

Privacy Notice

Learning & Development

Both the Credit Services Association Limited and CSA (Services) Ltd (**collectively “the CSA”**) process personal data. We respect your privacy and are committed to protecting your personal data.

This notice is intended to help you understand all about our processing of personal data and your rights when we process it. It sets out how we are going to use that personal data, including how long we’ll hold it for and the reason we are processing it. But if you have any questions about the processing that this document doesn’t answer, please feel free to contact us.

1. Who is the CSA?

- 1.1 This notice is issued on behalf of the CSA group of companies - Credit Services Association Limited and CSA (Services) Ltd.
- 1.2 Credit Services Association Limited is the only national UK trade association for the debt collection and debt purchase industry. We represent the industry to key stakeholders, including regulatory bodies and government, set out best practice for the industry and provide guidance and support to member companies.
- 1.3 CSA (Services) Ltd is a wholly-owned subsidiary of Credit Services Association Limited which provides training and development services to both our member and non-member companies in relation to debt collection, debt purchase and associated activities.
- 1.4 The CSA’s contact details are as follows:

Credit Services Association
2 Esh Plaza
Sir Bobby Robson Way
Great Park
Newcastle-upon-Tyne
NE13 9BA

0191 271 0775
info@csa-uk.com
www.csa-uk.com

- 1.5 The CSA does not employ a data protection officer, but you can speak to our Head of Regulatory Compliance & Standards, Claire Aynsley, or our Compliance Manager, Daniel Spenceley, if you have any questions in relation to this notice or concerns about any data protection issues. You will find more details about your data protection rights in a later section.

2. What is personal data?

- 2.1 Personal data is information about a living person, by which that living person can be identified, either directly (i.e. the information itself identifies the person) or indirectly (i.e. whoever holds the data can identify the person by combining the information with another piece of information to which they have access).

- 2.3 In addition to ordinary personal data, there are also special categories of personal data, which demand stronger protection measures. These include data relating to a living person's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, membership of a trade union, and genetic or biometric data.
- 2.4 When it comes to processing special categories of personal data, we will only process this where:
- We have your explicit consent to process the data
 - We must process the data to carry out a legal obligation
 - We must process the data for reasons of substantial public interest
 - You have already made the data public
- 2.5 In circumstances where we have asked for your consent to process special category personal data, we will be clear about precisely what we intend to use the data for. When we ask for consent, you have full control over the decision to give or withhold consent; you will continue to have control afterwards too and can withdraw it at any time.

3. What types of personal data does the CSA process? And what do we do with it?

- 3.1 The CSA primarily processes personal data in order to provide, maintain and monitor our various training programmes.
- 3.2 We process personal data about learners and prospective learners. This data is processed for several purposes including:
- providing training programmes to learners, including carrying out assessments and communicating results
 - responding to and acting on feedback
 - providing training records to employers, learners and other relevant organisations, such as awarding bodies
 - meeting our legal and regulatory obligations, including requirements around safeguarding and the prevent duty
 - assessing prospective learners for eligibility on certain training programmes
 - obtaining the appropriate funding for an apprenticeship
 - monitoring equality and diversity
 - providing support for learners
 - registering learners with professional bodies
- 3.3 We will process contact and identification information, which may include name, address, e-mail address and telephone number.
- 3.4 With certain qualifications, particularly those that involve government funding, we may need to process additional personal data. This may include your National Insurance number, your unique learner number and your date of birth, as well as information about your salary, employment history and education background.

- 3.5 We may also process payment information, which will commonly be company-specific, but might also include personal payment details (e.g. individual's company credit card; sole trader's bank account).
- 3.6 Specific information about the management of the training programme, including login information for the CSA learner management system, any feedback you supply, examination and assessment results, coursework and any tutor feedback, will also be processed.
- 3.7 We may also process special category personal data when you take up one of our training programmes. This will commonly be health information, so that we can make any necessary adjustments for a disability, health issue or training need, and in order to monitor diversity, prevent discrimination and meet our safeguarding obligations. It may also include information about your dietary requirements, so that we can ensure these are accommodated at any training courses.
- 3.8 Information about your ethnic origin and gender may also be processed for purposes of monitoring diversity. Where possible, this will be anonymised.
- 3.9 We will collect personal data about you from you, your employer and, where relevant, from tutors. We will also collect information about results and feedback from awarding organisations, professional bodies, end point assessors and other training providers.
- 3.10 Where a qualification is subject to government funding, we may also collect personal data from the government.

4. What are the legal bases for the CSA's processing activities?

- 4.1 When we process personal data, we will always have legal grounds to do so. Data protection law sets out the different legal grounds that allow companies to process personal data, which include:
- in order to perform a contract that we are party to
 - in order to carry out legally required duties
 - in order for us to carry out our legitimate interests
 - to protect your interests
 - where something is done in the public interest
- 4.2 We will process personal data about learners in order to supply the expected training programme in accordance with our contract with your employer (and commitment statement, where training is part of an apprenticeship). This data is processed in order to perform the contract to which we are both party.
- 4.3 We are also legally required to process certain personal data about learners, particularly where they are involved in government-funded programme, in order to comply with our legal and regulatory obligations. This includes sharing data with the Education & Skills Funding Agency (ESFA), awarding organisations and regulatory bodies such as Ofsted.
- 4.4 Where we process special category data, we will ask your permission to process this information and we will explain specifically why we are asking for it and how we will process

it, unless we need to process this information under a different legal basis. Where we obtain your consent, you will be able to withdraw your permission at any time.

- 4.5 Please note that withdrawing permission to process health information may affect our ability to make suitable accommodations for learners' needs (e.g. dietary requirements; necessary adjustments for disability).
- 4.6 We may also process special category data for reasons of substantial public interest, in order to meet our obligations around [safeguarding](#) and the [prevent duty](#).

5. Who is my data shared with? Where is personal data stored?

- 5.1 Learner data is shared with tutors for purposes of monitoring attendance and delivering courses. It is also shared with premises providers to accommodate any preferences or requirements, and to enable the premises providers to comply with relevant legislation and regulation (health and safety; equality and diversity; disability discrimination).
- 5.2 Data will also be shared and made available to the ESFA, your employer, awarding organisations, regulatory bodies (such as Ofsted), external auditors and quality assurance providers.
- 5.3 Personal data is stored on different cloud-based systems depending on the training product. These systems include Cognisoft, BKSB and E-Learn Design. Personal data is also stored on the CSA's internal servers or in hard copy in the CSA office.
- 5.4 Where we share data with third parties or where we use third party systems to store data, we will take necessary precautions to ensure that the third parties have appropriate data protection measures in place.
- 5.5 The CSA, or some of our partners or service providers, may pass information outside of the UK and the European Economic Area (EEA) into jurisdictions where privacy laws, obligations and rights may vary. For such transfers, we will always ensure that appropriate assurance checks and measures are put in place to protect your privacy.

6. How long is personal data kept for?

- 6.1 Where you are studying for a qualification, personal data is retained for the duration of your course and several years beyond, depending on the type of qualification. This will vary from 3 to 10 years. In relation to apprenticeships, we are legally required to retain some personal data for auditing purposes.
- 6.2 After this period, it will be anonymised, with all personal data securely deleted or destroyed. You will not be identifiable from the anonymised data.
- 6.3 If you are registered with the Collector Accreditation Initiative system or the CSA Compliance Essentials system, personal data will be retained only as long as you continue to use the product. Personal data will be deleted when your subscription expires or is terminated.

7. Does the CSA make automated decisions about me or profile me?

7.1 The CSA does not make automated decisions, nor do we carry out profiling.

8. What can I do if I want to see the personal data held about me? What are my rights in relation to my personal data?

8.1 The individuals whose personal data we process have several rights. This includes the right of access to the personal data we process. If you wish to exercise this right and see the personal data that the CSA holds, you can make this request by contacting us by e-mail, in writing or on the telephone. Our contact details are noted above.

8.2 Where we process your data on the basis of consent or the performance of a contract, we may be required to provide some of your personal data to you in a portable format, or to another data controller on your behalf. Only data that you have provided to us is subject to this right. If you would like to exercise this right, please contact us by e-mail, in writing or on the telephone.

8.3 You also have other rights including:

- The right to have inaccurate data corrected. If you know or believe that we are processing inaccurate information about you, you have the right to have that corrected.
- The right to object to our processing. This will depend on whether we have a valid legal basis to process your data.
- The right to request that we restrict the data we process, or even have it deleted. Again, this will depend on the circumstances – we are not always required to delete your data or restrict our processing, if we can demonstrate we have a valid legal basis for processing it.

8.4 If you want to exercise one of these rights, please contact us so that we can act on your request or explain why we will be continuing to process the data we hold.

9. Who can I complain to if I'm unhappy about the use of my personal data?

9.1 If you would like to complain about our data processing, please contact us by e-mail, in writing or by telephone with details of your complaint.

9.2 Data protection is regulated in the UK by the Information Commissioner's Office.

9.3 If you want to know more about data protection, or if you want to complain about our processing of personal data, you can contact them at the details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

- 9.3 You can also report concerns about companies' use of your personal data to the Information Commissioner's Office here: <https://ico.org.uk/concerns/>

10. Changes to this notice

- 10.1 From time to time, we will review this document, for example, where there are changes to laws or regulations, or where we make substantial changes to our processes, procedures or systems.
- 10.2 In such cases, we will update this notice to reflect the relevant changes and we will make reasonable efforts to contact and update those affected if the changes are substantial in nature.

Contact us

T: 0191 217 0775
E: info@csa-uk.com

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