



Privacy Notice – Learners

Version 1.0



Contents

Version Control.....	2
Introduction.....	3
Who We Are.....	3
Definitions.....	3
The Data We Collect About You.....	4
How We Collect Information About You.....	4
How and Why We Use Your Data (Lawful Basis).....	5
Sharing Your Data.....	6
Data Security.....	6
Data Retention.....	7
Your Rights.....	7
Contact Us.....	7
Reviewing.....	8



Privacy Notice – Learners

Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Policy Pros	Oct 2025	Oct 2026	First Policy.



Introduction

PATHWAY'S LDN LTD ("Pathways LDN", "we", "us", or "our") is committed to protecting the privacy and security of our customers' personal data.

This Privacy Policy explains how we collect, use, store, and protect personal data relating to you, our learner (as someone who is referred to and/or accesses our services), in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

Who We Are

PATHWAY'S LDN LTD is a company registered in England and Wales with the Company Number 10239394.

Our Information Commissioner's Office Registration reference is: ZA804254.

Definitions

To ensure transparency, here are the key terms used in this policy:

- **Personal Data:** Any information relating to an identified or identifiable living person (data subject). This includes names, addresses, identification numbers, and contact details.
- **Special Category Data:** Personal data that requires higher protection due to its sensitive nature. This includes data revealing racial or ethnic origin, religious or philosophical beliefs, data concerning health, and data concerning a person's sexual orientation.
- **Processing:** Any operation performed on personal data, such as collection, recording, organising, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, or destruction.



The Data We Collect About You

We collect and process various categories of personal and sensitive data, which include:

- **Identity Data:** Your full name, date of birth, age, gender, address, nationality, and Unique Learner Number (ULN).
- **Contact Data:** Personal email address, mobile phone number, and emergency contact details.
- **Special Category Data (Sensitive):** Information related to your health (e.g., medical conditions, disability status, learning difficulties) to ensure we can provide necessary support and reasonable adjustments. This also includes ethnicity, sexual orientation, and religious belief, which are collected for monitoring equality and diversity purposes.
- **Educational Data:** Prior attainment levels, learning needs assessments, attendance records, progress reports, assessment outcomes, and qualification results.
- **Criminal Records Data:** We may process information relating to your criminal record.
- **Employment Data (Apprentices Only):** Your employer's name, employer payroll ID (where applicable), employment status, job role, and contract details to verify apprenticeship eligibility.

How We Collect Information About You

We collect personal information about you from a variety of sources to verify your eligibility, manage your learning, and ensure your welfare:

- **Directly From You:** Information provided during enrolment, induction forms, learning needs assessments, progress reviews, and welfare checks.
- **From Your Legal Guardians/Parents:** Information necessary for safeguarding and emergency contacts, particularly if you are under the age of 18.
- **From the Referrer or Local Authority:** If you are referred to our programmes by an external body (e.g., Jobcentre Plus/DWP, Youth Offending Teams, Local Authority), we receive relevant background, eligibility, and referral data.
- **From Your Employer:** Data regarding your employment status, job role, payroll ID, and co-investment status.



Privacy Notice – Learners

- **Through Your Learning Activity:** Information generated automatically via your participation, such as attendance records, LMS login history, and assignment submissions.

How and Why We Use Your Data (Lawful Basis)

We use your personal and sensitive data for specific, legitimate purposes, underpinned by a defined legal basis under UK GDPR:

Purpose of Processing	Data Used	Lawful Basis
Contractual Delivery & Funding	Identity, Contact, Educational, Employment	Contractual Necessity (To deliver your training or apprenticeship under the agreement with you and your employer).
Funding Compliance	Educational, Prior Attainment, Employment	Legal Obligation (To meet contractual and statutory reporting requirements of the DfE and ESFA).
Safeguarding and Welfare	Contact, Health, Attendance, Criminal Records	Legal Obligation (To comply with our statutory duty under <i>Keeping Children Safe in Education</i> and our duty of care).
Equality & Diversity Monitoring	Special Category Data (Ethnicity, Disability)	Substantial Public Interest (For statistical monitoring required by the DfE to ensure fair access and outcomes).
Communication	Contact Data	Legitimate Interests (To communicate about training, welfare, and policy changes).

Sharing Your Data

We will only share your personal data when you consent, where legally required, or when it is necessary to fulfil our contract with you. The main external parties we share data with are:

- **Education and Skills Funding Agency (ESFA):** For mandatory Individualised Learner Record (ILR) data returns, audit, and quality assurance.



Privacy Notice – Learners

- **Department for Education (DfE):** For regulatory oversight and statistical purposes.
- **Department for Work and Pensions (DWP):** Where your programme funding or benefits are linked, or where they are the primary referrer.
- **Learner Records Service (LRS):** To obtain your Unique Learner Number (ULN) and manage your lifelong learning record.
- **Ofsted:** For inspection and quality assurance of our provision.
- **Our Funders:** E.g., the DWP, Ministry of Justice, etc., where they are the funding body for your specific programme.
- **Your Employer (for Apprentices and Learners on Job Placements):** We share data concerning your attendance, progress, and competencies.
- **End-Point Assessment Organisations (EPAOs):** To facilitate your end-point assessment and certification.
- **Local Authorities, Social Services, and the Police:** If the Designated Safeguarding Lead (DSL) determines there is a **safeguarding concern** (e.g., due to poor attendance) that requires external intervention or if a crime has been committed that involves you.

We may also share your data with medical professionals in an emergency, and where you cannot consent to life-saving treatment.

Data Security

We have put in place appropriate security measures, including physical security for paper records and technical measures for digital data, to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way.

Please see our IT security Policy for further information.

Data Retention

We retain (keep) your personal data only for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.



Privacy Notice – Learners

ESFA funding rules typically require data to be retained for a minimum of **six years** after the completion of the programme for audit purposes. However, other funders may require us to retain your data for longer.

Likewise, other records (safeguarding and child protection records, health and safety records, etc.) may also be retained for longer than six years as required.

Your Rights

Under UK GDPR, you have the following rights:

- Right to access – obtain a copy of your data
- Right to rectification – correct inaccuracies
- Right to erasure – request deletion of your data (in certain circumstances)
- Right to restriction – limit how we process your data
- Right to object – object to processing based on legitimate interests
- Right to data portability – request a copy in a reusable format

To exercise any of these rights, please contact us using the details below.

Contact Us

If you have any questions about this policy or how your data is handled, please contact our Directors at:

Postal Address: Belmont Building, Belmont Road, Uxbridge, Greater London, England, UB8 1HE

Email: paul@pathwaysldnlimited.com or rena@pathwaysldnlimited.com

Tel: 07508114160 or 07982906672

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data has not been handled in accordance with the law:

www.ico.org.uk

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.



Privacy Notice – Learners

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.