

## Privacy Notice - Learners

### 1. Introduction

This notice applies to people receiving services from Novus Cambria.

There is a summary version of this policy available on request from Novus Cambria staff, or at: <https://www.novuscambria.ac.uk/data-protection>.

This notice is also available in Welsh.

### 2. What is the purpose of this document?

Novus Cambria is part of LTE Group. We are committed to protecting the privacy and security of personal information. This notice describes how we collect and use personal information in accordance with current data protection laws.

If you have any questions regarding this document or your personal data, you or your representative can contact our Data Protection Office, or you can ask any Novus Cambria staff to do this on your behalf:

- LTE Group, Whitworth House, Ashton Old Road, Manchester M11 2WH
- You or your representative can also contact us via: [dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

### 3. The kind of information we hold about you

Personal data, or personal information, means any information which can be used to identify an individual or individuals. It does not include data where the identity has been removed (anonymous data). There are also special categories for more sensitive personal data which require a higher level of protection.

The categories of personal information that we may collect, store, and use about you may include:

	Learners	Parent / guardian
Age	✓	
Classroom monitoring software data	✓	
Complaint information	✓	✓
Employment/education information/history (where relevant)	✓	
Ethnicity/nationality*	✓	
Gender	✓	
Health, including any medical conditions, injuries or learning difficulty and disability status*	✓	
Personal information and contact details	✓	✓
Photograph to be used for gaining qualifications, e.g. CSCS card (where relevant)	✓	
Photography and videography of you/your work	✓	
Prison management information and prison number	✓	

#### 4. How is your personal information collected?

We typically collect personal information through the information you provide to us during the induction or initiation process for the service you are receiving. We may collect additional information during your time with Novus Cambria.

#### 5. How will we use information about you?

Overall, we use your personal data to provide you with Novus Cambria services. We have set out the main purposes for processing below.

Purpose	Lawful Basis
To let you access Novus Cambria services	<ul style="list-style-type: none"><li>Performing a task (education) in the public interest</li><li>We have a legal or contractual obligation</li><li>We have a legitimate interest</li><li>To protect your vital interests (e.g. in an emergency)</li><li>We have your consent</li></ul>
To comply with health and safety rules	
To monitor equal opportunities	
To undertake audits	
To process any complaints you may make	
To protect you in an emergency	
To research and plan within Novus Cambria and LTE Group	

#### Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another lawful basis). If we do process your personal information based on your consent, we will inform you of this before we start the processing. You have the right to withdraw your consent at any time.

#### 6. If information is not provided

If you do not provide personal information, we may not be able to provide you with access to our services, or we may be prevented from complying with our legal or contractual obligations.

#### 7. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not intend to take any decisions about you in this way. We will notify you in writing if this changes.

#### 8. Data sharing

We may share your personal information with third parties, such as the custodial operator, awarding organisations, employers, parents/guardians of under 18s, and/or other learning/education providers. A full register of who we share your personal data with and why is available on request from the DPO. We may also have to disclose your personal information by law, or to comply with the law, if an Authority asks us.

All third parties are required to take appropriate security measures to protect your personal information. We only allow them to process your personal information for specific purposes. They must only do this in accordance with our instructions.

#### 9. Data security

We have measures in place to help protect your information, and we limit access to this information in order that only authorised parties who have a legitimate need to know can access it.

Your data will be stored in the UK only.

We have procedures to deal with any suspected security breach. We will notify you of a suspected breach where we are legally required to do so.

### 10. How long will you use my information?

We will only retain your personal information for as long as needed. We have a **Data Retention Schedule** which outlines how long we keep information. This is available on request by contacting our DPO, using the details in [Section 2](#).

### 11. Your individual rights in connection with personal data

Under certain circumstances, by law, you have the right to request:

- **Access** to your personal information
- **Correction** of the personal information we hold about you if it is inaccurate
- **Erasure** of your personal information. We can only do this in certain circumstances
- **Restriction** of processing of your personal information
- **Transfer** of your personal information to another party
- **Objection** to processing of your personal information
- **Suspension of** processing of your personal information

If you wish to make any requests regarding your personal data, please speak with any member of the Novus Cambria team, or contact the DPO, using the details in [section 2](#). If you make a request, we may need specific information from you, or your representative, to confirm your identity.

### 12. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

**The Company Secretary & General Counsel**

LTE Group  
Whitworth House  
Ashton Old Road  
Manchester  
M11 2WH

[dpo@ltegroup.co.uk](mailto:dpo@ltegroup.co.uk)

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

**Information Commissioner's Office - Wales**

2nd Floor,  
Churchill House  
Churchill Way  
Cardiff CF10 2HH

0330 414 6421

<https://ico.org.uk/about-the-ico/who-we-are/wales-office/>

Your representative can also contact the ICO via: [wales@ico.org.uk](mailto:wales@ico.org.uk)