

## HTAE Privacy Statement 2024/25

---

This document explains what the Hull Training and Adult Education does with the personal information you provide us.

### General

From time to time you will be asked to tell us personal information about yourself in order to become a learner or a client, to use our systems and services and so on. (See **Appendix A** for more details) At the point of collecting the information we aim to clearly explain what it is going to be used for and who we may share it with. Unless required or permitted by law, we will always ask you before we use it for any other reason. We would only use it for marketing with your prior consent.

Any **sensitive** personal information will never be supplied to anyone outside Hull Training and Adult Education without first obtaining your consent, unless required or permitted by law. We comply with the Data Protection Act 1998 and the General Data Protection Regulation (GDPR), including removing your personal information from our systems when it is no longer required and ensuring that all personal information supplied is held securely.

Whenever you provide such personal information, we will treat that information in accordance with this statement and current legislation. We also aim to meet current best practice.

Individuals whose personal information Hull Training and Adult Education holds have certain rights under the law. More information can be found on the Information Commissioner's website. This can be found at [www.ico.org.uk](http://www.ico.org.uk) or by calling 0303 1231113 (charged at local rate).

As a part of Hull City Council and its approach to handling the personal information of identifiable living persons we ensure we comply with the DATA PROTECTION & CONFIDENTIALITY POLICY. It is designed to ensure we comply with our legal obligations, notably the General Data Protection Regulation 2016 (GDPR), Data Protection Act 2018 (DPA) and the Human Rights Act 1998 (HRA).

This policy is designed to ensure that our employees, Elected Members and other parties acting on our behalf understand their obligations when handling personal information and comply with the GDPR and DPA. Where customers, staff or partners require more detailed support or guidance, they should contact the Information Governance Team. A glossary of the terms used within the GDPR/DPA and this policy can be found at Appendix C.

This Policy is maintained by the Information Governance Team, Town Clerk's Service, email [Information@hullcc.gov.uk](mailto:Information@hullcc.gov.uk)

### Enrolment

This section explains how Hull Training and Adult Education uses the personal information that you give us on the enrolment form.

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



## How Hull Training and Adult Education uses your information

The information will be used for purposes relating to education, training, employment, general advice services, well-being and research. Hull Training and Adult Education may share nonsensitive personal information about you with other organisations, for example the Local Authority (see below), for these purposes. We do not share your information for purposes that are incompatible, such as product marketing.

Sensitive personal information you provide (eg. disability or ethnicity) may be used by Hull Training and Adult Education for the purposes of equality of opportunity, support for your studies and to minimise risk. It may also be used anonymously for statistical purposes. We will ask your permission before sharing sensitive information with other organisations, unless the sharing is permitted by law and necessary.

## How government departments use your information

We pass most of the information to government agencies to meet funding arrangements. Hull Training and Adult Education is a Data Processor for the Education and Skills Funding Agency. This means that we will pass most of the personal information and some of the sensitive information you provide to the Education and Skills Funding Agency. Where necessary it is also shared with the Department for Education (DfE). This can be found at [Personal information charter - Department for Education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421222/Personal-information-charter-Department-for-Education-2018.pdf)

The information is used for the exercise of functions of these government departments and to meet statutory responsibilities, including under the Apprenticeships, Skills, Children and Learning Act 2009. It is also used to create and maintain a unique learner number (ULN) and a Personal Learning Record (PLR).

The information provided may be shared with other organisations for purposes of administration, the provision of career and other guidance and statistical and research purposes, relating to education, training, employment and well-being. This will only take place where the sharing is in compliance with the Data Protection Act 1998.

You may be contacted after you have completed your programme of learning to establish whether you have entered employment or have gone onto further training or education.

You may be contacted by the English European Social Fund (ESF) Managing Authority, or its agents, to carry out research and evaluation to inform the effectiveness of the programme.

Further information about use of and access to your personal data, and details of organisations with whom the data is regularly shared are available at: [Privacy policy \(skillsfunding.service.gov.uk\)](https://www.skillsfunding.service.gov.uk/privacy-policy)

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



## The legal basis for collecting the information

Most of the information on the form is collected because it is necessary for your enrolment as a learner or is required by law. You must provide it in order to enrol at the Hull Training and Adult Education.

The following information we are collecting based on your consent, and you may withdraw your consent without this affecting your status as a student: emergency contact details and parent/carer contact details.

## Parents, carers and guardians

Under the GDPR (General Data Protection Regulation), young people aged 16 and over can decide for themselves and give consent for the processing of their personal information. Parental consent is not required. There may be exceptions in regards of learners with severe learning difficulties, school link students and those who are otherwise unable to decide for themselves.

Hull Training and Adult Education has found that it is very beneficial to the young person's progress as a student if we are able to engage with the parents (or guardian/carer). Therefore it is very important that we have the parents' details recorded on our systems.

When a learner is in Further Education, parents/carers/guardians (or any other third party) are not automatically entitled to the student's information. We can only release information about our learners if we have their consent for this recorded on our system. Learners are asked for their consent for sharing information with parents/others on the enrolment form or when enrolling face-to-face. Learners can also inform us later on of who Hull Training and Adult Education may discuss with about their education/training matters. Learners may withdraw their consent the same way which they gave it.

In general, we can only share information if we have the person's consent, or there is a particular piece of legislation or agreement allowing us to share it without consent.

## Participation in Learning: Sharing information with Local Authorities

This section applies to:

- 16 and 17 year olds
- Vulnerable 18 year olds ('vulnerable' is defined locally by individual Local Authorities)
- 18-25 year olds with an Education Health Care Plan (EHCP)

in the local authorities (LAs) of Hull, East Riding of Yorkshire, North Lincs and North East Lincs

The Education and Skills Act 2008 (the Act) places duties on LAs to promote the effective participation in education or training of all 16 and 17 year olds resident in their area, and to make arrangements to identify young people resident in their area who are not participating. It is part of the LA's duties to secure sufficient suitable education and training provision for all 16-19 year olds, and to encourage, enable and assist young people to participate in learning.

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



Education & Skills  
Funding Agency

Under the Act, it is Hull Training and Adult Education's duty to provide relevant information about their learners to the LA of each learner's residence, when requested to do so, and notify local LAs when a young person leaves learning at Hull Training and Adult Education. All educational institutions are required to share information with LAs as part of their duty under the Act.

Section 72 of the Act provides the legal basis for sharing information between LAs and educational institutions. Link to relevant section is referenced here: [www.legislation.gov.uk/ukpga/2008/25/section/14](http://www.legislation.gov.uk/ukpga/2008/25/section/14)

When you give us your information we will use your details to inform the LA where you live about the learning that you are participating in so that they are able to report monthly to the Department of Education and deliver their duties listed above.

Please note that some of the services for young people provided by the LA to fulfil their duties are provided by commissioned external contractors and organisations and they are required to use the same security standards as the LA.

If you wish to opt out of the sharing of your basic details for this purpose, or wish to see information held by Hull Training and Adult Education about you for this purpose, please contact [learneradvice@hullcc.gov.uk](mailto:learneradvice@hullcc.gov.uk) or by writing to Hull Training and Adult Education The Avenues Adult Education Centre, Park Avenue, Hull, HU5 4DA

## Websites and Cookies

This section applies to anyone accessing Hull Training and Adult Education websites.

A cookie is a small file, typically of letters and numbers, downloaded on to your device (e.g. your PC) when you access the Hull Training and Adult Education website. Cookies allow the website to recognise your device and so distinguish between the different users that access the site.

**Session cookies** will remember your selections as you browse the site. These cookies are for the browsing session and not stored long term. No personal information is collected by these cookies. **Google Analytics** cookies help us to make the website better for you by providing us with user statistics, for example: which pages are the most visited; how a user navigates the site. No personal information is collected by these cookies. You may delete or control the use of cookies through your browser settings.

To find out more about cookies and what cookies might be stored on your device, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

During the course of your study you may be asked to use third party websites or services or access linked content (eg. Youtube) which may collect personal data about you. That site's own privacy notice will explain you how they use your data.

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



Education & Skills  
Funding Agency

## Responsibilities

Hull Training and Adult Education (Hull City Council) as a corporate body is the data controller under the Data Protection Act, and the Board of Governors is therefore ultimately responsible for implementation.

The designated data controller who is appointed to ensure compliance with the Act can be contacted via email [information@hulcc.gov.uk](mailto:information@hulcc.gov.uk) or in writing to Information Governance Team, The Guildhall, Hull, HU1 2AA.

## Further information

If you have any questions about Data Protection at Hull Training and Adult Education, please contact: [learneradvice@hulcc.gov.uk](mailto:learneradvice@hulcc.gov.uk)

Hull Training and Adult Education  
The Avenues Adult Education Centre  
Park Avenue  
Hull HU5 4DA

If you have a data protection concern that cannot or have not been resolved by Hull Training and Adult Education, you have the right to raise it with the Information Commissioner's Office. This can be found at [www.ico.org.uk](http://www.ico.org.uk) or by calling 0303 1231113 (charged at local rate).

## What are my rights?

You have the following rights subject to a number of qualifying conditions which are partly linked to our legal basis for processing your data:

### Right of access

You have the right to request a copy of the personal information we hold about you, except where releasing that information would breach another person's privacy or where an exemption to data protection laws applies.

You may request that HTAE disclose details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. Additionally we may need documentation such as a copy of your passport or driver's licence to verify identity.

### Right of rectification

You have the right to ask us to update or amend the information we hold about you if it is incorrect.

### Right of erasure

You have the right to ask us to remove your personal information from our records.

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



Education & Skills  
Funding Agency

### Right to restrict processing

You have the right to ask us to stop or limit processing of your personal data. When processing is stopped, we are permitted to store the personal data but not to further process it.

### Right to data portability

You have the right to ask us to provide you with a copy of your personal data in a machine readable format provided that the processing is based on your consent and it is carried out by automated means (i.e. not paper files).

You also have the right to ask us to transmit the data to another controller.

### Right to Object

You have a right to object to the processing of your personal data including the right to object to direct marketing. You can also withdraw your consent at any time.

### Who to contact to exercise your rights:

Please address requests and questions about your rights to the:

Data protection Officer at – Hull City Council Data Protection Officer Room 11 The Guildhall  
 HULL HU1 2AA Telephone - 01482 300 300

### 11.3 How to make a complaint to the supervisory authority:

You have the right to make a complaint to the Information Commissioner's Office (ICO):

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Tel: +44 (0)303 123 1113 (local rate)

Web: <https://ico.org.uk/make-a-complaint/>

We may update or amend this Privacy Policy from time to time, to comply with the law or to meet our changing business requirements. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access our Website you are agreeing to these updates and amendments.

Signed



Date 12 August 2024

Head of Service

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



Education & Skills  
 Funding Agency

## Appendix A

### How Hull Training and Adult Education uses Personal Information

The General Data Protection Regulation (or GDPR for short) is a positive step towards you having more control over how your data is used.

Hull Training and Adult Education is committed to clearly explaining what data we collect, its purpose, how long we keep it for and who we would share it with. The table below identifies this.

Data we collect	Why we collect it	Who we share it with	How long we keep it for
Sensitive Data such as Name, Address, Date of Birth, Contact details, Ethnicity, National Insurance Number, Gender, Learning Difficulty, Disability	We collect this data on behalf of our Funding Bodies. For more details about how they use your data please visit their website <a href="http://www.gov.uk">Accessing your personal learning record - GOV.UK (www.gov.uk)</a>	The Education and Skills Funding Agency and the Department for Education	Until 2030 for ESF match funding, 10 years thereafter for accredited learning 7 years from completion for non-accredited learning
As above	Register learners for qualifications	Awarding bodies - various	As above
As above	Report safeguarding concerns to the Safeguarding Board	Safeguarding Board	Up to the learner's 25th birthday
As above	IT Account creation	Google sites Microsoft Educational Teams	+ 1 year post qualification achievement /end of course
As above	IT Account creation	E Portfolio	+ 6 years post qualification
As above	Follow up post course to see what impact the training has had	External company for learner destination	Report will be retained as per the funding data. The company will retain the data for the duration of the contact

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by

As above + parental contact and Doctor contact		Crèche registration	+ 2 year from last visit
As above		ALN/EHCP	As per funding data

If you have any questions about Data Protection and Hull Training and Adult Education, please contact:

[learneradvice@hullcc.gov.uk](mailto:learneradvice@hullcc.gov.uk)

Hull Training and Adult Education  
 The Avenues  
 Park Avenue  
 Hull HU5 4DA

HTAE Policy File Name	Author	Doc No	Version No	Checked	Date	Review Date
Privacy Statement /GDPR 23_24	SG	7P	1	LMC	Aug 24	Aug 25

Funded by



Education & Skills  
 Funding Agency