



## Privacy Notice (Learners)

### INTRODUCTION

Transport Training Academy must process the personal data of our learners in order to provide you with an effective service. Under the UK General Data Protection Regulation (UK-GDPR), we are obliged to inform you how and why we process your personal data.

The following privacy notice will outline what personal data we collect about you when you sign up to one of our courses, why we have it and how it will be processed throughout the term of our service and beyond. You will also find details of your rights as individuals under the UK-GDPR.

### SCOPE

This privacy notice applies to all clients and delegates of Transport Training Academy who partake in one of our courses.

For funded courses, please see the relevant section below.

Transport Training Academy comply with the following legislation and guidance regarding the use of your personal data:

- UK General Data Protection Regulation (UK-GDPR)
- Data Protection Act (DPA)
- Guidance and codes of conduct from the Information Commissioners Office (ICO)

### DATA CONTROLLER

Transport Training Academy is the Data Controller for the information that we process about you. This means we are responsible for your data and make decisions on how it is processed.

Under the UK-GDPR, we must appoint a person responsible for data protection in our organisation to oversee compliance and act as a point of contact for yourselves and the ICO where required. We have appointed **David Coupe** as our responsible person, please direct any requests to David using the contact details above.

### FUNDED COURSES

For those partaking in funded courses, your funding provider is the 'Data Controller'. Transport Training Academy process your data on behalf of your funding provider in order to deliver your training and fulfil our obligations to them; we are the 'Data Processor'.

Privacy Notices from the relevant funding providers can be found here:

- ESFA: [Privacy Notice - Submitting Learner Data](#)
- DfE: [Privacy Notice - KS5 & Adult Education](#)
- GMCA: [Privacy Notice - GMCA AEB](#)
- DVSA: <https://www.gov.uk/government/publications/driving-standards-agency-privacy-policy/dsa-privacy-policy>

This list is not exhaustive

### The type of personal data we collect & why?

The type of personal data we collect from you will depend upon the nature of the course you are partaking in:



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- Personal identifiers: full name, address and contact details (telephone and email address) for correspondence and marketing purposes.
- Payment details: credit / debit card or bank details in order to process the payment for your course where applicable.
- Drivers: copy of driving license and date of birth in order to book your medical.
- Course information: dates of training, details of course and qualification achieved including your certification and feedback forms.

Please note that Transport Training Academy does not process your medical information, a check is performed to ensure that it is in place only.

For funded courses, we must collect the following further categories of information where necessary to submit to your funding provider:

- Unique reference numbers where applicable including NI number
- Date of birth
- Gender
- Nationality & ethnicity
- Equality, diversity & inclusion information
- Information about your career, work status and employer
- Housing status and benefit entitlement
- Date and information about your learning including courses and qualifications you are or have taken with us; your individual learning record.

As part of our course enrolment process, we ask **all** delegates to inform us if they have any allergies, access needs or medical requirements in order to provide adequate support and provisions.

### How do we get your information?

Most of the information we process will be provided directly by you upon enrolment to one of our courses when completing our data capture forms. Course performance, results and qualifications will be generated as you progress through your learning journey with us.

In instances where you are taking one of our courses as part of your employment, your employer will provide us with your information to secure your place on the course.

For funded courses, your funding provider will issue certain information about you including any unique reference numbers and funding status.

### Our lawful bases for processing your personal data.

To comply with data protection law, Transport Training Academy must have a lawful bases from Article 6 of the UK-GDPR to process your personal data. We currently rely upon the following lawful bases to process the personal data of our learners:

### Contractual Obligations

The majority of the personal information that we process about you will be to meet a **contractual obligation** with either yourself, your employer or funding provider. We must process your data to fulfil the services that we provide to said parties.



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### Legal Obligations

For courses where funding is provided by the government, we have a **legal obligation** to submit your personal data to the relevant body in order to process your funding and qualification. Please see links to the relevant privacy notices above for further information.

We also have legal obligations under health & safety law to provide a safe environment for our learners. For instance, keeping a record of who is on site to meet our obligations under Fire Regulations.

### Consent

We will ask for your **consent** to add your name and email address to our mailing list to inform you of upcoming courses and information that may be relevant to you as a learner. Should you change your preferences at any time, you can withdraw your consent using the links at the bottom of our emails or by contacting us directly.

### Vital Interests

Should a situation arise in which we must share your data with the emergency services to protect or save your life or that of another person, the lawful basis relied upon is **vital interests**. This would only occur if an accident / incident occurs.

### Special Category Data

Transport Training Academy do not routinely process special categories of learner data as part of our own business functions. Special category data is information about you that is much more sensitive in nature and therefore requires extra protection, examples include gender, ethnicity and health data.

Under the UK-GDPR, we must meet an additional lawful bases from Article 9 of the UK-GDPR to process this type of information.

If you attend our site and share details of allergies and access requirements, we will add a file note to your learner profile. Dependent upon the nature of the details shared, the lawful basis we rely upon from Article 9 of the UK-GDPR will be one of the following:

- You have provided your **explicit consent** to add your health information to your record.
- We have a **vital interest** to protect your life.

As a 'Data Processor' of the DfE and other government bodies, we must process your special category information, namely your gender, ethnicity and diversity information. The DfE rely upon '**substantial public interest**' as the lawful basis to collect and process this information. The purpose for collecting this information is to meet their equal opportunities obligations.

### Who we share your data with?

As part of our routine operations, we share your data with the following third parties:

- Our employees where required to perform their roles.
- Your employer if your course / qualification has been organised through them.
- Our accreditors and assessors to monitor compliance and provide certification of your qualification.
- Our funding partners in order to manage the funding process for your course.



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- DVLA to perform licensing checks for drivers and / or uploading DCPC hours
- Our contractors when we employ them to provide services on our behalf (deliver training)  
In situations where an accident / incident has occurred, we may need to share your personal information with the following dependent upon the circumstances:
  - Emergency services
  - Police where any criminal activity has taken place.
  - HSE for the reporting of any serious accidents / injuries
  - Insurers in the process / defence of any claims
  - Professional advisors including solicitors if we are required to seek advice.
  - Courts if a claim is made.

It is company policy to ensure that all third parties that process personal data on our behalf (Data Processors) are reviewed and a data sharing agreement in place to ensure compliance with the relevant data protection legislation.

When sharing special category data with funding providers, password protected portals are provided to ensure the secure transfer of your data.

We do not routinely share your personal data outside of the United Kingdom. Should this happen, we will ensure that this is done so in accordance with the relevant data protection legislation.

### **How we store and secure your personal information**

Your personal data is stored securely on our premises in Greater Manchester. Any data in physical format is kept within a locked cabinet within a locked office with strict key access in place. Electronic data is stored securely on our system with password protection and access permissions in place.

Encrypted portals are provided to submit any data to funding partners. Documentation sent via email containing personal data is also password protected.

Your personal data is kept in line with our Records Management Policy & Retention Schedule.

### **Your data protection rights.**

Under data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.



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- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one calendar month to respond to you.

If you would like to exercise any of your rights, please contact us.

### Complaints

If you have any concerns about our use of your personal information, it would be very much appreciated if you could contact us in the first instance to allow us an opportunity to resolve your complaint.

### Our contact details:

Transport Training Academy

Academy House, 255 Gloucester Street, Atherton, Manchester, M46 0JD

T: 01942 874 686

E: [info@ttacademy.com](mailto:info@ttacademy.com)

You also have a right to complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

**For and on behalf of Transport Training Academy**

A handwritten signature in black ink, appearing to read "David Coupe".

**David Coupe**  
Company Director