Skillbase People Development Ltd
Data Protection Policy
In compliance with the General Data Protection Regulations (EU) 2016/679 (GDPR))

Effective from 1st January 2018

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Introduction

This document sets out the policy for all activities carried out under Skillbase People Development Ltd by its Directors, Employees and Associates, and is for the information of clients and people in receipt of Skillbase services.

This policy is reviewed annually at year start and mid-year by the Skillbase Board, to ensure both operational compliance and its continued appropriateness to the business as it develops.

Data Protection Officer

A named Board member has designated responsibility for compliance with data protection legislation. The designated Board member is Jennie Shannon.

Skillbase definitions of personal and sensitive personal data under GDPR

PERSONAL DATA	SENSITIVE PERSONAL DATA
Personal data includes information about a living individual where it can be connected to a name, home address, date of birth, National ID, passport or tax number (e.g. payroll record).	Sensitive personal data relates to a person's physical, physiological, genetic, biometric, mental, economic, cultural or social identity; also, anything that reveals political opinions, racial or ethnic origin, religious beliefs, trade union membership, sexual orientation and health status.
Within the context of the Skillbase business, we only use personal data when one or more of the following apply: • We have consent • It is necessary for the preparation and/or performance of a contract with the data subject • It is necessary for compliance with a legal obligation • It is necessary to protect the vital interests (e.g. immediate health needs) of the data subject • It is necessary for the purposes of legitimate interests	**Within the context of the Skillbase business, we only use sensitive personal data when one or more of the following apply:** • We have consent • It is necessary under employment law, collective agreement or other law • The data has already been made public by the data subject • It is required by judicial authorities • It is necessary for the protection of public health Our default approach to the use of sensitive personal data is for there to be explicit consent from the data subject(s). In the event of any doubt, use of sensitive personal data is reviewed by our Data Protection Officer.

Use of personal data in Skillbase

Skillbase processes and stores personal data in the following areas:

Sales, Business Development and commercial contacts

- Contact details of clients with whom we have commercial relationships
- Contact details of organisations and individuals with whom we communicate and include in our marketing and business development activities

This data is held in Skillbase and not passed on to any third party.

Service delivery

- Contact information on people who take part in our training programmes, assessment centres and feature in any other client projects
- Results of assessments and tests related to people who take part in our training programmes and assessment centres and other client projects
- Other personal information which may be collected, analysed and held as part of a defined client project under any of our service lines

This data is held in Skillbase for a period agreed with the client and unless agreed otherwise, is only shared with the client who has commissioned the work and the individual to whom it is related.

Following the completion of a client engagement, once the client has all the data they require, paper records are destroyed and electronic records are deleted from Skillbase systems within 6 months.

Employees

- Personal data related to the employment contract including address and identity, right to work, medical reports relevant to employment, pay, benefits, banking and taxation

This data is held in Skillbase and shared as appropriate with our Accountancy service provider (which includes outsourced payroll and taxation services) and in response to legitimate enquires from public authorities (e.g. tax, immigration).

Associates

- Personal data related to the Associate Contract including address and identity, right to work, medical reports relevant to operating as an Associate, banking and taxation

This data is held in Skillbase and shared as appropriate with our Accountancy service provider (which includes taxation services) and in response to legitimate enquires from public authorities (e.g. tax, immigration).

Data Protection Checkpoints and Impact Assessments

Each client project undertaken has a Data Protection Checkpoint (DPC) at its inception and prior to commencement in order to identify whether the project creates any new data protection issues or risks and to make appropriate arrangements or changes to this policy.

The DPC includes confirming with our client that they have the necessary policy and process in place in order that the end-to-end handling of data, by the client and by Skillbase, complies with GDPR standards. The DPC will be conducted by the MD (Sarah Wilson) as part of project sign-off.

In event of a project or situation where data processing is likely to result in high risk to individuals, a formal Data Protection Impact Assessment (DPIA) will be carried out and reviewed by the Data Protection Officer and if appropriate by the Skillbase Board prior to proceeding with the project.

Third party suppliers

Third party suppliers to Skillbase such as IT, Accountancy and specialist service providers are required to have appropriate Data Protection Policies and Practices, which are evaluated when arrangements are set up and reference to those Policies and Practices is included as appropriate in contractual documents.

Subject Access Requests

Subject Access Requests should be addressed in writing (electronic or paper) to the Designated Board member who has designated responsibility for compliance with data protection - Jennie Shannon. Any request must be clearly marked as a Subject Access Request. See contact details below.

Subject Access requests will be responded to within one month. If a Subject Access request is considered to be manifestly unfounded or excessive, it will be refused and the reason explained in writing within one month. In such a case the person making the request will have the right to complain to the supervisory authority and to a judicial remedy.

Privacy notices

The Skillbase employment contracts and associate agreements contain privacy notices.

Consent

We don't currently collect any data by consent as all purposes are lawful based on explicit need. For example, we consider the collection of psychometric data, feedback on courses and contact details of course delegates as being in the legitimate interests of the employer or a third party and therefore do not require consent for these activities.

If at any time we carry out activity which requires consent for use of data, e.g. a marketing survey or a highly specific workforce analysis, a request for consent will be included as a step in the process and will conform with the GDPR requirement for consent to be "freely given, informed, specific and explicit".

Data Breaches

In the case of a personal data breach, the person who identifies it, should report it immediately to the DPO and be prepared to support the investigation and resolution of a breach.

The Board, on the advice of the DPO, decides whether or not:

1. The Information Commissioner's Office (ICO) should be informed, which is necessary in the event that it is likely to *result in a risk to the rights and freedoms of individuals,* e.g. it could result in discrimination, damage to reputation, financial loss, loss of confidentiality.
2. Those directly concerned should be informed, which is necessary in the event that the breach may *result in a high risk to the rights and freedoms of individuals*.

International

Skillbase operations are conducted from the UK and whilst delivered internationally, fall under the UK supervisory authority.

Children

Skillbase does not provide services or engage with people under the age of 18 and therefore this policy has no special provisions for children.

Contact Information

Skillbase People Development Ltd., Unit 22 Broadmarsh Business Centre, Harts Farm Way, Havant, Hants, PO9 1HS

Data Protection Officer - Jennie.shannon@skillbase.com