



# Skillsfirst Awards Ltd

## GDPR Data Protection Privacy Policy

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v2

A decorative graphic consisting of several overlapping curved lines and arrows. The lines are in shades of blue and green, and the arrows are in dark blue, pointing upwards and to the right.

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## **GDPR Data Protection Privacy Policy**

Skillsfirst Awards Ltd is committed to protecting personal data that is obtained during the course of its business, including when liaising with recognised centres, EPA customers, learners, centre staff and any related third party.

This policy explains what personal data (information) we hold about you, how we collect it, and how we use and may share personal data. We are required to notify you of this information under data protection legislation. Please ensure that you read this policy and any other similar notice we may provide to you from time to time when we collect, or process personal information about you.

### **Who collects the information**

Skillsfirst Awards Ltd, Suite 416 Fort Dunlop, Fort Parkway, Birmingham, B24 9FD is a 'data controller' and gathers and uses certain information about you. In this policy, references to 'we' or 'us' means Skillsfirst Awards Ltd, also referred to as Skillsfirst and Skillsfirst Assess (EPAO).

### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information.

### **About the information we collect and hold**

The table set out in Appendix 1 summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

We may also need to share some of the categories of personal information set out in Appendix 1 with other parties, such as external contractors, professional advisers, systems suppliers (hosting providers) and potential purchasers of some, or all of our business, or on a re-structuring. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators and education bodies (including, but not limited to Department for Education (DfE), Education and Skills Funding Agency (ESFA), Learning Record Service (LRS), The Office of Qualifications and Examinations Regulations (Ofqual)), insurers, or as required to comply with the law.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect, or to the purposes for which we collect and process it.

### **Where information may be held**

Information may be held at our offices, and third party agencies, service providers, representatives and agents as described above. This is integral to Skillsfirst's business operations; Skillsfirst cannot provide its services without this.

## International transfers

Some of our recognised centres may be based outside the European Economic Area (EEA) so their processing of learners' personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it, by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we transfer data to learning centres based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us if you want further information on the specific mechanism used by us when transferring any of your personal data out of the EEA.

## How long we keep your information

We retain your information for no longer than is necessary, for the purposes for which the personal information is processed. Skillsfirst will retain the personal data for all learners, irrespective of whether they have completed a Skillsfirst qualification, or withdrawn from the qualification for 50 years effective from the registration date, after which point it will normally be destroyed.

Further details on this are available upon request.

## Your rights to correct and access your information and to ask for it to be erased

Please contact our Operations Director via [customerservices@skillsfirst.co.uk](mailto:customerservices@skillsfirst.co.uk) if (in accordance with applicable law), you would like to correct, or request access to information that we hold relating to you, or if you have any questions about this policy. You also have the right, in certain circumstances, to ask us for some, but not all of the information we hold and process to be erased (the 'right to be forgotten'). We will provide you with further information about the right to be forgotten, upon request.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach, where we are legally required to do so.

## How to complain

We hope that we can resolve any query or concern you raise about our use of your information. In the first instance please contact our Operations Director via [customerservices@skillsfirst.co.uk](mailto:customerservices@skillsfirst.co.uk). Alternatively, contact the Information Commissioner at [ico.org.uk/concerns/](http://ico.org.uk/concerns/) or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

## Appendix 1 - About the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Learner name, date of birth, gender, ethnic origin, nationality, Skillsfirst learner number, unique learner number (ULN), contact details (i.e. address, home and mobile phone numbers, email address)</p> <p>Learner registration and completion dates; apprenticeship start and end dates</p> <p>Learner job title and employer details (i.e. contact name, address)<sup>1</sup></p> <p>Details of assessments, qualifications, units and standards achieved</p>	<p>From Skillsfirst recognised centres and/or Skillsfirst Assess providers</p> <p>In some circumstances learners may contact Skillsfirst directly and provide this information</p>	<p>For the purpose of performing our functions as an Awarding Organisation and End Point Assessment Organisation (Skillsfirst Assess)</p> <p>The identification of a learner</p> <p>Legitimate interest: to maintain learner and customer records and to comply with legal, regulatory and corporate governance obligations and good practice</p>	<p>For the purpose of performing our functions.</p> <p>Data may be shared with our regulators, other educational bodies where appropriate and our external contractors / professional advisers</p>
<p>Details of recognised centre and EPA provider's staff, to include name, contact details i.e. home and mobile phone numbers, email address.</p> <p>All supporting documentation required to confirm centre staff competency to deliver Skillsfirst qualifications (i.e. CV, copy of qualification certificates)</p>	<p>From Skillsfirst recognised centres and/or Skillsfirst Assess providers</p> <p>In some circumstances centre staff may contact Skillsfirst directly and provide this information</p>	<p>For the purpose of performing our function as an Awarding Organisation and End Point Assessment Organisation (Skillsfirst Assess)</p> <p>Legitimate interest: to maintain customer records and to comply with legal, regulatory and corporate governance obligations</p>	<p>For the purpose of performing our functions.</p> <p>Data may be shared with our regulators, other educational bodies where appropriate and our external contractors and our professional advisers</p>

You are required (by law, regulatory requirements or under the terms of your agreement with us, or in order to enter into an agreement with us) to provide the categories of information specified above to us where applicable<sup>1</sup>, to enable us to provide you with the ability to deliver Skillsfirst qualifications; for Skillsfirst Assess to carry out end point assessments for your learners; to administer our learner and customer records. If you are unable to provide this information, we will not be able to:

- recognise you as a Skillsfirst centre to deliver our qualifications
- agree for you to deliver Skillsfirst qualifications (this relates to the competency of centre staff)
- register a learner for a Skillsfirst qualification or unit
- certificate a learner for a Skillsfirst qualification or unit
- engage with the provider to carry out end point assessments for your learners
- claim the learners apprenticeship certificate (the standard)

If you would like further details on how we handle sensitive personal information, or information relating to criminal convictions and offences, please contact us at [customerservices@skillsfirst.co.uk](mailto:customerservices@skillsfirst.co.uk)