and childcare related courses and/or work experience.)

These requests are assessed on a case-by-case basis and take your privacy into consideration.

Vital Interest: It may be necessary to use your information to protect your life, e.g. Disclosures of health/medical related issues or report safeguarding issues that may potentially endanger life.

Legitimate interests: We require your information to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and offering our services e.g. to provide you with an individualised programme of study. In most circumstances, it is necessary for us to process your information to comply with our contractual obligations with the Education and Skills Funding Agency. This does not materially impact your rights, freedom or interests. We may process your information to:

- Monitor, maintain and improve the standard of service delivery and evaluate the performance and effectiveness of Juniper
- Promote equality and diversity
- Seek advice on our rights and obligations, such as where we require our own legal advice
- Recover money owed to us

Personal Data Rights

Under Data Protection legislation, students and their parents have the right to request access to information about them that we hold. To make a request for your personal information (or be given access to your child's educational record) please contact datarequest@junipertraining.co.uk or write to us at:

Data Request, Juniper Training Ltd, 5 Element Court, Hilton Cross Business Park, Wolverhampton, WV10 7QZ

Juniper reserves the right to ask for proof of identification and for further clarification of the request if it is unclear in the first instance. You will receive a reply in no longer, than 30 calendar days from the date you make the request in writing.

You Also Have The Right To:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means (We do not presently use automated systems for Carrying out certain kinds of decision-making or profiling)
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the Data Protection regulations

Data portability

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

You also have the right to withdraw consent from the processing of your personal data by Juniper at any time, **if your consent was sought initially to use your personal data**. Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

If you have given your consent and you wish to withdraw it, please contact us using the contact details above. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

Why we share information

Juniper is required to share personal data with certain other organisations in order to meet statutory requirements or to provide services to its students.

Sharing will be undertaken in line with the requirements of data protection law, either through the consent of the individual, or another relevant legal channel. The personal data that is shared will be limited precisely to what the other organisation needs to meet its requirements or deliver its services.

Juniper takes your privacy very seriously and will only share your information with third parties where there is a legitimate business interest. We do not share information with anyone without consent unless the law and our policies allow us to do so.

You have the opportunity to opt out of some of these data sharing arrangements when you register with us, but you should carefully consider the possible impact of doing this.

Who We Share Information With

We routinely share student information with:

- National Government Departments and other public bodies (such as The Education and Skills Funding Agency (ESFA), Ofsted)
- Local authorities and/or providers of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

The information you supply is used by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE), to issue you with a Unique Learner Number (ULN) and to create your Personal Learning Record, as part of the functions of the DfE.

For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <https://www.gov.uk/government/publications/lrs-privacy-notice>

Third parties who work with us to provide support services where there is a legitimate or legal reason for their receiving the information.

- SMS services to improve attendance
- Specialist support organisations
- Professional and regulatory bodies
- IT support companies, to help us provide the best service to you.
- Awarding bodies for validation of registrations and awards
- External examiners for examination, assessment and moderation purposes
- Current or potential employers, including providing references
- Insurers and legal advisers for the purpose of providing insurance cover or in the event of a claim

Additionally parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure)

To ensure these organisations keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.
- We won't share your information with any other organisations for marketing, market research or commercial purposes.

How Do We Protect Your Personal Information

We have implemented a number of security measures and features to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration of your information.

Transmitting information over the internet is generally not completely secure, and we can't guarantee the security of your data if you transmit it in this way. Any data you transmit in this manner is at your own risk. By submitting any personal data in this way, you agree to this.

How long do we store the data for?

Juniper will only retain your personal information for as long as is necessary for the purpose for which it was collected, or for other essential purposes, such as complying with our contract with you, legal obligations, resolving disputes, and enforcing our policies. At the end of the specific retention period, your data will either be deleted completely or anonymised so that it can be used in a non-identifiable way for statistical analysis and business planning.

Pre enrolment Applicant data will be retained for 6 months, enrolled student data will be kept for a minimum of **6 years** after which time it will be destroyed.