


# Privacy Policy

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Approved and signed off by:

<b>Name:</b>	<b>Michael Winship</b>
<b>Position:</b>	<b>Managing Director</b>
<b>Date:</b>	<b>August 2024</b> (next review August 2025, unless required sooner)
<b>Signature:</b>	



## **Purpose**

We are committed to protecting the privacy and security of your personal information.

Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

## **Who we are**

Skills North East Limited (SNE) collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [UK General Data Protection Regulation](#) which applies to the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

## **The personal information we collect and use**

### **Information collected by us**

In the course of delivering training packages to existing employees and our learners, depending on our relationship, we may collect the following personal information about you:

- your name, address, telephone numbers, e-mail address and other contact information.
- date of birth and gender;
- marital status and dependants;
- next of kin and emergency contact information;
- information to enable us to check and verify your identity;
- your Unique Learner Number;
- government identification numbers, such as your National Insurance number;
- recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter);
- your employment history, qualifications and courses attended;
- employment performance information;
- disciplinary and grievance information;
- photographs;
- your contact history and details of services provided to, or received from, you;
- information about how you use our website, IT, communication and other systems – we use cookies on our website (for more information please refer to the section of Cookies at the end of this Policy);
- your responses to surveys;
- your personal or professional interests; and
- your professional online presence, eg LinkedIn profile.

### **Special category personal data collected by us**

We may also collect, store and use the following more sensitive categories of personal information:

- information about your race or ethnicity, religious or similar beliefs, sexual orientation, political opinions, and trade union membership;
- information about your physical and mental health, and disability status; and
- information about criminal convictions and offences.

### **How your personal information is collected**

We will collect some of the above information from you in person, by telephone, text or email and/or via our website.

We may also obtain personal information from other sources as follows:

- Department for Education (“**DfE**”);
- Learning Record Service (“**LRS**”);
- Department for Work and Pensions (“**DWP**”);
- your employer;
- education providers you have previously provided information to; and
- company websites and Companies House.

### **How we use your personal information**

Under data protection law, we can only use your personal information if we have a lawful basis for doing so, eg:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

We use your personal information:

- to deliver training packages to existing employees and to learners a range of government funded contracts.
- to administer our relationship with you, send you on training courses and keep a record of courses you have attended.
- to report to government bodies and funding bodies including the DfE and LRS;
- to gather and provide information required by or relating to audits, enquiries or investigations by regulatory bodies including external audits and quality checks;
- to promote our services;

- to analyse and improve our services and communications and to ensure business policies are adhered to;
- for insurance purposes;
- to exercise or defend our legal rights, or to comply with court orders;
- for statistical analysis to help us manage our practice e.g. in relation to our financial performance, client base, or other efficiency measures;
- to communicate with you to keep you up-to-date on the latest developments, announcements, and other information about our, events and initiatives;
- to send you details of surveys and marketing campaigns; and
- to collect information about your marketing preferences to personalise and improve the quality of our communications with you.

### **How we use your special category personal data**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for processing this type of personal information. We have in place appropriate safeguards, which we are required by law to maintain when processing such personal data. We may process your special categories of personal information in the following circumstances:

- With your explicit written consent.
- Where it is needed in the public interest.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure that appropriate adjustments can be made on the training courses we deliver or arrange.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **Information about other people**

Should you provide information to us about any person other than yourself, such as your employees, your suppliers, or your counterparties you must ensure that such third parties have been informed and understand how their personal data will be used and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

### **Who we share your personal information with**

In the course of providing services to you, we may share your personal data with the following:

- Department for Education ("DfE");
- Learning Record Service ("LRS");
- Department for Work and Pensions ("DWP");

- your employer;
- professional advisers whom we instruct on your behalf or to whom we refer you or from whom you have been referred to us e.g. counsel, medical professionals, accountants, tax advisors, agents or other experts;
- local and national law enforcement officials and the Court;
- our insurers and brokers;
- external auditors and regulatory bodies;
- our funders; and
- external service suppliers, representatives and agents that we use to make our business more efficient including providers of IT services, offsite storage of computer data, maintenance of office machines, telephone and call recording services, photocopying, storage of completed files and shredding of confidential documents.

We only allow our service providers to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

#### **How long your personal information will be kept**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. We will keep your personal data after we have finished advising or acting for you. We will do so for one of these reasons:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly; and/or
- for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you want to learn more about our specific retention periods for your personal data established in our retention policy you may contact us at [hello@sne.org.uk](mailto:hello@sne.org.uk)

When it is no longer necessary to retain your personal data, we will securely delete or anonymise it.

#### **Promotional communications**

We may use your personal information to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in processing your personal information for promotional purposes (see above '**How and why we use your personal information**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organisations for marketing purposes.



You have the right to opt out of receiving promotional communications or update your marketing preferences at any time by:

- contacting us at [hello@sne.org.uk](mailto:hello@sne.org.uk)
- using the 'unsubscribe' link in emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

### Your rights

Under the [UK General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing; —in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

If you would like to exercise any of those rights, please:

- email, call or write to us;
- let us have enough information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

- let us know the information to which your request relates.

### **Right to withdraw consent**

If you have provided your consent to the processing of your personal data, you have the right to withdraw your consent. If you wish to do so, please contact us or “unsubscribe” to any marketing e-mail we send to you, where relevant.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Withdrawal of consent to receive marketing communications will not affect the processing of personal data for the provision of our legal services.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access 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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

### **Updating your personal information**

We are committed to maintaining the accuracy of the personal data we process. If any of the personal data that you have provided to us changes or if you become aware that we are processing inaccurate personal data about you, please get in touch. We will not be responsible for any losses arising from any inaccurate or incomplete personal data provided to us by you.

### **How to complain**

We hope that we can resolve any query or concern you raise about our use of your information.

The [UK General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

### **Changes to this privacy notice**

This privacy notice was published on 16<sup>th</sup> July 2018. Last review date: 29<sup>th</sup> August 2024.

We may change this privacy notice from time to time.

### **Cookies**

A cookie is a small piece of data that websites store on your computer. Some cookies only exist whilst you remain on the site and are erased when you close your browser; these are known as session cookies. Others remain on your machine between sessions allowing us to recognise you when you return to the site; these are known as persistent cookies.



### **Session Cookies**

We use these to improve your user experience. For example, a cookie is stored when a form has been submitted but contains errors. The correct information submitted is stored temporarily so that the user does not have to repeat themselves.

### **Persistent Cookies**

We use these to remember who you are. For example, we store a cookie allowing us to automatically log you in on your return. We also like to keep track of how many different individuals are visiting our site each day; again this requires a cookie to be stored on each user's machine.

You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **How to contact us**

Please contact us if you have any questions about this privacy notice or the information that we hold about you.

If you wish to contact us, please send an email [hello@sne.org.uk](mailto:hello@sne.org.uk), write to Data Manager, Skills North East, Skills House, Unit 6 Apex Business Village, Annitsford, Northumberland NE23 7BF or call 0191 250 4590.