



NiNe Training Limited Data Protection & Privacy Policy

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Purpose

NiNe Training Limited is committed to protecting the personal data of learners, staff, employers and partners in accordance with:

- UK GDPR
- Data Protection Act 2018

This policy explains how NiNe collects, uses, stores, shares and retains personal data across all funded and commercially delivered training programmes.

Scope

This policy applies to:

- All learners (through both funded and commercial training programmes)
- All staff and subcontracted staff
- Employers (where applicable)
- All data held in paper and electronic form

This includes data held within NiNe's central SharePoint system, Smart Assessor, Maytas, email systems, assessment records, IQA records and quality documentation.

Roles and Responsibilities

Role	Responsibility
Directors	Data Controllers for NiNe
Head of Operations	Data Protection Lead
Staff/Assessors	Responsible for secure handling of data
Subcontracted staff	Must follow NiNe data procedures

What Data We Collect

NiNe may collect:

- Personal identification data
- Contact details
- Assessment evidence and feedback
- IQA and quality records
- Safeguarding and support information (where required)
- Employment information (for staff)

Why We Collect Data

Data is processed to:

- Enrol learners
- Deliver training and assessment
- Carry out IQA and quality assurance
- Register candidates and claim certification from Awarding Bodies
- Meet funding body requirements (where applicable)
- Support learners
- Meet safeguarding and legal obligations

Where Data Is Stored

All learner evidence, assessment records, IQA documentation and quality records are stored securely within:

- NiNe's central SharePoint system, with access restricted to authorised staff.
- Maytas; a secure, role-restricted candidate management system, used to manage candidate data and funding records
- Smart Assessor, the e-portfolio system where candidates' work is stored.

No learner data should be stored on personal devices.

Data Sharing & Data Use Agreements (DUA)

NiNe shares data only where necessary with:

- Awarding Bodies (such as EAL, City & Guilds)
- Employers (where relevant)
- Welsh Government (for funded learners via LLWR)
- Subcontracted staff working on behalf of NiNe

NiNe operates Data Use Agreements (DUA) and Data Sharing Agreements to ensure data is:

- Used only for legitimate educational and quality purposes
- Protected during transfer and storage

Due to the nature of training delivery, NiNe Training Limited processes special category personal data relating to learner health, disability and equality information in order to provide appropriate support, reasonable adjustments and safeguarding. Under Data Use Agreement (DUA) risk definitions, this classifies the centre as a high-risk data processor based on the type of data handled.

This information is held and processed only within secure, access-restricted systems, primarily Maytas and is accessed strictly on a need-to-know basis by authorised staff in line with this policy.

Staff Responsibilities

All staff must:

- Use the aforementioned secure systems for storing learner information
- Not download learner data to personal devices
- Keep information confidential
- Report any data breach immediately to the Head of Operations
- Follow secure working practices when working remotely

Failure to follow data procedures may result in disciplinary action.

Data Retention

Record Type	Retention
Assessment and IQA Records	Minimum 3 years (or as required by Awarding Body)
Funded learner records	Maytas and as required by WG
Complaints/appeals/malpractice records	5 years
Staff records	In line with employment law

Data Breaches

Any suspected data breach must be reported immediately to the Head of Operations. NiNe will investigate and report to the ICO where required.

Individual Rights

Individuals have the right to access their data, correct inaccurate data, request deletion where appropriate, restrict processing, make a complaint to NiNe regarding a data concern and make a complaint to the ICO if NiNe is unable to resolve the issue.

<https://ico.org.uk/>

Relationship to Welsh Government Privacy Notice

For funded learners, Welsh Government acts as Data Controller for LLWR data. For full details as to how NiNe and Welsh Government use your data on funded programmes, this policy should be read in conjunction with the 'Welsh Government LLWR Privacy Notice (Funded Provision Only)', also available on SharePoint. A summary of this information is available in the appendices of this document.

Review

This policy is reviewed annually in July following regulatory updates.



Appendix A – Learner Privacy Notice

NiNe Training Limited collects and uses your personal information to support your learning programme and to meet legal, quality and Awarding Body requirements.

What information we collect

We may collect:

- Your name, contact details and date of birth
- Identification information where required
- Assessment evidence and feedback
- Records of your progress and achievement
- Support needs and reasonable adjustments (where applicable)

Why we collect this information

We use your information to:

- Enrol you onto your programme
- Deliver training and assessment
- Carry out internal quality assurance activities (IQA)
- Claim certification from Awarding Bodies (e.g. EAL, City & Guilds)
- Provide learner support
- Meet legal and safeguarding requirements
- Meet funding requirements where your programme is funded

Where your information is stored

All learner information, assessment records and feedback are stored securely within NiNe's central SharePoint system, Maytas and Smart Assessor. These platforms are only accessible to authorised staff.



Who we share your information with

We only share your information where necessary with:

- Awarding Bodies for certification
- Employers (where relevant to your programme)
- Welsh Government for funded programmes (via LLWR)
- Subcontracted staff working on behalf of NINE

This is done under strict data protection agreements.

How long we keep your information

Your assessment and quality records are kept for a minimum of 3 years (or longer where required by funding or Awarding Body rules).

Your rights

You have the right to:

- Request access to your information
- Correct inaccurate information
- Request deletion where appropriate
- Raise concerns about how your data is used

You can contact us at: info@nine-traininglimited.com

You also have the right to complain to the Information Commissioner's Office (ICO).

Funded programmes

If you are on a Welsh Government funded programme, some of your data will also be processed by Welsh Government through the Lifelong Learning Wales Record (LLWR). Further details are available in the Welsh Government Privacy Notice provided separately.

Appendix B – Employer Privacy Notice

NINE Training Limited collects and uses limited employer information to support the delivery of training programmes and to meet Awarding Body, quality assurance and funding requirements where applicable.

What information we collect

We may collect:

- Employer contact details
- Workplace details for assessment or observation
- Confirmation of learner employment (where applicable)
- Feedback relating to learner progress

Why we collect this information

We use employer information to:

- Arrange workplace assessment or observation where required
- Support learners in their job roles
- Meet Awarding Body and quality assurance requirements
- Meet funding body requirements where programmes are funded

Where this information is stored

- Employer information is stored securely within NiNe's central SharePoint system, on Maytas and on Smart Assessor. All platforms are accessible only to authorised staff.

Who we share this information with

We only share employer information where necessary with:

- Awarding Bodies
- Welsh Government (for funded programmes)
- Subcontracted staff working on behalf of NINE

Your rights

You have the right to request access to the information we hold about you and to request corrections where necessary.

You can contact us at: info@nine-traininglimited.com