

SIRM Privacy Statement

The School of Information Risk Management (SIRM) is the trading name of Numerica Risk Management and Consulting Ltd. The company registration number is 09031204 and our UKPRN is 10057622.

On 25 May 2018 a new data protection law, the General Data Protection Law (GDPR), comes into effect in the UK. The GDPR will give you more control over your personal data and greater transparency around how it is used. Our Privacy Policy is designed to give you information about how we collect, use, and store your personal data. Our Privacy Policy also sets out clearer information about your rights in relation to your personal data.

This Privacy Policy sets out how we fulfil our commitment to protecting your privacy in respect of maintaining the security of all kinds of personal information we receive. It also details how and when we use your personal information. The Privacy Policy forms part of our website terms and conditions and so by accepting our website terms or visiting sirm.ac.uk you are accepting and consenting to the practices referred to in the policy.

Our policies may change occasionally and we will keep our website updated with the latest set of policies. When you become a student/learner/apprentice or recipient of any service of SIRM, you are deemed to have agreed to abide by the terms of this policy as updated from time to time. The terms of this policy are only relevant to those aspects of SIRM's activities that affect your personal information.

This policy will detail how and why we collect, store and process personal information.

Personal information

Personal information means any information or pieces of information that can directly identify a person such as by name or indirectly via combinations of data including unique ID numbers, address, etc. This can also include email and home addresses, usernames, personal preferences, shopping habits, user-generated content and unique numerical identifiers such as a computer's IP address. Some of the data that we may hold about you may be regarded as 'sensitive personal data'. Examples of such data are health conditions or ethnic origins.

Collection of information

We collect personal information from the following:

These are instances when you have directly given us personal data:

- Completed enquiry forms
- Completed registration forms including next of kin details in case of emergencies
- Completed application forms
- CV
- Copies of certificates of qualifications/training previously achieved
- Other documentation such as learning styles questionnaires and equal opportunity forms
- Incoming emails
- Telephone and video conference calls
- During interviews (this includes notes taken during interviews)
- Examination/assessment bookings

SIRM Privacy Statement

There will also be occasions when we collect data from other means such as:

- Documents freely available to the public (i.e. electoral roll, third party websites)
- Cookies used to track visitor interactions on our website
- Other third parties, such as trusted partners

For tutors/trainers, we will also ask for referee information, references and bank information for payment of fees.

When we first obtain personal information from you, or when you undertake one of our services we will ask you to tell us if you want to receive information from us about other services, events or other matters. You have the right to indicate that you do not want to hear from us. If you choose to receive notifications from us you will be asked about your preferred communication method (telephone, email, post).

On occasions, we may obtain your personal data from a third party such as an educational agent/representative or UCAS during our student recruitment campaigns. In this instance, UCAS or the agent/representative should have informed you that your information may be shared with training providers such as SIRM and you will have consented to this. We will only hold this information on the sole basis that you may be interested in our training courses and programmes.

Types of information

We collect the following personal data:

- Name
- Address
- Email and other contact details
- Date of birth
- Job history (including information relating to placements through us)
- Educational history, qualifications & skills
- Visa and other rights to work or identity information
- Passport number
- National insurance number
- Next of kin and family details
- Contact details of referees
- Personal information relating to hobbies, interests and pastimes
- The information contained in references
- Other sensitive personal information such as health or learning records
- Your marketing preferences
- Proof of your right to live in the UK/EU (passport, visa, resident permit)
- Our records on your attendance and any welfare or behaviour issues

What we do with the information

In order to answer your enquiries about training and education, to provide you with training/education and to enrol you on courses we need to obtain certain information from you so that we can process your enquiry, application, enrolment and assessment or examination. We will only process the information that you give us to provide you with this service.

SIRM Privacy Statement

We collect personal data for the following purposes:

- To help us to identify you when you contact us
- To help us to advise you with your enquiries
- To assist with the provision of information about any of our past, current or future services
- To enable us to carry out marketing analysis, create learner/enquirer profiles and conduct research
- To carry out an assessment of your suitability for a specific training programme
- To provide information to an awarding body or a delivery or funding partner of ours
- To provide information to a regulatory authority or a statutory body
- To enable us to improve the functionality and design of our website
- To allow us to contact you about our services unless you have stated that you do not wish to be contacted by us
- To help us to identify and prevent loss or fraud
- To ensure that we can conduct equal opportunities monitoring
- To undertake auditing or compliance activities to fulfill contractual obligations that we may have with a trusted partner such as the ESFA or another training provider

Please note:

- We will not keep personal data for longer than is necessary to fulfil the above purposes which we collected it for i.e. the provision of our services
- Our standard data retention period is 6 years from the last date on which we were in contact with you, following this your personal data will be deleted
- We may monitor and record communications such as telephone conversations and emails for quality assurance and compliance checks
- We will not sell your personal information to third parties for the purpose of direct marketing
- We are not responsible for the privacy policies of any third party websites that may be linked to our website
- We are not responsible for any marketing messages which you may receive from third parties who have accessed your IP address via our website
- We can store your personal data on a suppression list so that we can ensure we do not contact you again if you ask us to stop sending you marketing communications, this is a legal obligation

Disclosure of information

Under legal obligations, we may be required to disclose your personal information to the Home Office or any interested government agency and with ESFA and for the Individualised Learner Record (ILR). Reference: <https://www.gov.uk/government/collections/individualised-learner-record-ilr>

When required to do so in connection with any legal proceedings including prospective legal proceedings we may disclose your personal data to exercise our legal rights.

If SIRM and its assets are acquired by a third party then all the personal data held by us about our students and stakeholders will become a transferred asset.

Sometimes we enter into trusted partnerships with other training providers such as further education colleges and universities to deliver training and in these instances, we would only

SIRM Privacy Statement

disclose information which is deemed to be necessary for funding, training and contractual purposes.

The internet and cookies

Communications on the internet through emails, web chats and webmails are not secure unless they have been encrypted. These messages or conversations can be hacked and we cannot accept any responsibility for any unauthorized access or loss of personal data that is beyond our control. As the internet is not a completely secure medium we cannot guarantee the absolute security of personal information.

We use Google Analytics as a marketing tool to track and assess the user's experience on our website. This tool can give us information such as IP address, geographical location, browser type, referral source, length of visit and number (and timing) of page views for each visitor to our website. This information will not be sufficient to personally identify individuals and will only be used for the purposes of improving our website and marketing. Google does these using cookies to evaluate your use of the website and to compile reports for us based on activity on the site. Google stores the information collected by cookies on servers in the United States and they may transfer this information to third parties when required by law or where third parties process the information on Google's behalf. Google will not associate your IP address with any other data that it holds. Google is a member of the US Safe Harbor Scheme and this scheme is regarded as providing adequate protection for personal data transmitted from Europe.

Cookies are files made up of pieces of text, including unique identifiers which are sent by web servers to web browsers and then may be sent back to the server each time the browser requests a page from the server. They are used by web servers to identify and track users as they navigate different pages on a website and to identify users who return to visit a website. Cookies can be stored in the cookie directory of a person's computer. There are two kinds of cookie, permanent (persistent) or session. Permanent cookies remain in your system after you have left the website and a random number is stored in your computer to determine how frequently a certain user visits our website. Session cookies expire when leaving a website or when you switch off your computer. Cookies are designed to give us information on which web pages users visit and what their journey around our website is like. This helps us to be better informed about how people use our website so we can improve our website and marketing.

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies. If you prefer to not have cookies operating on your device then you can adjust the browser settings to turn off the automatic downloading facility. However, if you block all cookies, it may have a negative impact on the usability of many websites. For instance, you may not be able to use password features on some sites and some navigation paths will stop as cookies are required for third-party integration features.

Security

We take security at SIRM very seriously in all aspects of our operations: physical, organizational and technological. We will do our best to take reasonable precautions to prevent unauthorized access to your personal information and which may result in a loss, misuse or alteration of your data and this is reflected in our policies, procedures and processes. For example, paper copies of information containing personal data will be kept

SIRM Privacy Statement

to a minimum and stored in locked facilities and computers will be protected with passwords. All staff are vetted and trained in their induction on the importance of safeguarding and privacy. We also have procedures in place to deal with any suspected breaches in data security and will inform you and any applicable regulators of such breaches where we are legally required to do so.

Children/young people

Where we recruit and enrol young people between the ages of 16 and 18 we will seek parental consent and inform the parents/guardians of what we will do with the information that we take and store. In addition, all staff are required to undertake a DBS vetting procedure.

Consent

We may process your personal data on the basis that you have consented to us doing so for a specific purpose. For example, this may be that you have given us your contact details so that we can respond to you with information that you have requested. In some instances, you may have given us your written or verbal consent to the use of your information for specific reasons, such as entering you for assessments.

When we ask you to enrol on our training programmes we will ask for certain information that will enable us to process your application and start you on the course and that will enable us to meet the requirements of funding obligations. For example, funding for an apprenticeship course requires that apprentices have lived in the UK for the last 3 years and are UK or EU residents. In this instance, we would need to have evidence of your residency and citizenship status. If you refuse to give your consent during the recruitment, application and enrolment processes we may not be able to accept you on a course or programme.

You are entitled to withdraw your consent to the processing of your personal data for a specific purpose at any point. However, for legal or contractual reasons we may have to continue to retain your personal information but only for the specific legal or contractual purposes. Withdrawal of consent will not have any effect on the lawfulness of any processing based on consent before its withdrawal.

Your rights

- You are entitled to **access** the information which we hold about you and this is called a Subject Access Request.
- You are also entitled to ask us to **correct**, complete or update any information which we hold about you.
- You may also ask us about **erasure** of your personal information. You may ask us to delete or remove personal information which is no longer necessary in relation to the purpose for which it was originally collected or processed or you have objected to it being processed and the continued use of that data cannot be justified. However, we may have a legitimate interest or a legal or contractual obligation to do so. In this instance, our processing will be limited to what is necessary to fulfil these interests or obligations.
- You may **object** to the processing of your personal information where we are relying on a legitimate interest and you object on the grounds relating to your particular circumstances. You may also object to automated processing, including profiling.

SIRM Privacy Statement

- You may ask for a **restriction** of the processing of your personal information. This may arise because you wish to establish the accuracy of the information or establish the reason for processing it or if you object to the processing.
- You may ask for the **transfer** of your personal information to another party when the processing is based on consent and executed by automated methods. This does not apply to any data processing that SIRM may carry out.

Before accessing and providing any personal information we will ask you to confirm your identity so that no other person is able to receive your personal data.

If you wish to access the information we hold about you or to make another request concerning this data, in line with your rights, please contact us. We may charge a fee to meet our administrative/management costs in providing you with the information that we hold on you.

Contact

We may update this policy from time to time, in line with UK and EU legislation and best practice. We recommend that you visit this page again to keep up to date. If you have any concerns about the data that we may hold on you please contact us by email at info@sirm.ac.uk and explain your concerns.

You have a right to complain to the Information Commissioner's Office (ICO) if you think there is a problem in the way that we are handling your data. Visit this page for further information: <https://ico.org.uk/concerns/>

Address

The School of Information Risk Management

Ilford Chamber, 4th Floor
11 Chapel Road, Ilford
IG1 2DR, United Kingdom
www.sirm.ac.uk
info@sirm.ac.uk
020 7078 7029