**Completing Learner Paperwork Remotely**

Advice - Covid-19 response – 21/22

## Introduction – the purpose of learners completing and signing a Learner Registration form

When completing a Learner Registration form the first section a potential learner/customer completes is the privacy notice. This informs the customer:

* Who will process and store their data (ie who we are)
* Why we collect their data
* The legal basis for collecting their data
* Who we will share this data with
* How we protect their data
* How we store their data, and for how long
* Their rights over their personal data

This section then provides links to the full privacy notices available and informs the customer that we may wish to contact them after the course but they can opt out of the Education and Skills funding agency, and it’s partners, from contacting them if they wish.

The customer is then asked to sign the document. It is important to note that this signature is not giving consent to processing their data in this way but is a demonstration that they have been made aware of the way we are processing their data.

### Completing a Learner Registration form on behalf of a learner

1. A member of staff completing a learner registration form on behalf of a learner should ideally do so whilst talking to the customer on the phone as it is more difficult to convey all the details without ‘back and forth’ communication.
2. If a customer has an active email address or other method to review written information the member of staff should arrange to send the registration form to the customer.
3. If the form is going to be emailed to the customer the member of staff should read the section titles of the registration form and ask the customer to read the details when they receive the electronic copy of the form.
4. The member of staff should then explain that we may wish to contact the customer at a later date to find out what the impact of the learning intervention was but that they can opt out of the ESFA or its partners contacting them. The staff member should then go through the different contact options.
5. The member of staff should then explain that a signature would normally be required at this stage to say that the customer understands the information on the form, but that if the customer is happy they will sign on their behalf. The member of staff should explain that the customer is not giving consent as the legal basis for collecting and processing their data is ‘public task’ not ‘consent’ (there is more information on the Information Commissioner website – www.ico.org.uk).
6. If the customer is happy with the content of the completed form emailed to them, they should email back to the staff member confirming that the information is correct. This emailed confirmation should be attached to the enrolment form. The staff member is to clearly sign and print their name and job title and then date the form for processing as normal. If the customer wants more time to consider what this information means the staff member should refer them to the links on the form or the Information Commissioner’s website (which contains information about the different legal basis for collecting data) and arrange a time to call back.
7. If the customer does not have access to email or another method to receive written communication then the member of staff should read all of the privacy statement section of the registration form to the customer as well as completing the actions above.

### Conclusion

It should be emphasised that these actions are in response to the exceptional circumstances around the covid-19 outbreak and do not represent ‘normal practice’, which is to work face to face with a customer where possible.

We will keep staff up to date with any changing guidance.

All members of staff should complete the 6 module iLearn module on data security as well as the 10-part quiz to ensure knowledge of data security is retained.

If further information is required please contact the Senior Officer – Intelligence, Commissioning and Performance; [matthew.smith@cheshirewestandchester.gov.uk](mailto:matthew.smith@cheshirewestandchester.gov.uk)

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