



SkillsReach General Data Protection and Document Retention Policy

Introduction

SkillsReach is a business with a real passion for supporting business and local economies to succeed through best investment in Skills, HR and Business Development. Professionalism and respect are instilled as core values and we are fully committed to the principles and practices of the General Data Protection Regulation (May 2018).

SkillsReach needs to gather and use certain information about individuals from time to time. This can include clients, associates, suppliers and employees with whom we have a relationship. This policy describes how this data must be collected, handled and stored to meet our data protection standards and comply with the law. The policy ensures:

- Compliance with data protection law and good practice
- Protection of the rights of individuals we work with
- Openness about storage and processing of individuals' data
- Protection against the risks of a data breach

This policy helps to protect SkillsReach from very real data security risks, including:

- Breaches of confidentiality
- Failing to offer choice to individuals about use of their personal data
- Reputational damage

Responsibilities:

SkillsReach Ltd as a body corporate is the Data Controller under the General Data Protection Regulation Policy with the Managing Director also acting as SkillsReach General Data Protection Regulation Officer. The SkillsReach Leadership team is ultimately responsible for ensuring that legal obligations are met. Everyone who works for or with SkillsReach has responsibility for ensuring data is collected, stored and handled appropriately.

The policy applies equally to:

1. Employees
2. Contractors, suppliers and other people working on behalf of SkillsReach

It applies to all data the company holds relating to identifiable individuals even where this technically falls outside of the remit of the General Data Protection Regulation. This applies across the board, but specifically to the ESF project, Employees Support in Skills 24-005 (ESF-2150 ITT-30117 Investment Priority: 2.1 Sector Skills Plans) to develop sector skills plans in New Anglia and our partnership with Bishop Grosseteste University (BGU) in Greater Lincolnshire for Specialist Skills Advisory services.



This can include:

- Names of Individuals
- Postal Addresses
- Email Addresses
- Telephone Numbers
- Any information relating to individuals

Staff/Associates are required to abide by the requirements / contents of the Policy and failure to do so may result in disciplinary action. This Policy will be continually monitored and updated, particularly when changes in the scale and nature of our operations occur. Any queries or concerns should also be raised with the Managing Director who encourages staff/associates to suggest ways of strengthening, redefining, or amending this policy to bring about improvements.

Data Protection Legislation:

The General Data Protection Regulation (2018) describes how organisations must collect, handle and store personal information. These rules apply whether data is stored electronically, on paper or on other materials. Personal information must be collected and used fairly, stored safely and not disclosed unlawfully. There are eight important principles underpinning the legislation setting out that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up-to-date
5. Not be held for longer than necessary
6. Be processed in accordance with the rights of data subjects
7. Be secure
8. Not be transferred outside the European Economic Area unless that country ensures an adequate level of protection

1. Data Protection General Guidelines:

- The only people able to access data covered by this policy should be those who need it for their work
- Information about an individual's physical or mental health or condition; sexual life; religious views; ethnicity or race; or other protected characteristics as listed in the Equality Act 2010 is sensitive and can only be collected and processed with express consent
- Data should not be shared informally, or with unauthorised people internally or externally
- SkillsReach will provide information and briefing to staff / associates to support their implementation of this policy
- All data should be kept secure through sensible precautions
- Strong passwords should be used, never shared and changed every 90 days



- Data should be regularly reviewed for relevance and if no longer required, it should be deleted and disposed of
- Staff and associates should request support through the Managing Director if they are unsure about any aspect of data protection

Data Storage: (See also ‘Document Retention and Disposal’ section in this policy)

- Data stored on paper should be kept in a secure place where unauthorised people cannot see it
- When not required, paper and printouts should not be left where unauthorised people can see them
- Data printouts containing personal or business data should be shredded and disposed of securely when no longer required
- Electronic data must be protected from unauthorised access, accidental deletion and malicious hacking attempts
- Electronic data should be protected by strong, confidential passwords that are changed regularly
- Data stored on removable media (e.g. memory stick, CD) should also be kept locked securely when not in use
- Data should only be stored on designated drives / servers
- Data should be backed up frequently
- Data should never be saved directly to mobile devices such as smart phones
- All IT equipment containing data should be protected by approved security software

Data Use-age:

- Employers should ensure, when working with personal data, that the screens of their computers are always locked when unattended
- Personal data should not be shared informally (e.g. through email)
- Personal data should not be transferred outside the European Economic Area, unless the country offers adequate levels of protection.
- Personal data should not be saved to personal computers

Data Accuracy:

- Employees / Associates are responsible to take reasonable steps to ensure data is as accurate and up-to-date as possible
- Data should be held in as few places as necessary
- Employees/Associates should take every opportunity to ensure data is updated immediately when inaccuracies are discovered



Subject Access Requests:

A subject access request is where an individual contacts the company requesting data protection information. All individuals who have personal data held by SkillsReach have the right to:

- Ask what information is held about them and why
- Ask how to gain access to it
- Be informed how to keep it up-to-date
- Be informed how SkillsReach meets its data protection obligations

Subject access requests should be made by email, addressed to the Data Controller (Managing Director) at roy.harper@skillsreach.co.uk. The Data Controller will always verify the identity of anyone making a subject access request before handing over information and aim to provide the relevant data within 14 days of receiving the request.

Other Data Disclosure:

In certain circumstances, legislation allows personal data to be disclosed by law enforcement agencies without the prior consent of the data subject. In responding to such requests, the Data Controller will ensure that the request is legitimate, taking advice where necessary.

2. Document Retention and Disposal

Personal data processed for any purpose must not be retained for longer than is necessary with regular management reviews to decide whether a document (or set of documents including electronic versions) should be:

1. Retained
2. Disposed of

Retention/Disposal protocols

The following considerations should be taken into account:

- Has retention or disposal been properly considered?
- Is retention required to fulfil statutory or other legislative requirements?
- Is retention required to fulfil contractual, funder or audit requirements (e.g. European Funding)?
- Is retention required to evidence events in the case of a dispute?
- Is retention required to meet the operational business needs of SkillsReach?
- Is retention required because the document is valuable?



Where a retention period has expired for a particular document, another review should be carried out before a final disposal decision is made.

Retention of Documents

Documents will either be retained in the SkillsReach office filing cabinets that should be locked at all times, or alternatively in archive boxes held securely away from the office and accessible within 3 working days. Archive boxes should clearly state the date that documents should be retained to, and the reason for that retention period.

For European funded projects, the following records must be retained as a minimum until 6 years* after the final payments have been made by the EU Commission:

- Original invoices
- Delivery evidence
- Management information returns
- Any other documents necessary to verify the service.

(*The 2014 – 2020 ESF programme documents will need retaining until at least December 31 2030)

Disposal of documents

Under no circumstances should paper documents or removable media (e.g. CD/DVD/memory sticks) containing personal data or confidential information be simply 'binned' or deposited in general refuse. To do so could result in unauthorized disclosure under Data Protection legislation. All such confidential documents should be destroyed on site through shredding.

If electronic data is dealt with so it is virtually impossible to retrieve, then this will be regarded as equivalent to deletion. Wherever practicable, disposal should involve further recycling in line with the SkillsReach commitment to sustainable business.

3. Website Data Protection and Privacy:

We want visitors to our website to know that we are just as concerned as you are about the privacy of any personal information that you may choose to provide to us. "Personal Information" is any information about you and may include your name and address, date of birth and any other information you may wish to provide.

Accordingly, we want not only to advise you of your privacy rights but also explain how we intend to respect them in respect of our main website www.skillsreach.co.uk and any other websites that we may operate from time to time.

How is your Personal Information collected by our website?

Personal Information may be submitted on our website (SSL-encrypted) as follows:



If you provide your name and address on the public area of this website in order to request information about our products and services, you may voluntarily provide additional personal information. You will be asked to provide your Personal Information in this area for the purposes of registering with us.

To ensure a good quality of service, we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. We recommend that you do not routinely send us Personal Information by e-mail, unless otherwise agreed.

How we use Cookies on our Website and the information we collect:

For more information about cookies please refer to www.allaboutcookies.org

Session Cookies:

We use session cookies for the following purposes:

- To allow you to carry information across pages of our site and avoid having to re-enter information.
- Within registration to allow you to access stored information.
- Non personal data for tagging purposes only (by random number)

Persistent Cookies:

We use persistent cookies for the following purposes:

- To help recognise you as a unique visitor when you return to our website and to allow us to tailor content to match your preferred interests.
- To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website.
- To internally identify you by account name, name, email address, customer ID and location (geographic and computer ID/IP address)
- To differentiate users who are on the same network.
- Within research surveys to ensure you are not invited to complete a questionnaire too often or after you have already done so.

Use of Web Beacons:

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides.



Disabling/Enabling Cookies:

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

To find out how to enable/disable cookies see www.allaboutcookies.org.

How will your Personal Information be used?

We will process your Personal Information to administer your account, maintain our accounts and records, monitor website usage levels and the quality of the service we provide, and to inform you, (from time to time), about any of our products and services that we consider may interest you. We will not sell or give any other party these details, unless required to do so by the police or other UK law enforcement services. In accordance with our Website Terms and Conditions, we reserve the right to alter the purposes for which we process your Personal Information. In the event that we consider it appropriate to make any such change, you will be notified as soon as practicable. All rights in the manner of recording your Personal Information held by ourselves (including copyright and database rights) are and shall remain our property.

Consent via Website:

By providing Personal Information and registering with us or logging on with us when you enter our website, you explicitly consent to our processing and disclosing your Personal Information for the purposes, and otherwise in the manner, set out on this page, or as otherwise provided in accordance with the Terms and Conditions. If you wish to qualify, vary, modify or limit your consent in any way then please notify us. Our contact details are located in the "Contact Us" pages of our website.

Endorsed by: Roy Harper – Managing Director - SkillsReach

Signature: 

Date: 19.11.2018