



DATA PROTECTION POLICY

The Company willingly accepts its obligations under the General Data Protection Regulations 2018 (the “Regulations”). We wish to be seen as vigilant in our defense of confidentiality and the security of personal data and open in our preparedness to show that data, where permitted under the Regulations, to the data subject. Compliance with the Regulations will ensure respect for the privacy of our employees, our customers, our learners and our clients.

Scope

In order to operate efficiently, Skillcert have to collect and use information about people with whom it works. These may include learners, current, past and prospective, employees and suppliers. In addition it may be required to collect and use information in order to comply with the requirements of funding bodies.

This personal information must be handled and dealt with safely and securely, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means, and there are safeguards within the Regulations to ensure this.

The scope of this policy covers all of the above and applies to all established and temporary employees and others such as contractors, consultants and those employed under a contract for service.

Personal Data

Personal data is information about living, identifiable individuals. Personal data does not have to be particularly sensitive information and can be as little as a name and address. **You must not deal with or generally use personal data in any way outside your authorised duties.**

Always follow the Company’s specific security measures in respect of the personal data you process. For example, take extra care when personal data is on screen that no one looks over your shoulder and never leave papers and files containing personal data out where they could be easily read by someone who is not authorised to see them.



Practices of Data Protection include:

- Using data lawfully.
- Keeping personal data secure and confidential.
- Considering the rights of individuals at all times.
- All staff being responsible for complying with data protection requirements.

Data Protection Principles

The Regulations provides that personal data must be:

- Processed fairly and lawfully.
- Processed for specific lawful purposes.
- Adequate, relevant and not excessive for the purpose.
- Accurate and where necessary kept up to date.
- Kept no longer than is necessary for that purpose.
- Processed in accordance with the rights of data subjects.
- Kept secure at all times to avoid accidental loss, destruction or damage.
- Not transferred outside the EU unless privacy is respected regarding data processing.

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/>

Procedure for assessing your own personal data

Individuals may apply to view their personal data, either held manually or on computerised records, by applying to the holder of their data. This may be to their manager or HR Department. In all cases, you may be asked to view the data later; normally this will be arranged within 2 working days.

If you believe that data that is stored is unfair, unreasonable, out of time or inaccurate, you may request that this information be removed from your records and disposed of confidentially.

If the holder of the information does not deem your request for data to be removed acceptable, such issues will be dealt with within the context of the company grievance procedure.

Disciplinary Procedures

You should be aware that the Company's disciplinary procedure will apply in cases where there is a breach of this policy. Serious cases of misuse of data or disclosure of information may amount to gross misconduct leading to summary dismissal.



Criminal Liability

Breaches of the Regulations may attract personal criminal liability. Criminal liability will arise if you knowingly or recklessly, without the consent of Skillcert Ltd, obtain or disclose personal data or procure the disclosure of another person of personal information.

Responsibility

Everyone is responsible for data protection and for compliance with the Regulations and its principles and you should always bear in mind the Data Protection Principles whilst carrying out your duties.

The Head of Compliance has the responsibility for ensuring the maintenance, regular review and updating of this policy. Revisions, amendments or alterations to the policy can only be implemented following consideration and approval by the Managing Director.

Data Controller – Amy Oliver – amy.oliver@skillcert.co.uk

ICO Registration Number – **ZA215316**

Review Procedure:

The Assessment Policy will be reviewed annually.

Current version: v4
Reviewed by: Amy Oliver
Issued: 14/05/25
Next review date: 14/05/26
Signed by: (Name & role) Amy Oliver – Head of Compliance 