Haddon DfE Privacy Policy

Document version control Document title:	**Haddon Privacy Policy 2026**
Document status:	**Final**
Version number:	**2**
Date:	**22/4/26**
Author:	**AD**
Approved by:	**Board**
Review date:	**August 2027**

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1. Introduction

Haddon Training ("we", "us", "our") is an independent training provider delivering education and training, including **apprenticeships funded by the Department for Education (DfE)**.

We are committed to protecting the privacy and security of personal data and complying with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and other applicable data protection legislation.

This Privacy Policy explains how we collect, use, store and share personal data, including information collected and submitted as part of the **Individualised Learner Record (ILR)**.

2. Who We Are (Data Controller)

Data Controller:
Haddon Training

Address:
Haddon Training,
Brinkworth House,
Brinkworth, Chippenham,
Wiltshire, SN15 5DF

Email:
Traceyo@educ8training.co.uk

Telephone:
01443 749000

If you have any questions about this policy or how your data is used, please contact us using the details above.

3. The Personal Data We Collect

3.1 Learner and Apprentice Data

We may collect and process the following categories of personal data:

- Personal identifiers (name, date of birth, ULN, learner reference numbers)
- Contact details (address, email, phone number)
- Gender, ethnicity and nationality
- Right to work / right to study evidence
- Prior education and qualifications
- Apprenticeship details and funding eligibility
- Attendance, progress and achievement information
- Assessment outcomes and portfolios
- Additional learning needs or support requirements
- Employment details (employer name, job role, hours, wage)
- ILR-required data fields

3.2 Special Category Data

We may process special category data where required by law or funding rules, including:

- Health information (to support learning or reasonable adjustments)
- Ethnicity
- Learning difficulties or disabilities

This data is processed only where there is a lawful basis and appropriate safeguards.

4. Why We Use Your Data (Purposes)

We use personal data to:

- Deliver training, assessment and apprenticeship programmes
- Meet contractual and funding requirements
- Monitor learner progress, attendance and achievement
- Submit accurate ILR data to the Department for Education
- Provide learner support and safeguarding
- Comply with legal, regulatory and audit requirements
- Communicate with learners, employers and stakeholders
- Maintain quality assurance and improvement processes

5. Lawful Bases for Processing

Under UK GDPR, our lawful bases for processing include:

- **Legal obligation** – including DfE, and Ofsted requirements
- **Public task** – delivery of publicly funded education and training
- **Contract** – training agreements with learners and employers
- **Consent** – where explicitly required (e.g. marketing communications)
- **Vital interests** – safeguarding or welfare situations

6. How We Use Data in the ILR (ILR Privacy Notice)

Some of your personal data is shared with the **Department for Education (DfE)** through the **Individualised Learner Record (ILR)**.

The DfE uses this information to:

- Allocate and manage funding
- Monitor the performance of training providers
- Produce statistics and research
- Carry out audits and assurance checks
- Support education policy development

Your data may be shared by the DfE with other organisations, including:

- Office for National Statistics (ONS)
- Other government departments
- Organisations conducting audits, research or evaluations

Further information on how the DfE uses learner data can be found in the **DfE Personal Information Charter** and **ILR Privacy Notice**, available on GOV.UK.

7. Data Sharing

We may share personal data with:

- The Department for Education (DfE)
- Employers involved in apprenticeship delivery
- Awarding and end-point assessment organisations
- Ofsted
- Auditors and funding assurance bodies
- Learner management system (LMS) and IT service providers
- Safeguarding or support agencies where necessary

We only share data where there is a lawful basis and appropriate safeguards in place.

8. Data Storage and Retention

We store personal data securely using appropriate technical and organisational measures.

Data is retained in line with:

- DfE funding rules
- ILR retention requirements
- Legal and contractual obligations

Typically, learner records are retained for **at least 6 years** after the end of funding, unless a longer retention period is required by law.

9. Your Data Protection Rights

Under UK GDPR, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure in certain circumstances
- Restrict processing
- Object to processing
- Data portability (where applicable)

Some rights may be limited where processing is required by law or public task (for example, ILR data).

Requests should be made in writing using the contact details in Section 2.

10. Data Security

We take data security seriously and use measures including:

- Access controls and user permissions
- Encrypted systems and secure storage
- Staff training on data protection
- Policies and procedures for breaches

Any personal data breach will be handled in accordance with UK GDPR requirements, including notification to the ICO and affected individuals where necessary.

11. Complaints

If you are unhappy with how we handle your data, you can raise a concern with us directly. For further information, please see our complaints policy which can be found on our website: https://www.haddontraining.co.uk/policies/

You also have the right to complain to the **Information Commissioner's Office (ICO)**:
Website: https://www.ico.org.uk
Telephone: 0303 123 1113

12. Changes to This Privacy Policy

We may update this policy from time to time to reflect changes in legislation or funding requirements. The latest version will always be available on our website or on request.