

Skills4Stem Data Protection Policy

Skills4Stem respects the privacy of all individuals and takes very seriously its responsibilities under the Data Protection Act 1998 (“DPA”). This policy is designed to ensure that all information held on individuals is properly handled in all cases.

The DPA requires that the “personal data” of living individuals that is kept by Skills4Stem Ltd on computer or well structured paper files must be “processed” in accordance with eight principles.

Personal data is defined very widely and is any data from which a living individual can be identified either from the information alone, or with other information which is in (or likely to come into) the possession of the UK operating company. Examples of personal data include names, addresses, and photographs, CCTV images of individuals, salary/job titles or opinions which allow individuals to be identified. Personal data also includes “sensitive personal data” – this is information about an individual’s racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life or criminal offences/proceedings.

“Individuals” could be any living person – for example, employees, agency staff, customers, contractors, suppliers and job applicants.

“Processing” includes obtaining, recording, holding, using, disclosing or erasing the personal data. In effect almost any activity involving personal data will fall within the scope of the DPA.

Skills4Stem’s policy is to comply with the DPA and it does not condone anyone processing personal data inappropriately on its behalf. Any breach by Skills4Stem employees or any of its contractor companies of the DPA may lead to fines and/or enforcement action being taken against Skills4Stem, ILM or other partners by the Information Commissioner (the body that enforces compliance with the DPA). Of equal concern is that any breach may attract media scrutiny and may lead to a potentially adverse impact on our reputation.

This policy applies to all Skills4Stem staff (including employees, agency workers, contractors and temporary staff) and partner organisations who may process personal data about employees or other individuals. Compliance with this policy is mandatory.

The Managing Director (or her delegate) for Skills4Stem has the responsibility for establishing and implementing effective practices and procedures across it to give effect to this policy. This policy will be reviewed on an annual basis by the Skills4Stem Senior Management Team.

Contractors and companies operating on behalf of Skills4Stem

Skills4Stem must satisfy itself that any third party that it appoints to process personal data on its behalf (such as a payroll processor, events coordinator or a flexible benefits administrator) understands its responsibilities under the DPA. Skills4Stem require a written contract with that third party that requires the third party to act only on instructions from Skills4Stem and to comply with obligations equivalent to those imposed on Skills4Stem relating to security of the personal data.

SKILLS4STEM DATA PROTECTION NOTICE

We, Skills4Stem Ltd., are required to comply with the provisions of the Data Protection Act 1998 (the Act) in relation to how we handle any personal data we obtain from you. Any personal information we gather will only be used in the context of your employment with us OR the business we conduct with you. We may also collect Sensitive Personal Data about you, but only with your explicit consent in advance.

We may process all the information we obtain from you to enable us to fulfil our contractual obligations to you and we may request further information from third parties or disclose your details to other selected third parties, such as ILM, City & Guilds or their regulators or industry bodies.

We may from time to time email or post to you (or your company) details of products or courses we believe may be of interest to you. If you no longer require such information or you have provided us with any information that you no longer wish us to use, please contact us at info@skills4stem.co.uk.

In disclosing your personal details to us, you agree that we may process and in particular may disclose your Personal Data:

- As required by law to any third parties.
- To selected third parties who may process Personal Data on our behalf.
- To third parties such as ILM who may use your personal data or sensitive personal data (as appropriate) to:
 - ❖ Enable us to fulfil our contractual obligations to you – for example by providing you with an examination certificate;
 - ❖ Contact you directly about events, courses, programmes, or ILM membership
 - ❖ Carry out statistical analysis
 - ❖ Pass to their regulator or industry bodies to (1) monitor equal opportunities relating to ethnicity or disability, or for other such monitoring purposes or to (2) account for learners where there is a requirement to do so, or to (3) meet their requirement to contact you directly and the information is not readily accessible from any other source
 - ❖ Disclose and publish your details in directories which may contain information about Skills4Stem
 - ❖ Provide or arrange prizes, remuneration and awards
 - ❖ Contact you about your ILM studying membership. Page 12 of 12
- If we pass your Personal Data to ILM it:
 - ❖ May transfer your Personal Data outside the European Economic Area (EEA) and if they do they will make every reasonable effort to ensure that

any transferred data receives the same protection as if it would within the EEA.

- ❖ Undertakes that it and its staff will take every reasonable step possible to protect the confidentiality and security of all material it receives, to carry out its various responsibilities.

You have the right to have us correct any inadequacies in the personal details we hold about you, and to object to any direct marketing we carry out using your personal details. You also have the right to ask for a copy of the information we hold in our records. Please contact us at info@skills4stem.co.uk if you want a copy of the personal data we hold about you.