

1. Introduction

This notice applies to people receiving services from Novus.

There is a summary version of this policy available on request from Novus staff, or at: <https://www.novus.ac.uk/privacy/>

2. What is the purpose of this document?

Novus is part of LTE Group. We are committed to protecting the privacy and security of personal information. This notice describes how we collect and use personal information in accordance with data protection laws.

If you have any questions regarding this document or your personal data, you or your representative can contact our Data Protection Officer, or you can ask any Novus staff to do this on your behalf:

- LTE Group, Whitworth House, Ashton Old Road, Manchester M11 2WH
- You or your representative can also contact us via: dpo@ltegroup.co.uk

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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The categories of personal information that we may collect, store, and use about you may include:

	Learners	Parent / guardian
Age	✓	
Complaint information	✓	✓
Employment/education information/history (where relevant)	✓	
Ethnicity/nationality*	✓	
Gender	✓	
Health, including any medical conditions, injuries or learning difficulty and disability status*	✓	
Parent or guardian contact information (for under 18s)	✓	
Personal information and contact details	✓	✓
Photograph to be used for exams, e.g., CSCS card (where relevant)	✓	
Photographs of you/your work	✓	
Photography and video of you/your work	✓	✓
Prison management information and prison number	✓	

4. How is your personal information collected?

We typically collect personal information through the information you provide to us during the induction process. We may collect additional information during your time with Novus.

5. How will we use information about you?

Overall, we use your personal data to provide you with Novus services. We have set out the main purposes for processing below.

Purpose	Lawful Basis
To let you access Novus services	<ul style="list-style-type: none">Performing a task (education) in the public interestWe have a legal or contractual obligationWe have a legitimate interestTo protect your vital interests (e.g. in an emergency)We have your consent
To comply with health and safety rules	
To monitor equal opportunities	
To undertake audits	
To process any complaints you may make	
To protect you in an emergency	
To research and plan within Novus and LTE Group	

Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another lawful basis). If we do process your personal information based on your consent, we will inform you of this before we start the processing and you will have the right to withdraw your consent at any time.

6. If information is not provided

If you do not provide personal information, we may not be able to provide you with access to our services, or we may be prevented from complying with our legal or contractual obligations.

7. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We do not intend to take any decisions about you in this way. We will notify you in writing if this changes.

8. Data sharing

We may share your personal information with third parties, such as the custodial operator, awarding organisations, employers, parents of under 18s, and other learning/education providers. A full register of who we share your personal data with and why is available on request from the DPO. We may also have to disclose your personal information by law, or to comply with the law, if an Authority asks us.

All third parties are required to take appropriate security measures to protect your personal information. We only allow them to process your personal information for specific purposes. They must do this in accordance with our instructions.

Your data may be transferred outside of the UK, for example, where we use third party providers to deliver our services, such as externally hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

9. Data security

We have measures in place to help protect your information. We limit access to the information. Only authorised parties who have a legitimate need to know can access it.

We have procedures to deal with any suspected security breach. We will notify you of a suspected breach where we are legally required to do so.

10. How long will you use my information for?

We will only retain your personal information for as long as needed. We have a **Data Retention Schedule** which outlines how long we keep information. This is available on request by contacting our DPO, using the details in [Section 2](#).

11. Your individual rights in connection with personal data

Under certain circumstances, by law, you have the right to request:

- **Access** to your personal information
- **Correction** of the personal information we hold about you if it is incorrect.
- **Erasure** of your personal information. We can only do this in certain circumstances.
- **Restriction** of processing of your personal information
- **Transfer** of your personal information to another party.
- **Object** to processing of your personal information
- **Suspend** processing of your personal information

If you wish to make any requests regarding your personal data, please speak with any member of the Novus team, or contact the DPO, using the details in [section 2](#). If you make a request, we may need specific information from you, or your representative, to confirm your identity.

12. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

The Company Secretary & General Counsel
LTE Group
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

This can be done through live chat on the ICO website, or via the telephone:
www.ico.org.uk/livechat

0303 123 1113

More information on the ICO's complaint procedure can be accessed at:
<https://ico.org.uk/make-a-complaint/>