

## Privacy Notice

### 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.

### The Graduate Apprenticeship Project

The Graduate Apprenticeship project ("GA Project") is a project funded by SDS to support the training of individuals ("participants", "you" or "your"), and which is operated and delivered by Universities, Colleges or other educational or training providers ("training partners") and funded through SDS by the Scottish Government and the European Social Fund.

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

In doing so, SDS will collect and process the information about you in the following way:-

- **Information we collect and use**

We will collect and process the following personal information:-

- information that you provide about you and your personal circumstances, which shall include among other things, information you provide about yourself in any registration form, SDS equalities monitoring form and any disability form;
- information about your Graduate Apprenticeship including among other things, details of your achievements and progress, your records of work and portfolios relating to your training and subsequent progression and outcomes from your training;

- **Sources of information**

SDS will receive the above information from one or more of the following sources:-

- from you directly
- from your training provider;
- from your employer.

- **Organisations we may pass your information to**

- 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

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- the provision of other public services or benefits
  - our internal/external auditors
- in each case, to the extent required to fulfil their respective public functions.

The information you provide to us about your gender and disability in the Equality Monitoring Form will be passed to Scottish Government as a requirement of the European Social Fund provisions. The remaining information provided in the Equality Monitoring Form may be passed to any of the bodies identified above, but only in an anonymised form.

### • Legal Bases for processing the information

	<b>SDS and these other organisations that may receive the information from us may use the information for one or more of the following purposes:-</b>	<b>SDS is entitled to process the information as the intended processing is:-</b>
i	to monitor our compliance with the conditions of funding related to the GA Project and to ensure that we are properly spending and are accountable for those monies;	fair and lawful because the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of the public interest</li> <li>• necessary for reasons of substantial public interest</li> </ul>
ii	to monitor, audit and evaluate the quality of your individual training and the GA Project 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 the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of the public interest</li> </ul>
iii	to monitor your training provider's compliance with its competitive funding obligations including monitoring your training provider's training quality standards and compliance, and validating their claims for payment;	fair and lawful because the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of the public interest</li> </ul>
iv	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 necessary for reasons of the public interest

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v	to carry out equalities monitoring and to ensure equality of access to our programmes;	fair and lawful because the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of substantial public interest</li> </ul>
vi	to monitor and evaluate the training against applicable educational standards;	fair and lawful because the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of the public interest</li> <li>• necessary for reasons of substantial public interest</li> </ul>
vii	to undertake statistical research regarding the value and impact of the GA Project and to assist with policy development.	fair and lawful because the intended processing is one or more of the following:- <ul style="list-style-type: none"> <li>• necessary for SDS to comply with its legal obligations</li> <li>• necessary for reasons of the public interest</li> <li>• necessary for reasons of substantial public interest</li> </ul>

1. Please note that SDS or its agents may contact you as a participant in the GA Project from time to time by telephone, post, text or email or indeed arrange to meet with you directly to discuss matters associated with the provision of your training for the purposes of quality monitoring, training provider compliance with its funding obligations and quality assurance, validating training providers' claims for payment and/or measuring outcomes.
2. Once you have been verified as a participant under the GA Project by your training provider, your personal data submitted to SDS through any of the sources identified above will be retained by SDS from the date it is provided until the later of:-
  - a. 31 December 2022, or
  - b. the date occurring two years after the year end in which SDS submits its final accounts to Scottish Government for the whole graduate apprentice programme funded by Scottish Government. (Therefore, if the final

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accounts are submitted in September 2021, the date will be 31st December 2023).

3. SDS will become the 'data controller' in respect of all of the personal data in the information collected by or given to SDS under the GA Project. If you require any information regarding your personal data, please contact the Data Protection Officer at [DPO@sds.co.uk](mailto:DPO@sds.co.uk) or such alternative address as SDS may advise from time to time.
4. We identified the organisations we may pass your personal data to earlier in this Privacy Notice. Where any of the information is provided to any of these organisations, that body shall become the Data Controller in respect of the information we have passed to it. Your training provider will also be a 'data controller' in respect of your personal information. We recommend you review any privacy notice issued by any of these organisations in relation to their respective uses of your personal information.
5. If SDS make changes to this Privacy Notice we will post them on our website and, where appropriate, we will notify you by email. Please check back frequently to see any updates of changes to this Privacy Notice.
6. For more information about your rights under the Data Protection Act 1998 or, from 25 May 2018, the General Data Protection Regulation 2016 please see <https://www.skillsdevelopmentscotland.co.uk/about/policies/privacy> or the UK Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk)

Dated: 120318