

earner Privacy Notice – Effective from 12 November 2025

This one notice covers every programme delivered by The Skills Centre, including commercially funded courses.

1 Who we are

The Skills Centre London Ltd (company 06401277)

Registered office: Unit 7, Cae Gwyrdd, Tongwynlais, Cardiff CF15 7AB

2 How to contact us

Data Protection Officer - dpo@theskillscentre.co.uk | 020 4613 1700

3 Data we collect

Stage	Data items
Enquiry	Name, contact, course interest, preferred site, marketing source, call notes, Sex (optional, includes 'Prefer not to say'), Preferred pronouns (optional). We do not record gender identity at enquiry.
Pre-enrolment	Date of birth, address, funding status, work history, CSCS status.
Enrolment	Equality and diversity, disability and support needs, ILR legal sex required by DfE (Female or Male), prior achievement, ID check, national Insurance number, Borough, County, benefit evidence, emergency contact, photo, signature.
Course	Attendance, progress, photos and video used in assessments, placement feedback.
After course	Outcome, job status, follow-up survey.
Marketing (Consent only)	Photos, Video, case studies, personal stories, testimonials

We do not record gender identity at enquiry. If you share gender identity later for equality or support, we treat it as special-category data under section 4. We do not make automated decisions that produce legal or similarly significant effects. Pronouns are used for communications and not shared with funders.

4 Why we use your data (Purpose/basis table)

Purpose	Article 6 basis	Article 9 condition (if special category)
Handle your enquiry	6(1)(b) – steps before contract	-
Sex at enquiry (optional)	6(1)(f) – legitimate interests (LIA in place)	-
Pronouns for communications	6(1)(f) – legitimate interests (LIA in place)	-
Deliver training, claim funding	6(1)(b) – contract	-
Record ILR / ESFA data (incl. ILR 'Sex' at enrolment)	6(1)(e) – public task	-
Health & safety, safeguarding	6(1)(c) – legal duty	9(2)(g) – substantial public interest — DPA 2018 Sch.1 para 18 (safeguarding). 9(2)(c) – vital interests (emergencies). APD applies.
Make reasonable adjustments/learner support	6(1)(b) – contract or 6(1)(e) – public task (where delivery is commissioned)	9(2)(b) – employment/social protection and , where relevant, 9(2)(g) with the matching Schedule 1 condition(s). APD applies.
Equality monitoring (optional)	6(1)(f) – legitimate interests or 6(1)(e) – public task (if a funder mandates monitoring)	9(2)(g) — Sch.1 para 8 (equality of opportunity/treatment). APD applies.
Employment support delivery (WMCA Youth Guarantee Trailblazer)	6(1)(e) – public task	9(2)(b) – employment/social protection and , where relevant, 9(2)(g) with corresponding Sch.1 condition(s). APD applies.
Programme evaluation / statistics (separately scoped)	6(1)(e) – public task	9(2)(j) – research/statistics with Article 89(1) safeguards; outputs effectively anonymised before any external sharing.
Prevent grant fraud & quality checks (incl. CITB)	6(1)(f) – legitimate interests	-
Assessment portfolios (photos/video in evidence)	6(1)(b) – contract	-
Marketing / research (ours or CITB)	6(1)(a) – consent	-

We maintain an **Appropriate Policy Document (APD)** for special-category (and criminal-offence) data where required by **DPA 2018 Schedule 1**; it's kept under review and retained **six months after** relevant processing ends.

Where we process **criminal-offence data** for safeguarding/risk checks, we rely on **Article 10 UK GDPR** and a DPA 2018 **Schedule 1** condition (e.g., **para 10** preventing/detecting unlawful acts or **para 18** safeguarding); the **APD applies**.

5 Who receives your data

- Funding bodies: GLA, DfE
- CITB – grant, levy and achievement checks (CITB may survey you if you consent)
- Awarding bodies: NOCN, NPORS, others as needed
- Placement employers
- HM Revenue & Customs – levy checks (CITB only)
- West Midlands Combined Authority (WMCA) — programme management, eligibility/claims, outcomes and audit (Youth Guarantee Trailblazer)
- Contracted IT suppliers (CRM, MIS, e-portfolio)
- Recruitment partners and employment agencies – only where you give consent
- Public audiences if you consent to marketing publication on our website, social media or press.

We never sell your information.

6 International transfers

- Main systems sit in the UK or the **EEA (European Economic Area)**.
- UK> EEA transfers are permitted under UK adequacy regulations.
- UK> non-EEA transfers use the UK International Data Transfer Agreement or the UK Addendum to EU SCCs.
- If we target or monitor people in the EEA, the EU GDPR also applies.
- Where a restricted transfer occurs, we complete a **Transfer Risk Assessment (TRA)** and apply appropriate safeguards.

7 How long we keep your data

Record	Retention
Enquiry (no enrolment)	12 months from last contact
ESFA-funded learner file	6 years from financial year-end after last payment
CITB grant / levy evidence	3 years from end of tax year; some CITB contracts: 7 years from agreement end date. Follow the contract.
ILR dataset (DfE)	20 years operational, then retained for research until the learner turns 80
Health / disability support notes	6 years from financial year-end after last payment, then anonymise.

Safeguarding report	Safeguarding allegations about staff — keep at least until the person's normal pension age, or 10 years from the date of the allegation, whichever is longer.
Child protection records [if held]	Child protection file – retain until the child is 25, then review.
Marketing consent	Kept while consent remains valid and the learner engages; deleted or suppressed after 24 months of no activity.

After these periods we delete or anonymise the data.

8 Your rights

Access • correction • deletion • restriction • objection • portability • withdraw consent.

Where we rely on **public task (Art. 6(1)(e))**, you have the **right to object (Art. 21)**; we will assess your objection and stop processing unless we demonstrate compelling legitimate grounds.

Complain to the ICO: icocasework@ico.org.uk | 0303 123 1113.
We respond within one month.

9 Extra contact for CITB learners

Information Governance Team, CITB
Sand Martin House, Bittern Way, Peterborough PE2 8TY
information.governance@citb.co.uk | 0344 994 4400

10 Updates

Reviewed yearly. Last updated 22 September 2025.