

# Privacy Policy



**Authorised and signed on behalf of Skillnet LTD**

A handwritten signature in blue ink, appearing to read 'Chris Kenny'.

Chris Kenny  
Engineering Director

**Approved: June 2024**  
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**Author: Engineering Director**  
**Owner: Engineering Director**

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# Policy Statement

Privacy policy for applicants, apprentices, and customers

This is the privacy policy of Skillnet Limited, a company registered in England and Wales under number 04559473 whose registered office address is c/o Hillier Hopkins LLP, First Floor Radius House, 51 Clarendon Road, Watford, Herts, WD17 1HP ("we", "us" or "our").

We are committed to protecting and respecting your privacy. This policy describes what personal data we collect from you and how we process your personal data.

We are registered as a data controller with the Information Commissioner's Office.

Our nominated data protection officer is Richard Wilman (Finance Director).

You are under no obligation to provide us with personal information, but if you do not wish to disclose such information to us, we may be unable to provide you with our services or be restricted in the services we can provide you.

Specifically, if you are a candidate, your personal information will be necessary to assess and progress your employment and training opportunities, and prospective employers may be unable to proceed with your application without sufficient information about you.

## Information we may collect from you

Whether you are a candidate looking to find an apprenticeship or an employer organisation looking to hire an apprentice, we may collect personal information from you via online or offline communication methods.

Personal information may be collected from you when you visit our website (<https://www.skillnet.training>) or the websites we host on behalf of employer organisations (<https://www.ford-apprenticeships.co.uk> and <https://www.daf-apprenticeships.co.uk> (together "the websites").

### 1. If you are a candidate

We may collect personal information when you register your details online via the websites, upload your CV or email or call one of our consultants. The information we collect may include your name, address, email address, telephone number, personal description, photograph, ethnicity, date of birth, national insurance number, unique learner number, special educational or other needs, college details, disability information, qualifications, place of work, employment history, education history, additional CV information, references, and criminal convictions. We may also collect information about your preferences for further communications (for example, about courses, learning opportunities, surveys, and research).

We may also collect information from third-party sources, for example, we may obtain your unique learner number from government websites.

## **2. If you are an apprentice**

If you commence a training programme with any of the employer organisations we work with, we may also collect additional personal information about you, either directly from you or via your employer, namely learner information (such as the content of commitment statements and individual learning plans (ILP), progress reports and college reports) and information about you for the purposes of attending college (such as any travel and hotel accommodation arrangements you make in order to attend the college and your dietary requirements).

If you are a DAF apprentice, we will also obtain a photo of you from DAF.

We may also collect personal information about you from the college you attend, namely your college's process reviews, attendance registers, safeguarding information, travel information, and your annual leave.

## **3. If you work for an employer organisation**

If you work for any of the employer organisations we work with, we may collect personal information from you, for example, when you contact our consultants by telephone, email, fax, or by an exchange of physical documents. This will ordinarily be limited to your business contact information, such as your name, email address, postal address, telephone number, and unique identifiers.

## **4. If you visit our website**

We also automatically gather collective information and statistics about visits to the websites such as IP addresses, GUIDs, login information, browser type, traffic data, location data, weblogs, communication data, and resources accessed, but we only enable us to use such data in aggregate form, that is, as a statistical measure, but not in a manner that would identify you personally.

## **Cookies and links to other websites**

The websites use cookies to distinguish you from other users of the websites. This helps to provide you with a good experience when you browse the websites and also allows us to improve them. For detailed information on the cookies we use and the purposes for which we use them, please see our Cookie Policy on the Skillnet website (<https://www.skillnet.training/cookies-statement>) or on the other websites we host (<https://www.ford-apprenticeships.co.uk/cookies-statement>) and (<https://www.daf-apprenticeships.co.uk/cookies-statement>).

The websites may contain links to other sites. Please note that we are not responsible for the privacy policies of these other sites. When you leave our website, we encourage you to read each site's privacy policy that you visit, which collects personally identifiable information.

## **Special categories of personal data**

If you are a candidate, it is not our policy to seek special category personal data (previously known as "sensitive personal data"), for example, information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, data concerning your physical or mental health.

However, as indicated above, we do invite you to provide us with information about your special educational or other needs (which may include information about your physical and/or mental health), and we suggest that you do not offer any other "special category" information to us unless we specifically ask you to do so.

We use information about your physical and/or mental health so that your needs may be adequately taken into account when considering your application. We use information about your ethnicity to report to the Education and Skills Funding Agency (ESFA) so that they can calculate statistics on demographics.

## **Information about criminal convictions**

If you provide us with information about any criminal convictions, we shall use it only in accordance with the laws governing the use of such information.

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

We will use the personal information we have collected to facilitate the recruitment and training services we provide.

### **1. If you are a candidate**

If you are a candidate, we may use your personal information for the following purposes on the basis that you have consented to us doing so:

Matching your details with job vacancies to help us find the position that suits you best.

Contacting you by telephone, email, SMS, or post to alert you to suitable vacancies, and co-ordinating interview arrangements and job offers.

Shortlisting and selecting you to be put forward for a particular opportunity.

Supplying your details to prospective employers for the recruitment process.

Obtaining references from your named referees.

We may also use such information for internal administration and reporting on the basis that this is compatible with the primary purposes.

## **2. If you are an apprentice**

If you are an apprentice, we may use your personal information to provide our services to your employer, including managing, administering, and assessing your training and dealing with its funding. We do so on the basis of our contractual obligations to your employer and our legal obligations to you.

We may also use such information for internal administration and reporting on the basis that this is compatible with the primary purposes.

## **3. If you work for an employer organisation**

If you work for an employer organisation, we may use your personal information to provide our services on the basis that we have a legitimate interest in doing so and in order to comply with our contractual obligations to the organisation you work for.

We may also use such information for internal administration and reporting on the basis that this is compatible with the primary purposes.

## **4. If you visit our website**

If you visit our website (whether you are a candidate, work for an employer organisation, or are a casual browser), the information we collect from your use may be used for the following purposes and on the basis that we have a legitimate business interest in doing so:

Administering and improving the websites to ensure the content is presented most effectively for you and for your device.

Keeping you updated about our new services, events, and opportunities.

Collecting publicly available information which may be reused in the operation and development of our business.

Tailoring the information on the websites so that it is relevant to you, such as assessing which of our services and areas of the websites are used most frequently.

Compiling industry, employment, and marketing statistics, surveys, and equality of opportunity data.

Keeping data accurate and up to date

Whilst we will try to ensure that your personal information is maintained and up to date, please inform us if you become aware of any inaccuracies.

## **When we may disclose your personal information**

We may disclose your personal information in the following circumstances and on the basis that we have a legal obligation or a legitimate interest to do so:

If we are under a duty to disclose or share it in order to comply with any legal obligation (for example, with funding authorities, our auditors, our insurers, and HMRC).

We may release your personal information to any member of our group.

If we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets.

If a third party acquires us or substantially all of our assets, personal information we hold about you will be one of the transferred assets.

If you are a candidate, we may share your personal information with prospective employers and client companies or their business partners, or any member of an employer or client's group, which means their subsidiaries, their ultimate holding company, and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006 ("group") on the basis that you have consented to us doing so. We cannot guarantee to candidates that all prospective employers adopt a similarly confidential approach to your personal information.

If you are an apprentice we will share personal data with the college you attend, namely your name, date of birth, the start and end dates of your training, Additional Learning Support, information about any travel and hotel accommodation arrangements we make in order for you to attend college, dietary requirements, next-of-kin, your previous qualifications (in mathematics, English and IT), details about your employment, your employer and your annual leave, your ILP, and Initial Assessment results and your education/support plan.

If you are a DAF apprentice, we will also share the photo supplied to us by DAF with the college you attend.

With your consent, we may also provide the college you attend with information about your physical and/or mental health.

## **How we store and manage your personal information**

All the personal information we obtain from you is held on our secure databases and sometimes in our manual systems.

Where we have given you (or you have chosen) a password that enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask that you do not share a password with anyone.

The data we collect from you may be transferred to and stored at, a destination in the European Economic Area ("EEA"). It may also be processed by staff

operating outside the EEA who work for one of our suppliers or us. By submitting your personal information, you agree to this transferring, storing, or processing.

Unfortunately, the transmission of information via the Internet is not completely secure. While we will do our best to protect your personal information, we cannot guarantee the security of any data transmitted to us via our website, email, or mobile devices.

## How long do we keep your personal data?

We will only keep your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

The table below sets out further details:

Circumstances in which personal data was provided	How long do we keep it?
If you are a candidate	2 years
If you are an apprentice	7 years (or longer if required by the ESFA/ESF)
If you work for an employer organisation	7 years
If you visit our website	2 years

## Your rights in relation to the personal data we hold

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request.

Object to processing your personal data where we are relying on a legitimate interest (or those of a third party), and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object to where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, overriding your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful, but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



## Contacting us

If you would like to communicate with us about any of the rights mentioned above, or if you have any other queries about the matters mentioned in this privacy policy, please contact us using one of the following options:

Email: [info@skillnet.training](mailto:info@skillnet.training)

Post: Unit 4, Woodshots Meadows, Croxley Green Business Park, Watford, WD18 8YS

## Complaints

You have the right to complain to the Information Commissioner about the way in which we collect and use your personal information: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or telephone 0303 123 1113.

## Changes to this privacy policy

This policy is effective from 09<sup>th</sup> March 2022. We may change this privacy policy from time to time by updating this policy. As standard this policy will be reviewed at least annually.

<b>TRACKING and REFERENCE INFORMATION</b>
<b>Date Approved: 26<sup>th</sup> June 2024</b>
<b>Review Date: 26<sup>th</sup> June 2025</b>
<b>Author/Responsibility: Quality and Innovation Director</b>
<b>Owner: Engineering Director</b>
<b>Version: 5.0</b>
<b>Storage location: 'S' Drive / Quality / Policies and Procedure</b>
<b>List of related policies, procedures, and other documents:</b>
<b>Complaints:</b> If you wish to submit a complaint about the application of this policy or the procedure of it, please send your request in accordance with the appeals procedure to <a href="mailto:Rebecca.sparshott@skillnet.org.uk">Rebecca.sparshott@skillnet.org.uk</a>
<b>Monitoring:</b> The application of this policy and associated procedure will be monitored by the Director of Audit and Compliance and the Quality and Innovation Director
<b>Easy reading:</b> To receive this policy/procedure in a different format, please contact: <a href="mailto:programme.support@skillnet.org.uk">programme.support@skillnet.org.uk</a>