

General Data Protection Regulations (GDPR) - Privacy Policy

January 2019

1. Introduction

The General Data Protection Regulations (GDPR) apply in the UK from 25th May 2018 and replace the Data Protection Act (DPA). The GDPR has many similarities to the DPA but technology has changed since 1998, and the GDPR reflects this to protect everyone's privacy and personal data in today's digital world.

As an organisation, we will need to do some things differently in the way we collect, store, use and manage personal data and all staff, centres, associated contractors and sub-contractors will need to ensure compliance.

This privacy policy sets out the ways in which we may collect and use personal information. Please read this policy carefully as it sets out who we are, how and why we collect, store, use and share personal data and your rights in relation to personal data and how to contact us should you wish to raise a concern about the way in which personal data information is used.

2. Who are we?

Vet Skill Limited is an approved Awarding Organisation known as VetSkill (**we** or **our** or **us**). Our registered address is:

Unit 1 Headland House
Chord Business Park
London Road
Godmanchester
Cambridgeshire
PE29 2BQ

Vet Skill Ltd is registered with the UK Information Commissioner's Office as a Data Controller. Its registration number is **Z2243571**.

For the purpose of GDPR, VetSkill is the 'data controller' of the personal data you provide to us or one of our approved centres.

The appointed Data Protection Officer is the Marketing and Development Director.

The Deputy Data Protection Coordinator is the Human Resources Manager for employees, workers and employed apprentices.

3. How do we collect personal information?

By submitting personal information to VetSkill, you consent to the use of that information as set out in this policy. VetSkill may collect or be provided with information in a number of ways.

- Postal – letters, completed forms, payments
- Website – completion of forms, requests for replacement certificates, payments, complaints
- System – direct from VetSkill approved centres for approval, registration, examination and certification
- Internet – entering details into search engines, forms
- Email – emails received from customers, third parties, learners

4. Why do we collect personal information?

The purposes for which personal data is collected and used by us include personnel, administrative, financial, regulatory, payroll and business development purposes. These include the following:

4.1 Business use

For compliance with our legal, regulatory and corporate governance obligations and ensuring good practice

4.2 Personnel/HR/Regulatory

For compliance in relation to the gathering and processing of information relating to identifiable individuals, such as job applicants, qualifications, training and development, health and attendance records.

5. What personal information do we collect?

VetSkill collects, stores and processes learner, centre, centre staff, consultant and contractor information in relation to the enrolment and achievement data of learners for the purposes of administering, verifying and awarding qualifications and comply with the regulators conditions of recognition.

Centres are required to have their own privacy policy in place and to ensure that all learners and staff are aware of how and when their data may be used by others.

By sending personal data via email or by other methods to VetSkill, or by adding individuals' personal data to VetSkill's systems, you must ensure that those involved understand how their information will be used, and that they have given permission for you to disclose it to us and for you to allow us and our contracted service providers, to use it.

We may collect and process the following information about you:

5.1 VetSkill Staff

When applying for a role with VetSkill we may collect and process the personal data that you submit to ensure that we comply with our regulators requirements. This may include:

- Name, address and contact details
- Financial and pay details
- Employment history
- Details of certificates and diplomas, education and skills

5.2 Consultants and Contractors

We may collect and process data that is provided by you or your organisation to us. Personal data may include:

- Learners, tutors, assessors and centre contacts relating to previous/current employment,
- Contact details
- Financial and payment details
- Details of certificates and diplomas, education and skills and CV

5.3 Centres

You may provide us with information about the main centre contacts who will administer the activities associated with VetSkill on behalf of the approved centre. These details may include:

- Names, email addresses, telephone numbers, billing information
- Information about other personnel and contacts for the centre. For example, through organisational charts, health and safety and other policies which may include personal data.

It is important that you seek permission from the centre contacts if you provide their personal data to us. We may use the centre contact's personal data for the functions described in VetSkill's Centre Agreement, which include:

- Communicating activities between the centre and the Awarding Organisation. For example, to inform the centre of course or exam results and to send certificates
- Identifying relevant people with whom we should communicate in order to organise and undertake external quality visits; and
- Communicating regulatory changes and updates, and, if permitted, marketing VetSkill's products or services
- Purchasing, and delivery and goods and products

The centre contact's details will be retained for as long as we provide a service to a centre. If centre contacts leave the organisation, it is the organisation's responsibility to inform VetSkill so that personal details and accounts can be disabled and removed.

5.4 Tutors, assessors, internal quality assurance (IQA) staff

If you are a tutor, assessor, IQA or other member of centre staff we may also receive information about you from your centre, training provider, or employer when they register to receive products and/or services from us.

Tutors, assessors and quality assurance staff may provide VetSkill with information about their experience and qualifications that confirm their ability to facilitate VetSkill qualifications. As such, VetSkill may hold personal details about a tutor, assessor and other staff including:

- Names, email addresses, telephone numbers and other contact information
- Teaching and training qualification certificates
- Proof of professional qualifications
- Employment history and training experience; and
- References

This data is required for Awarding Organisation processes in order to meet the conditions set out by our Regulators.

This data remains on VetSkill's systems for as long as the individual continues to be a tutor, assessor or IQA for VetSkill qualifications. If a tutor, assessor or IQA requires their personal data to be removed from VetSkill's systems because they are no longer fulfilling the role, they need to inform VetSkill so that relevant data can be removed from the systems.

5.5 Learners

If you are a learner, we may also receive information about you from your centre, training provider, or employer when they register to receive products and/or services from us.

A VetSkill approved Centre that you registered with, may provide us with personal data about its learners when they add learner details to courses, work-based learning awards or exams. The personal data is usually limited to the details required for us to undertake the basic functions of an

Awarding Organisation including the registration, examination and certification processes. These details will include a learner's name, date of birth, gender, photo ID and qualification.

Information processed as part of a learner's qualification, such as physical exam papers, will be held for a maximum of three years. Personal data captured as part of a quality visit (such as video evidence of training) will be used for the purpose and outcomes of the visit, and then destroyed or deleted.

In line with our regulatory requirements to deliver future services such as certificate re-prints and the confirmation of awards, this basic learner-level data will be held by VetSkill indefinitely. Learners may also contact VetSkill to request certificate replacements. In these circumstances, a record of a learner's address is taken so that the certificate can be sent. This is held on file for a maximum of three years before it is destroyed or deleted.

5.6 VetSkill Registers

If your qualification leads to a professional register held by VetSkill, then we may also hold data in relation to your registration status and Continuous Professional Development (CPD) in order to maintain the register.

VetSkill is approved to hold the following Registers:

- Suitably Qualified Persons (SQPs)
- Microchip Implanters

6. What do we use personal information for?

We may use the information for legitimate awarding organisation business and processes such as those listed below:

6.1 Business use

- Operational reasons, such as recording and processing awarding organisation's transactions for registrations, examinations and certifications
- Monitoring performance of qualifications, centres and individuals to ensure qualifications are fit for purpose
- Training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking
- Investigating complaints
- Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests
- Ensuring business policies are adhered to (such as policies covering email and internet use)
- Checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments
- Monitoring staff conduct, disciplinary matters
- Marketing our business
- Improving services

6.2 Personnel/HR/Regulatory

- Undertaking recruitment and selection procedures
- Following termination processes
- Contracting purposes
- Performance management

- Maintaining and updating training and development records
- Monitoring absence records
- Supporting individual's needs
- Processing of payments and/or salaries

6.3 Law

Where required by law, we may also process your personal data, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

6.4 Certificate Verification

VetSkill provides a certificate verification service that allows members of the public to check that a certificate presented to them is valid and has been produced by VetSkill. The personal data we provide to individuals using this service is a learner's forename and surname, certificate number and date of birth. The website address for this service is <http://verify.aptechsystem.com/vetskill/>

7. Website use – tracking and monitoring

VetSkill's Privacy Notice sets out how VetSkill collects, stores, uses and protects any information that you provide to VetSkill when you use our website. By registering with us you are consenting to VetSkill processing your personal data in accordance with this policy.

VetSkill collects information about you when you use our website in the following ways:

- Via cookies
- By completing forms
- Subscribing to newsletters
- Submitting an enquiry
- Requesting information
- Completing a survey

VetSkill is committed to ensuring that your privacy is protected. Should we ask you to provide certain information, by which you can be identified, you can be assured that it will only be used in accordance with our Privacy Notice.

We may use aggregate information and statistics for the purposes of monitoring usage of the sites in order to help us to develop our sites and services. We may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

7.1 Links from the sites

Our website may contain links to the website of our partners, Regulators, affiliates or third party organisations. When using these links please be aware that you will leave our site and that we do not have any control over that other website. We recommend that you exercise caution and look at the privacy statement applicable to the website in question before submitting any personal information.

7.1 Information submitted on forms

VetSkill employees may access information about you to maintain our records, or to help improve our service. The information we collect through enquiries or bookings forms on our website is used to respond to those enquiries or to process administration tasks within VetSkill such as:

- Sending newsletters and/or notifications if you have signed up to receive them

- To provide you with information about our products or services
- Updating our administration records

8. Where do we store data?

All data in VetSkill's systems is stored on a secure set of servers hosted by our hosting provider. The servers reside in the United Kingdom. Data is frequently backed up and stored in the provider's backup/disaster recovery facility, which is also in the UK.

This is in a secure server hosting facility with the necessary environmental, physical and technical controls in place to ensure unapproved access is prevented.

9. Who do we share personal information with?

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

At no time will any personal data held by VetSkill be passed to organisations for marketing or sales purposes

We will share personal data with law enforcement or other authorities if required by applicable law.

We may share your personal data with VetSkill contractors including: legal and other professional advisers, consultants, and professional experts; service providers contracted to us in connection with the provision of the products and services such as providers of IT services. We will ensure that there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

VetSkill will also pass learner achievement data to the organisations listed below in line with timescales specified and agreed in individual agreements with each organisation. Once this information is shared with these organisations VetSkill is no longer the data controller but does remain the authoritative source of these achievements.

9.1 Education and Skills Funding Agency (ESFA)

The information you supply will be used by the ESFA, an Executive Agency, sponsored by the Department for Education, to issue you with a Unique Learner Number (ULN), and to create your Personal Learning Record (PLR). Further details of how this information is processed and shared can be found at: <https://www.gov.uk/government/publications/lrs-privacy-notice>. VetSkill will submit learner achievement data to the PLR when the learner achievement has been verified and where a ULN has been provided by the centre. The PLR is managed by the Learning Records Service (LRS). If you want to know more about the ULN and the PLR click on the link.

9.2 The Department of Environment, Food and Rural Affairs (DEFRA)

DEFRA has overall responsibility for the Veterinary Medicines Directorate. VetSkill submits achievement data on a monthly basis to the Veterinary Medicines Directorate for the purposes of the holding and maintaining the Register for Suitably Qualified Persons (SQP's). If you wish to know more

about the data held please contact DEFRA's Data Protection Manager at: Veterinary Medicines Directorate, Woodham Lane, New Haw, Addlestone, Surrey, KT15 3LS

9.3 UCAS

UCAS is the organisation responsible for managing applications to higher education courses in the UK. Where VetSkill qualifications have UCAS tariff points, this means they are recognised as contributing to entry to university. VetSkill will report achievement of these qualifications annually to UCAS directly. If you wish to learn more about how this data is stored and protected, please view the UCAS Privacy Policy.

9.4 Regulators

The Regulators process achievement data that has been provided by VetSkill for the specific purpose of meeting their regulatory objectives. VetSkill provides qualification award data, which may be used for research and statistical purposes to enable the Regulators to fulfil their regulatory duties.

If you wish to learn more about the data collected by the Regulators, please contact:

OFQUAL

The Office of Qualifications and Examinations Regulation, regulates qualifications, examinations and assessments in England. They are located at:

Earlston Park, 53-55 Butts Road, Coventry, CV1 3BH

Contact: public.enquiries@ofqual.gov.uk

Tel: 0300 303 3344.

CCEA Regulation

The Council for Curriculum, Examinations and Assessment has responsibility for the regulation of qualifications taken in Northern Ireland. They are located at:

29 Clarendon Road, Clarendon Dock, Belfast, BT1 3BG.

Contact: info@ccea.org.uk

Tel: 02890 261200

RCVS

The Royal College of Veterinary Surgeons is a statutory Regulator responsible for the register of veterinary nurses and veterinary surgeons eligible to practice in the UK. They are based at:

Belgravia House, 62 – 64 Horseferry Road, London, SW1P 2AF.

Contact: info@rcvs.org.uk

Tel: 0207 222 2001

10. Marketing

VetSkill maintains a marketing database that contains the basic details of individuals who have consented to VetSkill sending information about new products or services to them, usually via email. Should you wish to be removed from this database at any time, please notify privacy@vetskill.com.

11. Data breach incidents

In line with our regulatory requirements, VetSkill has a set of processes for issue and incident management, including data breaches. These processes include the required notifications to be sent to the Information Commissioners Office, our Regulators and to customers.

12. Your rights

The GDPR keeps in place individuals' rights to access personal data held about them by the Awarding Organisation known as a Subject Access Request. The length of time we have to respond to them is one calendar month.

12.1 The right to be informed

You have the right to be informed if we intend to use any personal details that we hold about you for any other purpose than set out in this policy. Where VetSkill intends to use your personal data outside of this policy, it will contact you to seek your permission to do so.

12.2 The right of access

You have the right to request a copy of the personal data that we hold about you at any time by contacting us at the email or postal address given below. We will send you a subject access request form to complete and return to us. There is no charge for this service. Please ensure that you include with your request information that will enable us to verify your identity. We will respond with 30 days of the request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

12.3 The right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate, is incomplete or changes, so that we can keep your personal data up-to-date.

12.4 The right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data be erased, please contact us using the contact details provided below.

12.5 The right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, where you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

12.6 The right to data portability

In certain circumstances, you have the right to request that some of your personal data be provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is posted to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

12.7 The right to object

Each marketing email that is sent to you or where you visit our website, this will provide you with the ability to 'unsubscribe' from receiving marketing emails at any time, alternatively please contact us at privacy@vetskill.com.

13. Contact us

If you wish to know more about the personal data held by VetSkill, or contact us in relation to any of your rights set out above, please email VetSkill at privacy@vetskill.com.

14. Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint through the applicable supervisory authority or to seek a remedy through the courts. Please visit <https://ico.org.uk/concerns/> for more information on how to report a concern to the UK Information Commissioner's Office.

15. Changes to our Policy

This policy is reviewed on an annual basis to ensure that the information it provides remains accurate and meets regulatory requirements.