

# HBXL GDPR Policies and Procedures



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Renewal date	July 2025
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Approved by	Joanna Mulgrew, Skills Academy Lead
Notes	Please also refer to the HBXL Privacy Policy and HBXL Data Retention Policy.

HBXL takes the confidentiality and integrity of learner personal data incredibly seriously.

## Privacy Policy

Our processes and procedures are governed by our GDPR policy <https://hbxl.co.uk/privacy-policy/> and Data Retention Policy <https://hbxl.co.uk/data-retention-policy/> and we are registered with ICO.

## ICO Registration

House Builder XL Limited is registered with the Information Commissioner's Office under registration reference: Z5186323

HBXL Group Limited is registered with the Information Commissioner's Office under registration reference: ZA325142

## Staff Training

All staff (and subcontractors) involved with Skills Academy training, including DfE Skills Bootcamps, are required to attend GDPR training 'Introducing GDPR' and a pass received. This Introducing GDPR E-Learning course is designed especially for those front line staff and provides a clear introduction to the main elements of the GDPR, including compliance and the consequences of non-compliance. This covers;

- Data Processing
- Types of Data
- Data Subjects' Rights
- Data Breaches

All data, security, handling and processing arrangements are set out in written policies or procedures. These are updated regularly. Staff are encouraged to safely and securely delete any data no longer required.

## Systems

Firstly, only essential personnel have access to learner data, whether that be application forms, training needs analyses, declarations, Department for Education spreadsheets and other similar documentation.

Secondly learner data/ information is saved securely, remotely to Microsoft One Drive (not locally) where it is shared only with a limited number of individuals involved with the project. Access to that information is by password protected device. This provides data resilience and accessibility.

Fourthly all staff devices have up to date virus checking software installed and active.

Thirdly only one person, plus a back-up has access to the claims portal of any specific LEP or DfE.

Finally learners where communicated in email between staff members are referenced only by initials.

### [Policies relating to learners](#)

All new learners on enrolment are provided with privacy policies relevant to specifics LEP, HBXL and the Department of Education, together with details of how to complain with regard to training quality or suspected data breaches.

### [Consent](#)

New learners are provided with complete information about the course before enrolment. Informed consent to receive information and communications are either accepted or declined at enrolment and on the basis of response, this is recorded and respected.

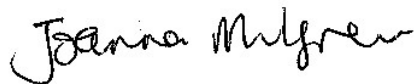
### [Insurance](#)

HBXL Group and House Builder XL Ltd have sufficient cyber insurance in place should a data breach occur.

### [Policy review](#)

This policy is reviewed annually and the next review point will be July 2025.

Signed

A handwritten signature in black ink that reads "Joanna Mulgrew". The signature is written in a cursive, flowing style.

Joanna Mulgrew

HBXL Group Ltd & House Builder XL Ltd Managing Director

Data Protection Officer