Privacy Policy 2026/2027

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Approved by	Jamie Crinigan
Position	Managing Director
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Signed	S.Wain
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Version	2

Introduction

Skills4 is committed to ensuring that your personal information is used lawfully, fairly and transparently and is kept securely. This Privacy Policy explains how we collect, use, retain and share your personal information and how you can exercise your rights.

This policy applies to prospective, current and former learners, employer contacts, website visitors and people who contact us. Separate privacy information covers recruitment and employment.

We comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, as amended, including by the Data (Use and Access) Act 2025.

Data Controller

Any personal information covered by this policy is controlled by I & F Limited, trading as Skills4 Group and Skills4. Our company number is 05166983 and our Information Commissioner's Office (ICO) registration reference is ZA097176.

If you have questions about your personal information, wish to exercise your rights or want to make a data protection complaint, please contact:

Data Protection Contact: Si Ung (Data & AI Director)

Email: info@skills4group.co.uk

Telephone: 0161 794 0528

Address: Oak House, Ground Floor, 28 Sceptre Way, Bamber Bridge, Walton Summit Centre, Preston PR5 6AW.

Collection Of Your Personal Data

We collect personal information when you visit our websites, make an enquiry, apply for or enrol on a course, use our learning platforms, participate in training or assessments, attend events or contact us by email, telephone, online form or letter.

Depending on your relationship with us, this may include:

- Your name, address, date of birth and contact details.
- Identity, residency and eligibility information, including your National Insurance number where required.
- Employment details, previous qualifications and learning history.

- Attendance, progress, assessment results, qualifications and learning records.
- Information about additional learning needs, disabilities, health conditions and reasonable adjustments.
- Equality monitoring information, where relevant.
- Safeguarding concerns and associated information.
- Business contact details, bookings, invoices and payment information.
- Correspondence, feedback and complaints.
- Technical information, such as your IP address, browser details and system access records.

We may also receive relevant information from employers, referral partners, other training providers, awarding and assessment organisations, funding bodies and public authorities. Business contact information may come from professional directories or your organisation's website.

Where we obtain information from another source, we provide the required privacy information within the applicable legal timescales, unless a lawful exception applies.

We identify information that is mandatory or optional when collecting it. If you do not provide information necessary for enrolment, funding eligibility or delivery of a service, we may be unable to provide that service or arrange appropriate support.

Use Of Your Personal Information

We use personal information to respond to enquiries, administer enrolment, deliver training, assess achievement, arrange learning support, communicate with learners and employers, administer funding, maintain accurate records and meet safeguarding responsibilities.

We also use relevant information to manage payments, investigate complaints, monitor quality, protect our systems, meet legal requirements and establish or defend legal claims.

We identify an appropriate lawful basis for each activity. Depending on the circumstances, this may be:

- **Contract:** where processing is necessary to enter into or perform a contract with you.
- **Legal obligation:** where processing is necessary to comply with a specific legal duty.
- **Legitimate interests:** where necessary to deliver and administer training, manage business relationships, maintain quality or protect people and systems, provided your rights and interests do not override those interests.
- **Recognised legitimate interests:** where the statutory conditions apply, including certain safeguarding activities.

- **Public task:** only where processing is necessary for a task in the public interest that is laid down by law and entrusted to us.
- **Consent:** for specific optional activities where consent is appropriate or legally required.
- **Vital interests:** where necessary to protect someone's life.

A funding agreement or contract with your employer does not, by itself, establish a legal obligation or allow us to rely on a contract with you.

Where we rely on consent, you can withdraw it at any time. This does not affect the lawfulness of processing before withdrawal.

Sensitive Personal Information

Some information, including health, disability and ethnicity information, receives additional legal protection.

We only process this information where we have both an appropriate lawful basis and an additional condition under data protection law. Depending on the activity, this may include explicit consent, a relevant substantial public interest condition, employment or social protection obligations, or legal claims.

We process criminal offence information only where authorised by law and subject to appropriate safeguards. Access to sensitive and safeguarding information is restricted to those who need it.

Sharing Of Your Personal Information

We share personal information only where necessary, proportionate and lawful. Depending on the purpose, recipients may include:

- Your employer or sponsor, to administer training and monitor attendance, progress and achievement.
- The Department for Education and relevant local or devolved funding authorities.
- Awarding organisations, assessment organisations, the Learning Records Service and delivery partners.
- Inspectors, regulators and auditors, including Ofsted.
- Local authorities, safeguarding partners, emergency services and police.
- IT, learning platform, cloud hosting and other service providers.
- Professional advisers, insurers and payment providers.
- An appropriate successor organisation where necessary for a lawful business transfer.

Service providers processing information on our behalf must act under appropriate contractual arrangements and protect it securely.

We limit the information shared with employers and other recipients to what is necessary. Sensitive support and safeguarding details are shared only where justified.

Where a referral to another training provider is proposed, we explain the relevant arrangements and lawful basis. We do not sell your personal information.

Learners on funded programmes are also provided with the applicable Department for Education, Individualised Learner Record and Learning Records Service privacy notices. These explain how those organisations use learner information independently.

International Transfers

Where personal information is transferred or made accessible outside the UK, we ensure that applicable international transfer requirements are met.

This may involve relying on UK adequacy regulations or appropriate contractual safeguards, such as the UK International Data Transfer Agreement or UK Addendum, together with the required assessment and any additional protections.

You can contact us for information about relevant transfers and safeguards, including how to obtain a copy.

Retention Of Your Personal Information

We retain personal information only for as long as necessary for the purpose for which it was collected, taking account of legal, funding, audit, safeguarding and regulatory requirements.

Retention periods vary according to the type of record and the relevant programme or activity. We may retain information longer where necessary for an ongoing investigation, legal proceedings or the establishment or defence of legal claims.

When information is no longer required, we securely delete or anonymise it. We may retain limited suppression information to ensure that marketing objections continue to be respected.

Security Of Your Personal Information

We use appropriate technical and organisational measures to protect personal information against unauthorised access, loss, alteration or disclosure.

These include appropriate access restrictions, staff training, secure handling arrangements and oversight of service providers.

Where a personal data breach occurs, we assess the risk and notify the ICO and affected individuals where required by law.

Marketing And Cookies

We distinguish necessary service communications from marketing.

We obtain consent for electronic marketing where required by law. Where another permitted arrangement applies, we ensure that its conditions are satisfied. You can stop direct marketing at any time by using the unsubscribe option or contacting us.

We use cookies and similar technologies in accordance with applicable requirements. We obtain consent before using technologies that require it and only rely on a statutory exception where all relevant conditions are met.

Our Cookie Policy explains the technologies used, their purposes, providers and duration, together with your choices.

Telephone Calls And Online Recordings

We record selected tutoring sessions for quality assurance and to improve teaching standards. We may also record selected HR calls and meetings to maintain accurate records and support the fair handling of employment matters.

Our lawful basis is our legitimate interest in maintaining training quality and managing employment matters fairly, balanced against participants' rights and interests. Where recordings contain sensitive personal information, we also identify an appropriate additional legal condition.

We inform participants before recording begins, explain its purpose and restrict access to authorised individuals.

Routine quality assurance recordings are retained for a maximum of 90 days. HR recordings are deleted once the written record has been checked and agreed, unless continued retention is necessary for an ongoing matter. Recordings needed for safeguarding concerns, complaints or legal proceedings may be retained longer, with the reason documented and retention reviewed.

Automated Decisions And Artificial Intelligence

We do not make decisions that have legal or similarly significant effects on individuals based solely on automated processing.

Where we use artificial intelligence or automated tools to support our work, decisions of this kind remain subject to meaningful human review. We assess new uses of these technologies and update our privacy information where required.

Access To Your Personal Information And Your Rights

Depending on the circumstances, you have the right to:

- Request access to your personal information.
- Have inaccurate information corrected or incomplete information completed.
- Request deletion of your information.
- Request restrictions on its use.
- Receive and transfer certain information in a portable format.
- Withdraw consent where we rely on it.
- Exercise applicable rights relating to significant automated decisions.

These rights are subject to legal conditions and exemptions. If we cannot comply with a request, we explain why and tell you how to complain.

Your right to object

You have an absolute right to object to direct marketing, including related profiling.

You can also object on grounds relating to your particular situation where we rely on legitimate interests or public task. We consider the applicable legal requirements when responding.

Please send requests to the data protection contact above. You do not need to use a particular form or legal terminology.

We normally respond without undue delay and within one calendar month. Where permitted, we may extend this by up to two further months because of the complexity or number of requests, explaining the extension within the initial month.

We request proportionate identity information only where necessary. For access requests, we carry out reasonable and proportionate searches and may pause the response period where clarification is reasonably required. We explain any applicable pause.

Requests are normally free of charge. We only charge a fee or refuse a request where the law permits this.

Data Protection Complaints

If you are concerned about how we use your personal information, please contact us using the details above. You can complain by email, telephone or post and do not need a particular form.

We acknowledge data protection complaints within 30 days, take appropriate steps to investigate, keep you informed and communicate the outcome without undue delay.

This complaints timescale is separate from the deadlines for responding to requests to exercise your rights.

You also have the right to complain to the ICO:

Website: https://ico.org.uk/make-a-complaint/

Telephone: 0303 123 1113

We encourage you to contact us first so that we can try to resolve your concern. This does not remove your right to complain to the regulator or seek a judicial remedy.

Updates

We review this Privacy Policy at least annually and sooner where relevant legislation, regulatory guidance or our processing activities change.

The next full review is due in October 2027, with an interim check in January 2027 for updated regulatory guidance.

We publish the latest version on our website and bring material changes to the attention of affected individuals where appropriate. Where required, we provide information about a new purpose before using personal information for that purpose.