

Privacy Notice

Healthcare Pathway Pilot

Who Are We?

The Skills Development Scotland Co Ltd (“SDS”, “we”, or “us”) is the national skills body supporting the people and businesses of Scotland to develop and apply their skills.

Healthcare Pathway Pilot

The Healthcare Pathway Pilot is a programme developed by SDS supporting training of individuals (“participants”, “you” or “your”), and which is operated and delivered by our partner learning providers (“learning providers”) and funded by the Scottish Government.

SDS does not operate or deliver the Healthcare Pathway Pilot, but we do assist the Scottish Government to monitor and report on its delivery, quality and outcomes, as well as assisting in the monitoring of related equalities data.

Who is this Privacy Notice for?

This Privacy Notice primarily provides information to learners on the Healthcare Pathway Pilot programme around how their personal data will be processed, shared and stored.

What personal information do we collect and process?

1.The apprentice

- Information that you provide about you and your personal circumstances.
- Information about your Healthcare Pathway Pilot participation including details of your achievements and progress, your records of work and portfolios relating to your training and subsequent progression and outcomes from your training, how your training has gone and the impact it has had.
- Information you provide about yourself in the SDS Equalities Monitoring Form and any disability or care leaver form.

2.The Employer

- Information for contacting the Employer to alert them to and discuss any additional services offered by SDS from time to time.

How Do We Use Your Information?

	Types of information	Why does SDS use your personal information?	Under what legal basis does SDS use your personal information?
1.	Personal information.	To monitor our compliance with the conditions of funding related to the Healthcare Pathway Pilot programme and to ensure that we are properly spending and are accountable for those monies.	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest • necessary for reasons of substantial public interest
2.	Personal information	To generally help you find and retain suitable employment	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest
3.	Contact information.	To monitor, audit and evaluate the quality of your individual training and the Healthcare Pathway Pilot programme generally. (Evaluating may include requesting you to complete any questionnaire issued by or on behalf of SDS and/or Scottish Ministers)	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest
4.	Personal information.	To monitor your provider's compliance and performance including validating their claims for payment	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest
5.	Contact information.	To provide information to you about working life, fair work practices and the services and benefits you can access from SDS and other public sector or government bodies in Scotland and/or the UK	Fair and lawful because the intended processing is: <ul style="list-style-type: none"> • necessary for reasons of the public interest • necessary to fulfil SDS's or any of the other bodies' legitimate interests, where the processing isn't unreasonably

			detrimental, and doesn't relate to a core obligation of SDS or the other body
6.	Special category information (e.g. ethnicity, disability, sexual orientation)	To carry out equalities monitoring and to ensure we meet our Equality Act 2010 obligations	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of substantial public interest
7.	Personal information	To monitor and evaluate the training against applicable educational standards	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest • necessary for reasons of substantial public interest
8.	Personal information, Special category information (e.g. ethnicity, disability, sexual orientation)	To undertake statistical research regarding the value and impact of the Healthcare Pathway Pilot programme and to assist with policy development.	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for reasons of the public interest • necessary for reasons of substantial public interest
9.	Contact information.	To contact the Employer to alert them to and discuss any additional services offered by SDS from time to time	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for reasons of legitimate interest

When might we share your information?

The information collected shall be held by us or on our behalf and may be passed by us to other public bodies concerned with one or more of the following:-

- economic development
- skills development
- awards for vocational qualifications
- maintaining educational standards
- the provision of other public services or benefits
- ensuring compliance with legal obligations
- our internal/external auditors in each case, to the extent required to fulfil their respective public functions.

The information provided will also be shared with the relevant Training Provider/ Employer for the purpose of delivering the programme.

The information you provide to us about aspects such as your ethnicity and religion in the Equalities Monitoring Form will be passed to Scottish Government as we are required to report on this information under the Equality Act (2010).

We may work with private organisations to carry out surveys and evaluations on behalf of SDS for the purpose of evaluating the impact and effectiveness of the Healthcare Pathway Pilot programme. Any private organisation we contract with will be bound by terms and conditions that require them to comply with Data Protection legislation and ensure high standards of information security.

How do we protect your information?

Skills Development Scotland maintains a high standard of both physical and network security designed to protect paper or electronic forms of storage to hold and process your personal information.

Information that we hold about you will be subject to rigorous safeguards to ensure that it isn't accessed or disclosed inappropriately. We also take steps to ensure that your information is not damaged or rendered unavailable to those who have a right to see it.

To meet confidentiality requirements for our customers, stakeholders, and staff, Skills Development Scotland has Confidentiality, Data Protection and Information Technology policies and procedures in place, and we ensure that staff are fully aware of these and the associated guidance in relation to your personal information. These also apply when we dispose of paper records and delete electronic information in ways that ensure that your information cannot be recreated.

How long do we store your information?

Once you have been verified as a participant under the Healthcare Pathway Pilot programme by your provider, your personal data submitted to SDS by you and/or your Employer or Training Provider will be retained by SDS from the date it is provided until:

- 31st December 2026, for the purposes of monitoring and auditing checks.
- A period of 2 years after the completion of your course, for the purposes of research and analysis that aims to understand the long-term outcomes of individuals who have completed the Healthcare Pathway Pilot programme, so that we can improve our service and better meet the needs of people across Scotland.

The contact information of the Employer's representative will also be held from the date it is provided until 31st December 2026, in line with how long we hold the learner's data for monitoring and auditing purposes.

If you require any further detail or clarification on how long we will keep your personal information for and our reason for doing so, please feel free to get in touch with us through the contact information provided in the contact section below.

Your Rights

Under Data Protection legislation – including the UK GDPR and Data Protection Act 2018 - you have a number of rights in relation to how your personal information is processed.

If you wish to find out what these rights are, please see www.sds.co.uk/privacy and get in touch with DPO@sds.co.uk if you wish to find out more information or enact one of those rights.

Updating information

Please let us know if the personal information which we hold about needs to be corrected or updated.

Notice amendments

We may update this Privacy Notice by posting a new version on the website and, where appropriate, we will notify you by email.

Data Controller

The data controller responsible in respect of the information collected is The Skills Development Scotland Co. Limited, which is notified to the Information Commissioner as a data controller with registration number Z1445093.

If you remain dissatisfied with our response following any review related to a request you have made regarding your personal data, you are entitled to appeal to the Information Commissioner. Such an application should be sent to the following address:

Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow SK9 5AF
Phone: 0303 123 1113
Website: ico.org.uk/

Contact

If you have any specific queries regarding your rights, or any other matter, please contact the Data Protection team at DPO@sds.co.uk.

Skills Development Scotland
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