



Privacy Policy Statement

Who do ACO collect data from and why?

ACO collects data from its potential learners, on programme learners, employers and staff, to be able to provide training services and respond to queries.

ACO will not disclose any information that you provide 'in confidence' to us, to anyone else without your permission, except in situations where disclosure is required by law, or where we have good reason to believe failing to share the information will put someone else at risk. We will not process any data relating to a child (under 13) without parental or guardian consent of the child concerned.

Who is the Data Controller?

ACO Training Limited is the Data Controller and is committed to protecting the rights of individuals in line with the Data Protection Act and the General Data Protection Regulation 2018 (GDPR). ACO complies by keeping personal data secure and confidential using measures such as passwords, locks, restricted and controlled access to information only. Data is checked for accuracy and to ensure it is up to date and is stored by the length of time determined by Welsh Government.

ACO can process information in accordance with GDPR Article 6(1) (a), (b) and (e) in particular where:

- processing is with consent of the data subject; or
- processing is necessary for compliance with a legal obligation; or
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in ACO as Data Controller.

Why do ACO need this data?

In order for ACO to provide some of its training services, we need to collect and use appropriate personal information. This may be collected on a paper or online form, by telephone, email, or by using video footage including photographic and digital images, or in person by a member of ACO's staff.

Examples of ACO using data include:

- a) To provide the training service you requested and communicate with you.
- b) To contact individuals who declare a disability to confidentially discuss support.
- c) To provide progress/attendance reports to employers (except relatives).
- d) To provide information to education institutions and employers, usually with consent.
- e) To promote ACO Training but with the consent of the learner if personally identified.
- f) For the purpose of entering learners for external qualifications, awards and competitions, usually with the consent of the learner.

- g) To supply personal and financial details for example for the payment of learning allowances or similar payments like travel.
- h) To disclose information to external parties for safeguarding and duty of care purposes, for example to medical practitioners and law enforcement agencies.
- i) To register with the appropriate Sector Skills Council in order to apply for the apprenticeship completion certificate on a learner's behalf.
- j) To enable DBS checks to be conducted on staff with the disclosure and barring service and to register staff with the EWC (Education Workforce Council).
- k) To ensure we meet our legal obligations and to prevent and detect fraud or crime.
- l) To allow statistical analysis of data so we can plan for the provision of services.

Who does ACO share this data with?

ACO may have to share or confirm personal information with other parties; if we need to do this we will make it clear to you on a form, letter or email you complete to provide your information.

We will only share information when it is fair and lawful to do so. Examples of who we might share data with include Welsh Government who provide funding for Work based learning programmes or Awarding Bodies to ensure people can receive certificates for qualifications.

Your information will not be passed on to organisations external to ACO for marketing or sales purposes or for any commercial use. ACO will not pass any of your personal information on to third parties, other than those who either process information on our behalf, or because of a legal requirement.

Emails ACO receive from you may be used to keep a record of your contact and your email address. For security reasons we will not include any confidential information about you in any email we send to you, unless you consent to this.

Can I access the data held?

You have the **right to access your personal data held by ACO**, the right to object to the processing of your personal information, the right to rectify or erase or restrict and to port personal information and the right to withdraw consent given.

You can **make requests regarding information verbally or in writing**, by contacting the Data Protection Officer on admin@aco-training.co.uk or in writing to the Data Protection Office, ACO Training Limited, 1st and 2nd Floor, 11 College Street, Swansea SA1 5AF.

ACO will provide a copy of the information free of charge, unless a request is unfounded, excessive, repetitive or for further copies of the same information (that has previously been provided) – in which case a reasonable charge would be applied.

ACO will provide information **without delay and at least within 28 days**. (If the information requested is complex or for numerous requests, this could take up to two months – if this is the case, you would be informed). ACO will need to verify the identity of the person making the request, using “reasonable means”. If the request is made electronically, the information response will be provided electronically in a commonly used electronic format. Should an individual not be satisfied with their response they can report to the Information Commissioner's Office (ICO), 2nd floor, Churchill House, Churchill Way, Cardiff CF10 2HH or email: wales@ico.org.uk