Privacy Policy	
Version No	4.0
Operational from	September 2026
Policy prepared by	Director of Quality, Compliance & Excellence
Approved by	Educationwise Board
Annual assurance date	September 2027
Next full review	September 2028

Purpose

This Privacy Policy explains how Educationwise collects, uses, stores, shares and protects personal information.

It applies to:

- Learners and apprentices
- Prospective learners
- Employees and applicants
- Employers
- Parents, carers and authorised representatives where relevant
- Associates and contractors
- Subcontractors
- Suppliers
- Partners
- Website visitors
- Other people who interact with Educationwise

This policy should be read alongside Educationwise's Data Protection Policy and Cookies Policy.

Who we are

Educationwise provides apprenticeships, Adult Learning Provision, commercial courses and workforce development services.

For the purpose of data protection law, Educationwise will normally act as the data controller for personal information collected and used to operate its services.

Company address:
Engine Shed
Station Approach
Temple Meads
Bristol
BS1 6QH

Educationwise is registered with the Information Commissioner's Office under registration number **ZA506544**.

Data protection law

Educationwise processes personal information in accordance with applicable data protection and privacy legislation, including:

- UK General Data Protection Regulation
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations 2003

Educationwise will ensure that personal information is:

- Used fairly, lawfully and transparently
- Collected for clear and legitimate purposes
- Limited to what is necessary
- Kept accurate and up to date
- Retained only for as long as required
- Protected against loss, misuse, unauthorised access or disclosure
- Managed in a way that protects individual rights

Personal information we may collect

The information Educationwise collects will depend on the individual's relationship with us.

Learners and apprentices

We may collect:

- Name
- Address
- Email address
- Telephone number
- Date of birth
- Age
- Identification information
- Residency and eligibility information
- Previous qualifications and learning
- Employment information
- Employer and workplace information
- Enrolment and programme information
- Attendance and engagement

- Progress and review information
- Assessment and achievement records
- Individualised Learner Record information
- English and mathematics information
- Learning support information
- Disability or health information where relevant
- Reasonable adjustment information
- Safeguarding and wellbeing information
- Career aims and destination information
- Complaints, appeals and conduct information
- Communications with Educationwise
- Photographs, recordings or online activity where relevant

Prospective learners

We may collect:

- Contact details
- Programme interests
- Previous qualifications
- Employment information
- Eligibility information
- Information provided through initial enquiries or applications
- Support requirements
- Information, advice and guidance records

Employers

We may collect:

- Names and contact details
- Job titles
- Organisation details
- Apprentice information
- Workplace information

- Progress-review information
- Contracts and agreements
- Financial and payment information
- Communications and feedback
- Employer survey information

Employees and applicants

We may collect:

- Contact information
- Recruitment information
- Application and interview records
- Identity and right-to-work information
- Employment records
- Payroll and pension information
- Qualifications
- Training and CPD records
- Attendance and leave
- Performance and development records
- Health and reasonable adjustment information
- Disciplinary and grievance information
- Safeguarding and safer recruitment information
- Criminal record information where lawfully required

Website and digital information

When someone uses Educationwise's website or digital services, we may collect:

- IP address
- Device information
- Browser information
- Website usage information
- Online identifiers
- Cookie preferences

- Form submissions
- System and security logs
- Information entered into online tools or chat services

Further information about cookies and similar technologies is available within Educationwise's Cookies Policy.

Where we obtain information

Personal information may be provided directly by the individual or obtained from other appropriate sources.

These may include:

- Employers
- Parents, carers or authorised representatives
- Schools and colleges
- Previous training providers
- Department for Education
- Student Loans Company
- Other funding bodies
- Awarding Organisations
- Assessment Organisations
- End-Point Assessment Organisations
- Subcontractors and delivery partners
- Safeguarding partners
- Local authorities
- Government departments
- Recruitment agencies
- Professional advisers
- Publicly available sources where appropriate

Where information is obtained from another source, Educationwise will provide appropriate privacy information unless a legal exemption applies.

Why we use personal information

Educationwise may use personal information to:

- Respond to enquiries
- Provide information, advice and guidance
- Assess programme suitability
- Complete applications and enrolment
- Confirm eligibility
- Deliver education and training
- Develop and maintain training plans
- Monitor attendance, participation and progress
- Carry out progress reviews
- Deliver assessment and quality assurance
- Register learners with Awarding Organisations
- Arrange apprenticeship assessment
- Process achievement and certification
- Provide learning support and reasonable adjustments
- Provide safeguarding and wellbeing support
- Communicate with learners and employers
- Manage complaints and appeals
- Meet apprenticeship and other funding requirements
- Submit required learner and funding information
- Prevent and identify fraud or error
- Meet audit and assurance requirements
- Manage subcontracted provision
- Manage employment and recruitment
- Make and receive payments
- Maintain organisational security
- Improve services through feedback and quality assurance
- Meet legal, regulatory and contractual requirements
- Send marketing communications where permitted
- Protect the rights, safety and interests of individuals and Educationwise

Lawful bases for processing

Educationwise will identify an appropriate lawful basis before using personal information.

Depending on the activity, this may include:

Contract

Processing may be necessary to enter into or fulfil a contract with an individual.

Legal obligation

Processing may be required to comply with legal, funding, safeguarding, employment, financial or regulatory duties.

Legitimate interests

Educationwise may use personal information where this is necessary for legitimate organisational or business purposes and those interests do not override the rights of the individual.

Where appropriate, Educationwise will complete a Legitimate Interests Assessment.

Consent

Consent may be used where a person has a genuine choice.

This may include:

- Certain marketing activity
- Some photographs or recordings
- Optional activities

Consent can be withdrawn at any time.

Vital interests

Personal information may be used where this is necessary to protect someone's life.

Public task

Educationwise may rely on public task where it carries out a specific function in the public interest that is established by law.

Special category information

Educationwise may process more sensitive personal information where this is necessary and lawful.

This may include information about:

- Race or ethnic origin
- Religious or philosophical beliefs

- Health
- Disability
- Sexual orientation
- Trade union membership
- Biometric or genetic information where relevant

Special category information may be required for purposes including:

- Safeguarding
- Learning support
- Reasonable adjustments
- Equality monitoring
- Employment responsibilities
- Health and safety
- Legal claims
- Other substantial public interest purposes

Educationwise will apply an appropriate lawful basis and additional legal condition and will maintain suitable safeguards.

Criminal offence information

Educationwise may process criminal offence information where this is lawful and necessary.

This may include information used for:

- Safer recruitment
- Safeguarding
- Fraud prevention
- Legal claims
- Other lawful organisational purposes

Access to this information will be appropriately restricted.

Children and young people

Some Educationwise learners are under the age of 18.

Educationwise will take particular care when processing information about children and young people.

We will:

- Provide clear and age-appropriate privacy information
- Consider the person's age and understanding
- Consider the best interests of the child
- Collect only the information required
- Restrict access appropriately
- Apply suitable security and safeguarding controls
- Consider whether the young person can exercise their own data protection rights

A parent or carer will not automatically be entitled to access a young person's personal information.

Information may be shared with a parent, carer or representative where there is an appropriate lawful reason.

Parental consent is not automatically required for all processing involving someone under 18.

Sharing personal information

Educationwise may share personal information with organisations including:

- Department for Education
- Student Loans Company
- Other funding bodies
- Awarding Organisations
- Assessment Organisations
- End-Point Assessment Organisations
- Employers
- Subcontractors
- Local authorities
- Safeguarding partners
- Emergency services
- Police and law-enforcement bodies
- Regulators
- Auditors
- Professional advisers

- IT and system providers
- Payroll, finance and People and Culture providers
- Other suppliers providing services to Educationwise

Information will only be shared where:

- There is a lawful basis
- The sharing is necessary and proportionate
- The recipient has a valid need for the information
- Appropriate controls or agreements are in place
- Individuals have been informed where required

Educationwise does not sell personal information.

Employers and apprentices

Educationwise works closely with employers when delivering apprenticeships.

Information shared with an employer may include:

- Attendance
- Progress
- Training-plan information
- Review outcomes
- Agreed actions
- Achievement information
- Workplace support requirements
- Information needed to manage the apprenticeship

Sensitive personal information will not automatically be shared with an employer.

Safeguarding, health, disability or personal information will only be shared where there is an appropriate lawful reason and where sharing is necessary and proportionate.

Safeguarding information

Educationwise may need to collect and share information where there is a safeguarding concern.

Information may be shared without consent where this is necessary to:

- Protect the individual
- Protect another person

- Meet a safeguarding duty
- Prevent or detect serious harm or crime
- Cooperate with an appropriate statutory organisation

Educationwise cannot promise complete confidentiality where somebody may be at risk.

Safeguarding information will be handled in line with the Safeguarding and Prevent Policy.

Suppliers and data processors

Educationwise uses external organisations to support some of its services.

These may include providers of:

- Learning platforms
- Learner management systems
- Assessment systems
- Cloud storage
- IT support
- Communication tools
- Payroll
- Finance
- People and Culture services
- Website services
- Marketing systems

Where an organisation processes personal information on behalf of Educationwise, appropriate due diligence and contractual arrangements will be used.

Processors must only use information in line with Educationwise's instructions and applicable data protection law.

International transfers

Some systems or suppliers may process personal information outside the UK.

Where this happens, Educationwise will ensure that an appropriate legal mechanism is in place.

This may include:

- UK adequacy regulations
- International Data Transfer Agreement

- UK Addendum to approved Standard Contractual Clauses
- Binding Corporate Rules
- Another legally permitted safeguard or exception

A transfer risk assessment will be completed where required.

Storage and security

Educationwise uses proportionate technical and organisational controls to protect personal information.

These may include:

- Role-based access
- Password controls
- Multi-factor authentication
- Encryption
- Secure cloud services
- Device security
- Backups
- Audit trails
- Restricted access
- Security monitoring
- Staff training
- Supplier checks
- Incident-response arrangements

Only people who need personal information for their role should have access to it.

Further information is available in Educationwise's Security Policy and Data Protection Policy.

Retention

Educationwise will not retain personal information for longer than is necessary.

Retention periods will reflect:

- Legal requirements
- Funding requirements
- Contractual requirements
- Awarding Organisation requirements

- Safeguarding requirements
- Employment and financial obligations
- Limitation periods
- The reason the information was collected

Detailed retention periods are maintained within Educationwise's Records Retention Schedule.

Learner and funding records will be retained for the period required by the relevant funding agreement or contract.

Information will be securely deleted, destroyed, returned or anonymised when it is no longer required.

Information will not be destroyed where it is required for:

- An investigation
- Complaint
- Legal claim
- Audit
- Funding review
- Regulatory or safeguarding purpose

Keeping information accurate

Educationwise will take reasonable steps to keep personal information accurate and up to date.

Individuals should tell Educationwise if their information changes.

Requests to correct information may be sent to:

Email: info@education-wise.org

Individual rights

Depending on the circumstances, individuals may have the right to:

- Be informed about how their information is used
- Access their personal information
- Correct inaccurate or incomplete information
- Request deletion
- Request restriction of processing
- Object to processing

- Receive certain information in a portable format
- Withdraw consent
- Challenge certain significant automated decisions
- Make a data protection complaint

These rights are not absolute.

Educationwise will consider each request in accordance with data protection law and explain the outcome.

Requests may be sent to:

Email: info@education-wise.org

or directly to the Data Protection Officer.

Subject access requests

Individuals have the right to request access to their personal information.

Educationwise will:

- Carry out a reasonable and proportionate search
- Provide information required by law
- Protect the rights and information of other people
- Respond within the statutory timescale
- Explain where an exemption applies

Educationwise may ask for information needed to confirm identity or clarify the scope of a request.

The response period may be paused where the law permits Educationwise to seek clarification about the information requested.

Right to object

Individuals may have the right to object where processing is based on legitimate interests or public task.

Educationwise will consider the objection and determine whether there are compelling legitimate grounds for continuing the processing.

Individuals have an absolute right to object to the use of their personal information for direct marketing.

Marketing

Educationwise may send information about relevant services where this is lawful.

Marketing may be based on:

- Consent
- Another lawful basis permitted under applicable electronic marketing rules

Individuals can opt out of direct marketing at any time.

Marketing emails will normally provide an unsubscribe option.

Requests may also be sent to:

Email: info@education-wise.org

Educationwise will maintain appropriate suppression records so that people who have opted out are not unintentionally added back to marketing activity.

Cookies and website technology

Educationwise's website may use cookies and similar technologies.

These may support:

- Website operation
- Security
- User preferences
- Analytics
- Embedded services
- Marketing

Where consent is required, non-essential technologies will not be activated unless the visitor has made an appropriate choice.

Further information is provided within the Cookies Policy and the website cookie settings.

Artificial intelligence and automated tools

Educationwise may use artificial intelligence or automated technology to support appropriate business, learning or administrative activity.

Personal information must only be entered into approved systems where there is a lawful purpose and appropriate controls are in place.

Educationwise will consider:

- Data protection
- Security
- Accuracy
- Fairness

- Transparency
- Human oversight
- The impact on individuals
- Whether a Data Protection Impact Assessment is required

Educationwise will not rely solely on automated processing to make a significant decision about an individual unless the processing is lawful and appropriate safeguards are in place.

Where required, individuals will be provided with information about significant automated decision-making and the rights available to them.

Data breaches

A personal data breach may involve information being:

- Lost
- Accidentally deleted
- Altered
- Disclosed to the wrong person
- Accessed without authority
- Made unavailable

Suspected personal data breaches must be reported immediately to Educationwise.

Educationwise will assess:

- What information is involved
- Who may be affected
- The potential impact
- What action is required
- Whether the Information Commissioner's Office must be notified
- Whether affected individuals must be informed

Where notification to the ICO is required, Educationwise will normally make the notification within 72 hours of becoming aware of the breach.

Data protection complaints

Individuals may raise a complaint where they believe Educationwise has not handled their personal information correctly.

Complaints may be sent to:

Data Protection Officer: Nick Preston
Email: npreston@education-wise.org
Telephone: 0117 379 0450

Educationwise will:

- Provide an accessible route for complaints
- Acknowledge a data protection complaint within 30 days
- Make appropriate enquiries without undue delay
- Keep the individual informed
- Provide an outcome without undue delay
- Explain any action taken
- Explain the right to complain to the Information Commissioner's Office

Where the complaint concerns an action or decision of the Data Protection Officer, it will be considered by the Chief Executive Officer or another suitably independent person.

Information Commissioner's Office

Individuals can complain to the Information Commissioner's Office if they remain concerned about how their personal information has been handled.

Educationwise would normally welcome the opportunity to consider the concern first.

The ICO can be contacted through its official website or by telephone on:

0303 123 1113

Data Protection Officer

Educationwise's Data Protection Officer is:

Nick Preston
Email: npreston@education-wise.org
Telephone: 0117 379 0450

The Data Protection Officer provides independent advice and oversight in relation to Educationwise's data protection responsibilities.

Educationwise remains responsible for compliance with data protection law.

Related policies and records

This policy should be read alongside:

- Data Protection Policy
- Cookies Policy
- Security Policy

- Safeguarding and Prevent Policy
- Learner Appeals and Complaints Policy and Procedures
- Public Interest Disclosure Policy
- Records Retention Schedule
- Personal Data Breach Procedure
- Subject Access Request Procedure
- Data Protection Impact Assessment process
- Record of Processing Activities
- Appropriate Policy Document

Monitoring and review

Educationwise will keep its privacy arrangements under review.

This may include reviewing:

- Changes to legislation and ICO guidance
- Changes to systems and services
- Data protection complaints
- Individual rights requests
- Personal data breaches
- Data Protection Impact Assessments
- Data-processing suppliers
- Website and cookie arrangements
- Changes to Educationwise's use of personal information

An annual assurance check will be completed in September 2027.

A full review will take place by September 2028 or sooner where there is:

- A significant change in data protection law or regulatory guidance
- A significant personal data breach
- A regulatory finding
- A significant change to Educationwise's services
- A new high-risk system or technology
- Evidence that the Privacy Policy no longer accurately describes Educationwise's processing