

Privacy Policy

Introduction and Purpose

The Institute of Cast Metals Engineers (ICME) is committed to protecting and respecting your privacy. ICME are a registered End-point Assessment Organisation (EPAO) with the Education and Skills Funding Agency (ESFA) and provides End-point Assessment services to Apprentices. We have this policy in place to be clear and transparent about our commitment to data privacy and its alliance to the requirements of the Data Protection Act 1998 and, in substitution from 25 May 2018, the General Data Protection Regulation 2018 (“GDPR”) in respect of handling and processing personal data.

ICME is registered with the UK Information Commissioner’s Office as a Data Controller and a Data Processor.

This policy is combined for the use of ICME’s EPAO provision as well as the membership and training department of ICME.

Throughout the course of ICME’s performance of its End-point Assessment services, we collect and process personal data relating to Apprentices’ as detailed below;

- To fulfil our obligation as a registered EPAO
- We may need to process the data for the performance of our contract with your Training Provider and other relevant parties, for the purposes of our legitimate interests

We may need to use your personal information in the following situations, which are likely to be rare;

- Where we need to protect your interests (or somebody else’s interests)
- Where it is needed in the public interest or for official purposes

This policy sets out the basis on which ICME as an End-Point Assessment Organisation (EPAO) we will;

- Collect personal data
- Store personal Data
- Share and retain personal Data
- Dispose of personal Data

Please read the policy carefully to understand our views and practices regarding your personal data and how we will treat it.

Review arrangements

At ICME we shall review the policy annually as part of our self-evaluation arrangements to ensure that it is fit for purpose and that it continues to reflect the requirements of End Point Assessment.

However, a review will be commissioned earlier should any issues arise in relation to any findings through review processes or changes to legislation.

Any review of policies are signed off by Finance and General Purposes committee (F&GP) before being issued.

Document Version History

Issue Date	Author	Summary of Changes	Date of next Review
05/05/2018	J Cartwright	Creation of Policy	May 2019
06/11/20	A Worrallo	Amend Policy to include EPAO Provision. Now V2	November 2021

Information we may collect from you

When you provide information to the Institute of Cast Metals Engineers, either because you are a Member or work with the Institute of Cast Metals Engineers, or to request a service or make an enquiry, we may ask for specific information from you in order to provide that service to you.

We may collect and process the following data about you:

- You may give us information by filling in a form or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you become a member as well as information you provide when making an enquiry or attending an event where ICME is present or represented. The information you give us may include your name, address, e-mail address and phone number as well as information about your work, job role, skills, qualifications and experience.
- Information we collect about you. With regard to each of your visits to our website, we may automatically collect the following information:
 - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
 - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time): foundries and suppliers you have searched for: page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse overs) and methods used to browse away from the page.
- Information we receive from other sources. We are also working closely with third parties (including, business partners, contractors in technical and payment services, analytics providers, search information providers) and may receive information about you from them.

All individuals have the right to access the information Institute of Cast Metals Engineers holds about them. The Institute of Cast Metals Engineers will also take reasonable steps ensure that this information is kept up to date by asking you whether there have been any changes to information.

Data received from Training Providers

ICME collects Apprentice personal data as a data controller. Training Providers and, in some cases, Assessors will provide ICME with data for the processing of assessments for Apprentices. The personal data is usually limited to the details required for us to undertake the basic functions of an EPAO, such as performing assessment services and claiming a certificate on behalf of an Apprentice. This personal data will include, but may not be limited to;

- Apprentice's name, date of birth, gender, workplace address, email address, mobile telephone number, Unique Learner Number (ULN), assessment results and qualification awarded

In line with our regulatory requirements, Apprentice data will be held by ICME for six years following the End-point Assessment.

It is important to us that contractual arrangements with those individuals from Training Providers clearly set out how you will use their data and with whom it could potentially be shared. We require all our customers to comply with the GDPR. By adding individuals' personal data to our ICME systems, or by sending personal data via email or by other methods to ICME, you are therefore giving consent to us processing the data and you confirm that you have obtained the appropriate consent from the relevant individuals for the personal data to be processed by ICME.

- In line with our regulatory requirements and requirements to deliver future services such as certificate re-prints and the confirmation of Apprenticeship Standards, this basic Apprentice-level data will be held by ICME indefinitely.
- Information processed as part of an Apprentice's qualification, such as physical exam papers, will be held for a maximum of 6 months.
- Personal data captured as part of a quality visit (such as video evidence of training) will be used for the purpose and outcomes of the visit, and then destroyed or deleted.
- Apprentices may also contact ICME to request certificate replacements. In these circumstances, a record of an Apprentice's address is taken so that the certificate can be sent. This is held on file for a maximum of 6 months before it is destroyed or deleted.
- We collect Tutor/Assessor/Technical Expert and Provider contact personal data as a Data Controller and use it for the purpose of applications, Once the application has been successful this data will be held securely on our systems for the duration of the contract.

We will review incomplete Tutor/Assessor/Technical Expert and Provider applications annually and delete those over 12 months old.

Special Category Data

We may also collect, store and use the following special categories of more sensitive personal information, known as special categories, for the purpose of complying with any legal obligation we have under the Equality Act 2010, such as to apply access arrangements and reasonable adjustments to your End-point Assessment. This information includes but is not limited to;

- Information about your health, including any medical conditions, health and sickness records
- Information about your race, ethnicity, religious beliefs and sexual orientation

We will process this data strictly for the purpose described and will disclose it only where necessary to ESFA or other regulator, and to any External Quality Assurance body for the purposes of audit to evidence compliance with legal and regulatory obligations.

Training Provider/Employer Contacts

You may provide us with information about provider or employer contacts who will administer the activities associated with ICME on behalf of the provider.

We will collect this information as a Data Controller. These details may include:

- names, email addresses, telephone numbers, billing information;
- information about other personnel and contacts for the provider/employer. For example, organisational charts, health and safety and other policies which may include personal data.

It is important that you seek permission from the provider and employer contacts if you provide their personal data to us. We may use the provider or employer contact's personal data for the functions described in the ICME Service Level Agreement, which include:

- communicating activities between the centre and the Awarding Body. For example, to inform the centre of course or exam results and to send certificates;

- identifying relevant people with whom we should communicate in order to organise and undertake external quality visits or End-point Assessments
- communicating regulatory changes and updates, and, if permitted, marketing ICME's services

The provider and/or employer contact's details will be retained for as long as we provide a service to you. If provider or employer contacts leave the organisation, it is the organisation's responsibility to inform ICME so that personal details and accounts can be disabled and removed where appropriate.

Assessors, Technical Experts and internal quality assurance (IQA) staff

Assessors, Technical Experts and quality assurance staff provide ICME with information about their experience and qualifications that confirm their ability to End-point Assess ICME's Apprenticeship Standards. Within our multi department company we engage in services of Freelance consultant and suppliers for a variety of purposes at ICME. As such, ICME may hold a substantial set of personal details about an Assessor, Technical Expert, IQA and other staff. These details may include:

- names, email addresses, telephone numbers and other contact information
- Identification documents including National Insurance Number
- Bank Details
- CV's
- teaching and training qualification certificates
- proof of professional qualifications
- employment history and training experience; and
- references

This data is required for regulatory purposes to ensure that we meet the necessary conditions of the Regulator. We collect this information in the capacity of a Data Controller.

We ensure that we seek permission from the individuals before they provide us with their personal data.

- This data is held on ICME's systems and finance software
- This data remains on ICME's systems for as long as the individuals continue to be an Assessor, Technical Expert or IQA for ICME. Contracts are renewed annually, and inactive partnerships are deleted from systems where required.
- If an Assessor, Technical Expert or IQA requires their personal data to be removed from ICME's systems because they are no longer fulfilling the role, they need to inform ICME so that relevant data can be removed from the systems.
- It is necessary to share bank details with our bankers to make payments for services, ICME will always ensure that the details are only processed using secure banking systems. We will never share this information elsewhere, outside of the company unless required to do so by a regulatory or legal authority.
- Potential CV's will be considered on receipt, shared with internal staff members and destroyed should no suitable vacancies be available. ICME does not store potential CV's
- References will be requested from former employers as part of employment terms/Service Level Agreements.

Cookies

Our website site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website site and allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site, such as the member's area.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using it. This helps us to improve the way our site works, for example, by ensuring users are finding what they are looking for easily.

How we use information about you

We use information held about you in the following ways:

- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information and service that you expect from us as a Charity and Professional Body, as a provider of training, or to deal with enquiries and respond to your requests, or as part of a published news article.
- To provide you with information about services we feel you may benefit from.
- To ensure that content from our website is presented in the most effective manner for you and your computer
- To complete our Regulator requirements to undertake the functions of an EPAO, such as performing assessment services and claiming a certificate on behalf of an Apprentice
- To apply access arrangements and reasonable adjustments to your End-point Assessment
- In line with our regulatory requirements and requirements to deliver future services such as certificate re-prints and the confirmation of Apprenticeship Standards

Information we collect about you

We will use this information:

- To administer our website and for internal operations, including troubleshooting, data analysis and testing.
- To improve our website site to ensure that content is presented in the most effective manner for you and for your computer.
- To allow you to participate in interactive features of our service, when you choose to do so.
- As part of our efforts to keep our site safe and secure.
- To measure or understand the effectiveness of our search facility.
- To make suggestions and recommendations to you and other users of our site about the services we provide that may be of interest.
- Information we receive from other sources. We may combine this information with information you give to us and information we collect about you
- To complete our Regulator requirements to undertake the functions of an EPAO, such as performing assessment services and claiming a certificate on behalf of an Apprentice
- To apply access arrangements and reasonable adjustments to your End-point Assessment
- In line with our regulatory requirements and requirements to deliver future services such as certificate re-prints and the confirmation of Apprenticeship Standards

Disclosure/Sharing of your information

We may share your information with selected third parties. We share your personal data with your consent or as necessary to complete any transaction or provide any product you have requested or authorised. When you provide payment information we will share payment data with banks and other entities that process payment transactions or provide other financial services, and for fraud prevention and credit risk reduction.

In regards to EPA specifically ICME will never share personal data that is held on our systems with any third parties other than ICME's employees, consultants and sub-contractors. Some other parties we may share Apprentice data with are the following;

- The Assessors performing the End-point Assessment
- The External Quality Assurance (EQA) body selected to carry out this function as part of the End-point Assessment
- The Institute for Apprenticeships (IFA)/Education and Skills Funding Agency (ESFA) to claim a certificate on the Apprentice's behalf
- National Learning Record Service (LRS) – This is where the Unique Learner Numbers are provided from
- Investigations and activities required by Regulatory Bodies such as the ESFA, Ofqual and the EQA

At ICME we utilise a number of suppliers of services where personal data is shared including but not limited to;

- Pension Provider for the administration of the corporate pension scheme
- Data base/Website hosting supplier for the hosting of our databases and websites

We will share your information with third parties to carry out a service, for example sending you a copy of the Member's journal, publishing an article, because you are a registrant on the Engineering Council's Register of Professional Engineers or are seeking registration (as ICME is a professional body), to external governing bodies (as ICME is a provider of training/EPA) or to process your application for membership. Deceased member's details maybe passed on for the purpose of obituaries but this will not be done without the consent from the immediate family.

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, our licence as a professional body, as a provider of training (to external governing bodies) or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property or safety of the Institute of Cast Metals Engineers, our Trustees, or others. This includes exchanging information with other companies and organisations for the purposes of accounts, fraud protection and credit risk reduction.

We also share personal data with vendors or agents working on our behalf for the purposes described in this statement. For example, companies we've hired to provide customer service support or assist in protecting and securing our systems and services may need access to personal data to provide those functions. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us for any other purpose.

In all cases, including special category data, if we do share data, we require third parties to take appropriate security measures and only process your data for specified purposes.

Marketing

ICME holds a marketing spreadsheet/database that contains the basic details of individuals who have consented to ICME sending information about our services in both memberships, commercial training and EPA services, to them, via email or post.

Each marketing email that is sent provides you with the ability to unsubscribe from receiving marketing emails at any time. Alternatively, you can opt-out by sending a request specifying your new choice to info@icme.org.uk

We may at times contact you or a named contact by email with important updates that you must be made aware of. These updates are mandatory and for regulatory reasons you are unable to unsubscribe from these. We will also on occasion send you communications which we believe will be of legitimate interest to you regarding new approved standards, commercial training and services, which you will be able to unsubscribe to should you wish.

Where we store your personal data

Information and records will be stored securely and will only be accessible to authorised individuals. These are likely to be only the employees, freelance/consultant's, EPAO assessors, EPAO Quality Assurance (IQA's), Technical expert's membership assessors and the Trustees of the Charity. We ensure that these individuals are trained and understand the contractual requirement for following good data protection/GDPR practices.

At ICME we have organisational measures in place to safeguard the security of staff, Apprentice and Provider/Employer data. These measures include - limiting access to folders and files to those who only require access to them, enforcing a rigorous data retention and destruction policy and password protecting those documents. All of ICME's systems are stored on a secure set of servers. These servers reside in the United Kingdom and the data is frequently backed up and stored in the backup servers. This is in a secure server hosting facility with the necessary environmental, physical and technical controls in place to ensure unapproved access is prevented.

We have in place contracts with third parties to protect data from unauthorised use, modification, destruction or disclosure. Where a third party is managing these systems they are also taking the necessary processes to ensure data is stored securely in line with our contract. ICME review these contracts to ensure compliance.

ICME's email data is stored with Microsoft and located in EU data-centres and follows Microsoft standard security and backup processes.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website site contains links to and from the websites of partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data.

Our Retention of Personal Data and your Right to Removal

ICME have adapted its policies and procedures to ensure we are fully compliant with GDPR. This document (policy) has been produced to represent our current status. This policy will be reviewed annually and updated as processes are developed or legislation is changed.

The Institute of Cast Metals Engineers retains personal data for as long as necessary to provide the service you have requested, or for other essential purposes such as complying with our legal obligations as a charity and an EPAO, resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly. The criteria used to determine the retention periods include:

- How long is the personal data needed to provide the products and operate the work of the charity? This includes such things as keeping our systems secure and maintaining appropriate and financial records. This is the general rule that establishes the baseline for most data retention periods.
- Do individuals provide, create or maintain the data with the expectation we will retain it until they affirmatively remove it? In such cases, we maintain the data until you request it to be deleted.
- Is there an automated control that enables the customer to access and delete the personal data at any time? If there is not, a shortened data retention time will generally be adopted.
- Is the personal data of a sensitive type? If so, a shortened retention time would generally be appropriate.

- Has the Institute of Cast Metals Engineers adopted and announced a specific retention period for a certain data type? Retention and Disposal Policy.
- Has the user provided consent for a longer retention period? If so, we will retain data in accordance with your consent.
- Is the Institute of Cast Metals Engineers subject to a legal, contractual or similar obligation to retain the data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation or data that must be retained for the purposes of litigation.

All information included in this policy about EPAO has the length of time we keep the data included within it.

The Trust has a Retention and Disposal policy that is followed and copies may be requested from the Office Manager.

Under GDPR legislation, individuals have certain rights when it comes to the control of personal data, these rights are outlined below;

- **The right to be informed** – Each individual has the right to be given information about how their data is being processed and why. ICME have provided this policy to show you how we handle your data.
- **The right of access** – ICME has a duty to comply with the requirements of Subject Access Requests (SAR)
- **The right to rectification** – GDPR includes the right for individuals to have inaccurate personal data rectified or completed if it is incomplete.
- **The right to be forgotten** – You have the right to ask ICME to remove your data, though we might have a legal obligation to retain the information for the period stated in this policy.
- **The right to restrict processing** – You may restrict processing for a legitimate reason, we would still have the right to hold that information
- **The right to data portability** – You may be able to obtain the information we hold about you and use it for your own purposes. Conditions apply.

Should you wish to exercise any of your rights above, then please email info@icme.org.uk stating the following information;

- Name
- Contact Details
- Relationship to the subject
- Full details of information relating to your request
- Reason for your request
- The right being exercised

You will be asked to verify your identity if you are the subject, alternatively you will be asked to provide consent from the subject if you are a representative.

Should we require additional information from you we will contact you.

Your request will be dealt with within **one month** of receipt of your request.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on the website. Please check back frequently to see any updates or changes to our privacy policy.

Contact us and guidance

If you have any queries about the contents of this policy or wish to gain further guidance or give feedback please contact 0121 7521810 or email epainfo@icme.org.uk

