

Privacy Notice for Learners

2025-26

Introduction

This privacy notice is being given to you in order to comply with the GDPR regulations that came into effect in May 2018. The purpose is to explain:

- What do we mean by personal information/data?
- What data do we collect
- How and why we collect personal information
- What we do with the information we collect
- How can you control what we do with your personal information

We will do this for each of the three main phases of your engagement with us:

- Applying for an Apprenticeship
- Enrolling on an Apprenticeship
- Participating in an Apprenticeship

Some Definitions

Data Controller - the legal entity that determines the purposes and means of the processing of personal information/data

Data Processor - the legal entity that processes (e.g. collects or stores it) on behalf of the data controller

General personal information/data - information that can identify you as an individual such as name, address, employment history etc.

Special category/Sensitive personal information/data - this includes things like information about race/ethnic origin, religion, sexual orientation, Mental health, trade union membership, biometric data or criminal records.

Your Rights

The main purpose of the GDPR is to strengthen and protect your rights as an individual. These include:

The right to be informed - we have a legal duty to explain to you how we are using your personal information for example by providing you with a Privacy notice like this one

The right of access - you have the right to request all information we hold about you at any time.

The right to rectification - you have the right to require us to correct any errors in information we hold about you

The right to erasure - you can instruct us to delete all/any personal information we hold about you

The right to restrict processing - you can instruct us how we may or may not use your personal information

The right to data portability - you can instruct us to provide you with a complete copy of all the information we hold about you (in an easy to use format)

The right to object - you can complain about any aspect of the way we are processing your personal information

Rights in relation to automated decision-making and profiling - we must always provide a human point of contact for dealing with queries relating to automated processing.

How do you give us your personal information?

What information do we collect and why?

Applying for an Apprenticeship

The usual way to apply for an Apprenticeship is through a Government website called 'Find an Apprenticeship' (<https://www.gov.uk/apply-apprenticeship>).

The Government department responsible for this website has its own Privacy notice that explains why it is collecting your data. This document can be found [here](#) or by asking our recruitment team (hello@boomtrainingltd.co.uk).

When we receive your application, we then add to information you have already provided by asking you to send us your CV and answer questions at a telephone interview. This is so we can give you information, advice and guidance about your career and employment options and so we can match you with suitable vacancies. We will also access your 'Personal Learning Record' to confirm your education history and previous qualifications.

Information we collect from applicants includes:

- Name & address

- Phone & email
- Date of Birth
- Employment history
- Education history and qualifications
- National Insurance Number
- Contact details of referees
- Hobbies and interests

Enrolling on an Apprenticeship

When you enrol on an apprenticeship we are required by the Department for Education to collect a significant amount of personal information about you, including some sensitive personal information. This is so that:

- the Government can monitor the effectiveness of the use of public funds (apprenticeships are mainly funded by taxpayers!)
- the DfE can monitor the performance of individual training providers and the impact of the apprenticeship scheme nationally
- Boom Training can design and deliver a training programme that includes all the support you need

Our legal justification for collecting personal information about you is 'legitimate business interest'. In other words we have to collect your personal information in order to provide you with the services and training we provide. Without this information, we would not be able to function effectively as a training provider.

Participating in an Apprenticeship

During your apprenticeship you will communicate with your Assessor Coach (and possibly other staff at Boom Training) for a range of reasons. These primarily include communications relating to coursework. However they may also include communications relating to:

- Your Safeguarding and wellbeing
- Feedback you provide about your experience as a candidate at Boom Training

These communications use a variety of methods, including:

- **Face-to-face meetings (including video calls and virtual classrooms)**
These include tutorials (notes of these are stored in Ecordia) and Progress Reviews (stored on Google Drive) and are retained and deleted in line with our funding agency contractual requirements (more information on this can be found in our [Policy and Procedures for Information Security & Data Protection](#)).

We may record video calls and other virtual sessions based on our legitimate interest. These recordings support the quality and effectiveness of our apprenticeship delivery, including for assessment, revision, and internal quality assurance. Recordings are made only where necessary and are securely stored in line with our data protection policies.

There is a separate statement explaining how this data is used and stored in [Appendix 1: Privacy statement for call recording](#)

- **Email**

We use Gmail and Intercom for our email communications, and email correspondence will remain stored on these servers indefinitely unless you specifically ask us to delete it

- **Text messaging**

This will also remain on the devices used for the correspondence unless you or your Assessor Coach delete those conversations

- **Phone calls**

These may be used instead of video calls for tutorials or other support. Again, in rare cases, an Assessor Coach may ask to record a call (see appendix 1).

If you've started a Data Analytics apprenticeship **on or after 27 May 2025**:

As part of your apprenticeship, you will also use third-party platforms for learning, communication, assessment, and scheduling (e.g., Learning Platform, Zoom, Discord, Salesforce, Calendly, Intercom, Typeform). There is a separate [Learning Platform's Privacy Policy](#).

These systems are managed on our behalf and may collect data such as:

- Login times and participation records,
- Audio/video recordings of sessions,
- Communication logs (e.g., messages or chat content),
- Device and technical information (e.g., IP address, operating system)

The learning platform and associated systems may use cookies and similar technologies to enhance functionality, track attendance, and analyse engagement.

These cookies are managed by the Data Processor under our instruction.

What we do with your information

Using

We use your personal information for the following purposes:

- To contact you about vacancies
- To match you with suitable apprenticeship opportunities
- To provide you with advice and guidance about your career, employment and training options
- To comply with Government/ESFA rules and regulations (enrolled apprentices)
- To register you with the relevant Awarding Body and/or End Point Assessment Organisation
- To Safeguard your health and wellbeing
- To inform additional support needs you may have in order to complete your apprenticeship successfully
- To analyse our performance e.g.:
 - improve operational efficiency and effectiveness
 - ensure we attract applications from individuals of all backgrounds regardless of age, gender, ethnicity, sexual orientation and ability
 - ensure candidates of all backgrounds achieve their qualifications

Storing, archiving, deleting and protecting

We use third parties (other companies) who provide us with storage facilities for our electronic data files and information. All of these suppliers have updated their policies and procedures to ensure they are compliant with data protection laws and we have signed agreements in place with these organisations to confirm this. All of our suppliers have security and back-up systems in place that are compliant with UK Government and EU regulations. In other words your information is completely safe and secure.

In some cases we have printed copies of documentation and some of this may contain personal information. All such documentation is kept in locked file storage at our offices in Southampton to ensure that this is also safe and secure.

If you have applied for an Apprenticeship but do not actually enrol, we will keep your details on file for a period of 6 (six) months. At the end of this period, your information will be deleted from our electronic storage systems and any printed records will be securely destroyed by a licensed safe disposal company (and paper is recycled).

If you have enrolled on an Apprenticeship, we are required by Government regulations to keep your details on file until 31 December 2030. After this date your details will be securely destroyed.

Any data held by our learning platform provider is stored only for the duration of your apprenticeship or as long as legally required. Once the service ends, your data will be securely deleted.

Sharing

We share your information with the ESFA and intermediary funding partners through whom we access ESFA funding. We may also occasionally be required to share it with Ofsted for quality monitoring purposes.

What we DO NOT do with it

We will NEVER:

- Sell your information to any third party for commercial purposes
- Try to sell you anything
- Contact you about anything not relevant to you enrolling on and/or participating in an Apprenticeship programme

How to control your personal information

The information we hold about you belongs to you. At any time you can ask us to:

- Send you the personal information we have on file that relates to you
- Ask us to delete your personal information. We will have to secure permission from the ESFA to do so
- We cannot control the information that has already been passed to third parties. However, we can advise you on how to contact them about your personal information if you need to

How to find out more

If you have any queries about your personal information, please email hello@boomtrainingltd.co.uk or call 023 8000 4210.

Appendix 1: Privacy statement for call recording

If you've started an apprenticeship before 27 May 2025:

We may ask to record a tutorial session or a Progress Review meeting. This can include video calls, phone calls or virtual classroom sessions. Where we do so it will be for one of the following reasons:

- Portfolio evidence for assessment
- Revision
- Observation of teaching, learning and assessment

In this case the recording will be stored in Ecordia, our ePortfolio which is secure and password protected. The only people who can access this are the learner, the Assessor Coach, the employer, Boom Training's Lead Internal Quality Assurer (IQA) and the End Point Assessor or Awarding Body External Quality Assurer (EQA). In extremely rare cases the recording may also be viewed by an Ofsted inspector. The recording will only be used as evidence for assessment of Knowledge, Skills or Behaviours relevant to achievement of the apprenticeship.

If you've started an apprenticeship on or after 27 May 2025:

We record tutorial sessions and Project Review meetings, and from the 1st October 2025, open sessions, under the lawful basis of legitimate interests. These recordings are necessary to support portfolio assessment, revision, and quality assurance of teaching, learning, and assessment.

A Legitimate Interests Assessment has been conducted to ensure that this processing is necessary and balanced against your rights and freedoms. A summary of this assessment is available upon request.

For Data Analytics, the recordings will be stored in a secure and password-protected Zoom.

For all other programs, the recordings will be stored in Ecordia. The only people who can access this are the learner, the Assessor Coach, the employer, Boom Training's Lead Internal Quality Assurer (IQA) and the End Point Assessor or Awarding Body External Quality Assurer (EQA). In extremely rare cases the recording may also be viewed by an Ofsted inspector. The recording will only be used as evidence for assessment of Knowledge, Skills or Behaviours relevant to achievement of the apprenticeship.

The sections below explain how these recordings will be stored, used and deleted when no longer required.

Portfolio Evidence for Assessment

In this case the recording will be stored in Ecordia, our ePortfolio which is secure and password protected. The only people who can access this are the learner, the Assessor Coach, the employer, Boom Training's Lead Internal Quality Assurer (IQA) and the End Point Assessor or Awarding Body External Quality Assurer (EQA). In extremely rare cases the recording may also be viewed by an Ofsted inspector. The recording will only be used as evidence for assessment

of Knowledge, Skills or Behaviours relevant to achievement of the apprenticeship.

Observation of Teaching, Learning and Assessment

Recordings used for either of the above purposes may also be used by internal quality assurance staff to observe the teaching practice of the Assessor Coach and provide them with feedback. Where the recording is stored in Ecordia, those staff have access to all learner records by default. Where a recording is stored on the Google Drive, access will only be given to specific individuals who need to view it for this purpose.

There may be other occasions when your Assessor Coach asks for a session to be recorded specifically for this purpose. In this case, the recording will be stored on the Google Drive and access will be given to you and the individual undertaking the observation.

There may be other occasions where an observer is invited to join a session to observe it 'live'. In this case, the observer may also record the call in order to revisit it later with the Assessor Coach. These recordings will be stored in the Google Drive in a folder specifically created to store lesson observations. Access to files in that folder will be restricted to the observer, other IQA staff (if relevant) and the Assessor Coach.

Deletion

Recordings will be deleted in accordance with Government regulations. Further information can be found in our [Policies and Procedures for Information Security and Data Protection](#).