Learner Privacy Notice

October 2026

Introduction

Realise Training Group and its subsidiaries ("the Company") is committed to protecting the privacy and security of personal information. This notice explains how the Company collects and uses personal information about learners during and after their course or programme.

This notice is intended to provide the information required by the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018. It should be read alongside any course-specific, funding-body or service-specific privacy information provided to you.

Scope

This notice applies to learners who use the Company's training, apprenticeship or employment-related services. It covers personal information obtained directly from you and, where relevant, from your employer, funding bodies, government departments, awarding organisations, education providers and other authorised sources.

Who is responsible for your information?

The relevant Company legal entity providing your service is the data controller for the personal information described in this notice. If you are unsure which entity is responsible, contact the Data Protection Officer using the details below.

Registered office: First Floor, Cygnet House, 1 Jenkin Road, Sheffield S9 1AT.

Data protection principles

The Company will process personal information lawfully, fairly and transparently. Personal information will be:

- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date where necessary;
- kept for no longer than necessary;
- protected by appropriate technical and organisational measures; and
- handled in a way that enables the Company to demonstrate compliance.

Personal information we may collect

- identity and contact details, including name, title, address, telephone number and email address;
- date of birth, gender and National Insurance number;
- next of kin and emergency-contact details;
- qualifications, prior learning, achievements and employment history;
- course, attendance, assessment, progress, support and outcome information;

- funding, eligibility and right-to-work information;
- communications, complaints and records of contact; and
- images captured by CCTV where you visit Company premises.

Special category information may include information about health, disability and ethnic origin. The Company will collect and use it only where necessary and where both an Article 6 lawful basis and an Article 9 condition apply.

Where we obtain personal information

The Company may obtain personal information directly from you and from authorised third parties, including your employer, the Department for Education, the Learning Records Service, awarding organisations, education providers and service providers. Where information is obtained from another source, the Company will provide the additional information required by law unless an exemption applies.

How and why we use personal information

Purpose	Typical information	Lawful basis
Enrol, plan, manage and deliver learning or employment services	Identity, contact, eligibility, course, attendance, assessment and progress information	Contract; legitimate interests where necessary to administer and improve services
Meet statutory, regulatory, funding and audit requirements	Identity, National Insurance number, eligibility, learning and outcome information	Legal obligation; public task where applicable
Create or check learner records, including a Unique Learner Number and Personal Learning Record	Identity, date of birth, prior learning and achievements	Legal obligation or public task, as applicable
Provide learner support and make reasonable adjustments	Contact, course, health and disability information	Contract or legal obligation; applicable Article 9 condition
Safeguard learners and protect vital interests in an emergency	Contact, emergency-contact and relevant health information	Vital interests; applicable Article 9 condition
Monitor equality of opportunity and meet reporting requirements	Ethnic origin, health and disability information	Legal obligation or public task; substantial public interest where applicable
Protect premises, people, systems and information	CCTV images, access records and security information	Legitimate interests; legal obligation where applicable
Communicate about related courses or opportunities	Contact details and preferences	Consent where required; legitimate interests where permitted

Where the Company relies on legitimate interests, those interests include delivering and improving services, administering learner relationships, preventing fraud, maintaining security and protecting

the Company's legal rights. The Company considers whether those interests are overridden by your rights and freedoms.

Special category personal information

The Company will process special category information only where a condition in Article 9 UK GDPR and, where required, Schedule 1 to the Data Protection Act 2018 applies. Depending on the purpose, this may include employment, social security and social protection law; substantial public interest; provision or management of health or social care; vital interests; or explicit consent. The specific condition must be recorded in the Company's processing records before the processing begins.

Sharing personal information

The Company may share personal information where necessary with:

- the Department for Education and the Learning Records Service;
- Ofsted, awarding organisations, regulators, auditors and funding bodies;
- your employer or placement provider where relevant to your programme;
- service providers acting on the Company's instructions, including learning, assessment, hosting, communications and IT providers;
- professional advisers, insurers, law-enforcement bodies, courts and public authorities where legally required or necessary; and
- another organisation involved in a business transfer or restructuring, subject to appropriate safeguards.

Service providers must process personal information only for agreed purposes, apply appropriate security and confidentiality measures, and comply with the Company's written instructions and applicable data protection law.

We will share your personal information with the DfE. The information you supply will be used by the DfE to issue you with a Unique Learner Number (ULN), and to create your Personal Learning Record. For more information about how your personal information is processed and shared with the DfE refer to the Extended Privacy Notices available at:

guidance.submit-learner-data.service.gov.uk/26-27/ilr/ilrprivacynotice

LRS privacy notice - GOV.UK

Data retention

The Company keeps personal information only for as long as necessary for the purpose for which it was collected, including legal, funding, accounting, audit and reporting requirements. Retention periods are set in the Company's retention schedule and take account of the nature and sensitivity of the information, risk of harm, applicable limitation periods and statutory or contractual requirements. Contact the Data Protection Officer for information about the period or criteria that apply to a particular record.

Artificial intelligence and automated tools

The Company may use artificial intelligence and other automated tools to assist with activities such as administration, communications, learner support and service improvement. Where these tools

process personal information, the Company will identify an appropriate lawful basis, provide relevant privacy information, apply appropriate security and human oversight, and assess data-protection risks where required. The Company will not use learner personal information to train a general-purpose artificial intelligence model unless it has established a lawful basis and provided any additional information required by law.

The Company does not currently make decisions about learners that have legal or similarly significant effects without meaningful human involvement. If this changes, the Company will explain the decision-making process, its significance and likely consequences, and the safeguards and rights available to the learner.

Data security and breaches

The Company uses appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, misuse, alteration, unauthorised access or disclosure. Access is restricted to people who need the information for their role, and they are subject to confidentiality obligations.

The Company maintains procedures for identifying, assessing and responding to personal data breaches. It will notify the Information Commissioner's Office and affected individuals where required by law.

Your rights

Depending on the circumstances, you may have the right to:

- receive information about how your personal information is used;
- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request erasure of personal information;
- request restriction of processing;
- object to processing based on legitimate interests or public task, and object at any time to direct marketing;
- receive personal information in a portable format where the legal conditions apply;
- withdraw consent at any time where consent is the lawful basis, without affecting earlier lawful processing; and
- request human intervention and challenge a decision where qualifying solely automated decision-making is used.

These rights are not absolute. The Company may need to verify your identity and may ask for information needed to locate the relevant records. You do not need to use a particular phrase for the Company to recognise a rights request.

Your responsibilities

Please tell the Company promptly if your personal information changes so that records can be kept accurate and up to date.

Contact details and complaints

For questions, concerns or requests, contact the Data Protection Officer:

- Email: dpo@realisetraining.com
- Post: Data Protection Officer, Realise Learning & Employment, First Floor, Cygnet House, 1 Jenkin Road, Sheffield S9 1AT

You also have the right to complain to the Information Commissioner's Office. The Company would welcome the opportunity to address your concern first, but this does not affect your right to contact the Information Commissioner's Office.

Changes to this notice

The Company may update this notice where its processing activities or legal obligations change.