

PRIVACY POLICY & NOTICE

(POL057)

2025/2026



**BE THE EXPERT
BE THE CUSTOMER
BE THE FUTURE**



DOCUMENT REVISION CONTROL

REVISION HISTORY

Date	Author	Version	Change Reference
01/09/2024	Debbie Park	V9	Annual renewal
31/07/2025	Debbie Park	V10	Annual renewal, combining Privacy policy & notice, removal of references to ESFA and replace with DfE. Removal of reference to tracking & Cookies, Cookie Policy to be created instead. Update DfE ILR Privacy notice. Inclusion of AI and personal data use.

REVIEWERS

Change Requested By	Change Actioned By	Date

DISTRIBUTION:

Date	Distributed to	Version	Distribution Format



THIS POLICY INCLUDES THE DEPARTMENT FOR EDUCATION PRIVACY NOTICE (AT ANNEX A) TO INFORM LEARNERS HOW THEY USE THEIR PERSONAL INFORMATION

Introduction

This privacy policy has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

This notice sets out the basis on which any personal data including special category personal data that we collect from you, or that you provide to us, will be processed by us. Personal data means information about you that may identify you from that data.

This policy applies to Candidates, Learners, Employers and Partners.

This policy ensures Baltic Apprenticeships meets the Data Protection Principles which require information to be:

- Handled fairly and lawfully
- Kept and used for limited purposes
- Required for good reason
- Correct and up to date
- Not kept longer than necessary
- Handled confidentially
- Stored securely
- Not transferred to unapproved countries outside the European Economic Area

Who we are

Baltic Training Services Ltd (known as Baltic Apprenticeships) is a Training Provider who contracts the Department for Education (DfE) to deliver Apprenticeship and Adult Education Training Programmes.

Data Controller Statement

Baltic Training Services Ltd, (also referred to in this policy as "we" or "us") registered office is Pioneer House, Pioneer Court, Darlington, Co Durham, DL1 4WD company number 05868493 is the Data Controller in respect of all data collected.

Your acceptance of this policy and our right to change it

By using our websites, social media pages or by providing your information, you understand that we will collect and use the information provided in the way(s) set out in this policy. If you do not agree to this policy do not use our sites, social media pages or services.



We may make changes to this policy from time to time. If we do so, will post the changes on this page and they will apply from the time we post them.

What information do we collect from you or ask you to provide?

We collect data directly from you during recruitment, induction and programme delivery, this includes;

Personal information – such as your name, date of birth, National Insurance number, gender, contact details, details of your current situation with regarding to education, training or employment, qualifications and your future career aspirations.

Special categories of personal data – such as ethnic origin, physical or mental health or condition.

We will collect information you voluntarily provide us when you contact us with queries, complaints or customer feedback.

Call Recording (See Recording Policy)

We operate call recording for training and quality purposes, any personal data disclosed during telephone/Teams meeting calls to and from our offices will be collected.

We operate training delivery call recording to support reasonable adjustments for our learners with a learning difficulty, disability and/or medical condition and for staff training, quality and compliance purposes. For clarification training includes all aspects of programme delivery including Induction, Online Classroom Training, Workshops, Support Sessions and Progress Reviews.

If you visit our website, we may automatically collect information (See Cookie Policy)

Technical information for example internet protocol (IP)

Information about your visit to our website such as the products and/or services you searched for.

Other sources of personal data

We may also use personal data from other sources, such as specialist companies that supply information, online media channels and public registers and public website domains.



Purpose of data?

We need to collect, hold and process information about you in order to:

- Confirm your identity and keep in touch with you by post, email, text or telephone
- Help you find and prepare for employment and training opportunities
- Confirm your eligibility for training programme participation
- Register you on a training programme in accordance with the compliance requirements detailed in The Department for Education (DfE) Funding & Performance Management rules and Individual Learning Record (ILR) guidance
- Understand your needs and provide you with the appropriate support
- Meet our statutory obligations including those related to equality & diversity
- Manage our employer customer account and provide you with details of our services
- Respond to queries, complaints or customer feedback

Legal basis for processing your data

Candidate Recruitment – Legitimate interest: To ensure that Baltic Apprenticeships match candidates wishing to seek apprenticeship and learning opportunities and considering their interests, skills and abilities to match them with employer apprenticeship and employment opportunities.

Learner Enrolment and on programme participation – Legitimate interest: To ensure Baltic Apprenticeships deliver a programme of training in accordance with ESFA requirements which supports individuals and meets their learning and welfare needs. For special categories of personal data, this is processed as it is necessary for employment.

Employers – Legitimate interest: To ensure Baltic Apprenticeships supports your recruitment needs and that together we deliver a successful apprenticeship programme to our learners/employees.

Employers (Direct Marketing) – Legitimate interest: To ensure Employers are invited to support the Government's Apprenticeships and Skills Policy in England. Apprenticeships are one of the initiatives the government has in place to address skills shortages, improve the skills held by workers and provide young people with an alternative career option to University.

Improving our service – Legitimate interest: To make sure that Baltic Apprenticeships continue to improve our service and provide the best and most effective service possible to our customers (candidates, learners and employers)



Who might we share your information with?

We do need to share your data with some third parties.

Candidate data will be shared with employers recruiting to fulfil an apprenticeship vacancy

Learner data will be shared with the Department for Education, Qualification Awarding Bodies, and End Point Assessment Organisations (EPAOs). These organisations will become Data Controllers on receipt of data. Portfolio platforms used by EPAOs are data processors (ACE360 and EPA Pro). Your contact details will be shared with organisations who carry out destination surveys on completion of your apprenticeship. These organisations will also be data processors.

Employer data will be shared with the Department for Education.

Data will be visible to service providers who provide the mechanisms Baltic Apprenticeships use to collect and store data:

- Databases are provided by Perspective (Sunesis), Bud and Salesforce Seven20.
- Our E-portfolio provider is SMART Assessor and Bud
- Our Functional Skills platform is PASS Functional Skills
- Company sharepoints is Microsoft
- Company email service is provided by Aspire
- Documentation signature and exchange is provided by SignNow

Next of Kin information sharing (See Next of Kin policy)

Next of kin will be contacted where the learner meets serious harm criteria

- Attending or being admitted to hospital in an emergency
- Suffering serious physical injury including self-harm
- Experiencing a mental health crisis where there are serious concerns for learner welfare

Use of Artificial Intelligence (AI) and personal data

We use artificial intelligence (AI) technologies to support and enhance our services, including improving efficiency, practices, and decision-making processes. Where AI is used, it may involve the processing of personal data to identify patterns, generate insights, or automate certain tasks. Importantly, we do **not** use public or consumer-grade AI tools for processing personal data. We only use AI systems and platforms for which we hold appropriate licences and which meet our data protection and security standards. All personal data processed by AI is handled in accordance with the UK GDPR and other relevant legislation. We apply strict safeguards including data minimisation, pseudonymisation, and human oversight to ensure fairness, transparency, and accountability. Individuals retain all rights under data protection law, including the right to access, correct, and object to automated decision-making where applicable.



How we protect your information?

Measures we have in place to protect your information include computer safeguards such as firewalls and data encryption and we enforce physical access controls to our buildings and files to keep data safe. We only authorise access to employees who need it to carry out their job responsibilities. Please note that we cannot guarantee the security of any personal data that you transfer to us by email, for example a CV you submit to us for a vacancy. CVs and Applications submitted via our website portal are secure.

How we store your information?

Baltic Apprenticeships maintains records of the geographical location of your personal data and special categories of personal data. This is either:

- Stored in the UK or
- Stored within the European Economic Area (EEA)

How long do we keep hold of your information?

Candidate/Learner and Employer funding data will be retained in accordance with our DfE and ESF contractual requirements, this is currently until 31st December 2030 for learners starting prior to 1st August 2023.

For starts from 1st August 2023 Learner and Employer funding data will be retained in according with our DfE contractual requirements, this is currently 6 years.

Operations delivery of Training/Workshops/Support Sessions (Adobe or Teams Recordings) will be retained for the duration of the learners programme of learning.

Telephone/Teams meeting call recordings to/from Sales and non-learner facing calls will be retained for 9 months.

Telephone/Teams meeting call recordings to/from learners will be retained for the duration of the learners programme of learning, up to 18 months.

Unplaced candidate data will be retained for a period of 12 months from date of last contact

Automated decision making

Please be advised that no decisions are made using automated decision mechanisms.

Your rights under General Data Protection Regulation

You have a number of rights under data protection law. We will need to ask you for proof of your identify before we can respond to a request to exercise any of the rights set out below.



We also may need to ask you for more information, for example to help us to locate the personal data that your request relates to.

Right 1 – A right to access your information

You have a right to ask us for a copy of your personal data that we hold about you. A request to exercise this right is called a “subject access request” Details of our subject access procedure can be found on our website at www.balticapprenticeships.com or you can request a copy at dataprotection@balticapprenticeships.com

Right 2 – A right to object to us processing your information

You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. This includes all of your personal data that we process for all of the purposes set out in this Privacy Policy. If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so. Otherwise we will cease processing your personal data.

You can exercise this right by emailing dataprotection@balticapprenticeships.com

Right 3 – A right to have inaccurate data corrected

You have the right to ask us to correct inaccurate data that we hold about you; on notification we will correct your personal data.

Right 4 – A right to have your data erased

You have the right to ask us to delete your personal data in certain circumstances for example if we no longer need the data for the purpose set out in this Privacy Policy. You can exercise this right by emailing dataprotection@balticapprenticeships.com

Right 5 – A right to ask us not to market to you

You can ask us not to send you direct marketing, you can exercise this right by emailing dataprotection@balticapprenticeships.com

Right 6 – A right to have processing of your data restricted

You can ask us to restrict processing of your personal data in some circumstances, for example if you think the data is inaccurate and we need to verify its accuracy.

How to contact us

If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data you can contact us at dataprotection@balticapprenticeships.com

What if you have a complaint?



You have a right to complain to the Information Commissioner's Office (ICO) which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data. You can find out how to do this by visiting www.ico.org.uk

Policy review.

This policy will be reviewed annually or when changes are required.

- PROMOTING EQUALITY AND DIVERSITY -

ANNEX A

DEPARTMENT FOR EDUCATION (DfE)

ILR Privacy Notice 2025 to 2026 version 1: April 2025

This privacy notice is issued on behalf of the Secretary of State for the Department of Education (DfE) to inform learners about the Individualised Learner Record (ILR) and how their personal information is used in the ILR. Your personal information is used by the DfE to exercise our functions under article 6(1)(e) of the UK GDPR and to meet our statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009. Our lawful basis for using your special category personal data is covered under Substantial Public Interest based in law (Article 9(2)(g)) of UK GDPR legislation. This processing is under Section 54 of the Further and Higher Education Act (1992).

The ILR collects data about learners and learning undertaken. Publicly funded colleges, training organisations, local authorities, and employers (FE providers) must collect and return the data each year under the terms of a funding agreement, contract or grant agreement. It helps ensure that public money is being spent in line with government targets. It is also used for education, training, employment, and well-being purposes, including research.

We retain your ILR learner data for 20 years for operational purposes (e.g. to fund your learning and to publish official statistics). Your personal data is then retained in our research databases until you are aged 80 years so that it can be used for long-term research purposes. For more information about the ILR and the data collected, please see the ILR specification at <https://www.gov.uk/government/collections/individualised-learner-record-ilr>



ILR data is shared with third parties where it complies with DfE data sharing procedures and where the law allows it. The DfE and the English European Social Fund (ESF) Managing Authority (or agents acting on their behalf) may contact learners to carry out research and evaluation to inform the effectiveness of training.

For more information about how your personal data is used and your individual rights, please see the DfE Personal Information Charter (<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>) and the DfE Privacy Notice (<https://www.gov.uk/government/publications/privacy-notice-for-key-stage-5-and-adult-education>)

If you would like to get in touch with us or request a copy of the personal information DfE holds about you, you can contact the DfE in the following ways:

- Using our online contact form [https://form.education.gov.uk/service/Contact the Department for Education](https://form.education.gov.uk/service/Contact%20the%20Department%20for%20Education)
- By telephoning the DfE Helpline on 0370 000 2288
- Or in writing to: Data Protection Officer, Department for Education (B2.28), 7 & 8 Wellington Place, Wellington Street, Leeds, LS1 4AW

If you are unhappy with how we have used your personal data, you can complain to the Information Commissioner's Office (ICO) at:
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. You can also call their helpline on 0303 123 1113 or visit <https://www.ico.org.uk>