

Privacy Notice

Graduate Apprenticeships

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.

We refer to the individuals whose personal data we may be processing as “apprentices”, “employers”, “learning providers”, “sole traders”, “staff”, “you” or “your” in this notice

The Graduate Apprenticeship Programme

The Graduate Apprenticeship Programme (“GA Programme”) is a programme funded by SDS supporting training of individuals, and which is operated and delivered by universities, colleges or other educational or learning providers (“learning partners”) and funded through a joint funding and delivery arrangement with the Scottish Funding Council (SFC).

SDS and SFC jointly fund the GA Programme and assist Scottish Government to report on its delivery, quality and outcomes, as well as assisting in the monitoring of equalities data.

Who is this Privacy Notice for?

This Privacy Notice provides information to participants on the Graduate Apprenticeship programme around how their personal data will be processed, shared and stored. It also provides information to: -

- the Apprentices’ Employers;
- the staff of the Learning Providers;
- Learning Providers who are sole traders;

around how their personal data will be processed, shared and stored

What personal information do we collect and process?

- 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.

SDS will receive the above information from you directly, from your training provider, or from your employer.

How do we use your information?

	Types of information	Why do SDS use your personal information?	Under what legal basis do SDS use your personal information?
1.	Personal information.	To ensure that you, the apprentice and/or the employer, is eligible for the Apprenticeship Employer Grant that you have applied for	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to perform a task in the public interest
2.	Personal information.	To monitor our compliance with the conditions for funding related to the GA 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 SDS to perform a task in the public interest
3.	Personal information.	To monitor your learning 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 it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations • necessary for SDS to perform a task in the public interest
4.	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 perform a task in the public interest
5.	Contact information.	To monitor, audit and evaluate the quality of your individual training and the GA Programme generally (evaluating may include requesting you to complete any questionnaire issues by or	Fair and lawful because it is: <ul style="list-style-type: none"> • necessary for SDS to comply with its legal obligations

		on behalf of SDS and/or Scottish Ministers)	<ul style="list-style-type: none"> necessary for SDS to perform a task in the public interest
6.	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 SDS to perform a task in the public interest
7.	Special category information (e.g. ethnicity, disability, sexual orientation)	To carry out equalities monitoring and reporting to ensure we meet our Equality Act 2010, including the public sector equality duty.	Fair and lawful because it is: <ul style="list-style-type: none"> necessary for SDS to comply with its legal obligations necessary for SDS to perform a task in the public interest necessary for reasons of substantial public interest, paragraph 8 of Schedule 1 of the Data Protection Act 2018 (Equality of opportunity or treatment)
8.	Personal information, Special category information (e.g. ethnicity, disability, sexual orientation)	To undertake statistical research regarding the value and impact of the GA Programme and to assist with policy development	Fair and lawful because it is: <ul style="list-style-type: none"> necessary for SDS to perform a task in the public interest necessary for reasons of substantial public interest, paragraph 8 of Schedule 1 of the Data Protection Act 2018 (Equality of opportunity or treatment).

Please note that SDS or its agents may contact you as a participant in the GA Programme 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.

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
- 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 learning provider / employer for the purpose of delivering the Graduate Apprenticeships Programme. The information you provide to us about aspects such as your ethnicity and religion in the Equality Monitoring Form will be passed to Scottish Government as we are required to report on this information under the Equality Act (2010).

We may share information (e.g. Scottish Candidate Numbers) with private/public organisations to carry out surveys and evaluations for the purpose of evaluating the impact and effectiveness of the FA programme. Any private/public 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 maintain 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 notices 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 an apprentice under the GA programme by your provider, your personal data submitted to SDS by you and/or your employer or provider will be retained by SDS from the date it is provided until:

- 31st December 2026, for the purposes of monitoring and auditing checks performed in relation to the European Social Fund.
- A period of 12 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 a Graduate Apprenticeship, 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 apprentice's data for monitoring and auditing purposes.

We will hold personal data related to the purpose of verifying evidence submitted to support claims by grant recipients under the Apprentice Employer Grant for a period of 3 years following the expiry of the Grant Relief period.

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 contacts 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. Please check back frequently to see any updates or changes.

How to make a complaint

If you have any concerns about the way your personal information is managed, or if you wish to make a complaint, please complete our [Customer Complaints Form](#). Should you remain dissatisfied with how we have handled your personal

information, you are entitled to escalate your complaint to the Information Commissioner, using the contact details provided below.

Data Controller

The data controller responsible in respect of the information collected if 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 Commissioners Office

Wycliffe House, Water Lane, Wilmslow SK9 5AF

Phone: 0303 123 1113

Website: ico.org.uk/

Contact

If you wish to get in touch regarding any queries about your rights, or for any other matter, please contact the Data Protection team at DPO@sds.co.uk.