

GDPR Policies and procedures

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Approved by	Joanna Mulgrew, Managing Director and Data Protection Officer
Notes	Please also refer to Privacy Policy, Data Retention Policy, Induction Policy, Staff Handbook and IT Policy.

1. Purpose and Scope

This policy sets out how HBXL Group Ltd and House Builder XL Ltd comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It applies to:

- All staff, subcontractors, and volunteers.
- All learners, customers, suppliers, and other data subjects whose personal data we process.

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

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

2. ICO Registration

We are registered with the Information Commissioner's Office (ICO):

- House Builder XL Ltd: Z5186323
- HBXL Group Ltd: ZA325142

3. Lawful Bases for Processing

We process personal data only when there is a lawful basis, which may include:

- Consent
- Contract
- Legal obligation
- Legitimate interests
- Vital interests

Special category data (e.g., health, ethnicity) is processed only when a separate lawful basis under Article 9 applies.

4. Data Types and Purposes

We collect and process:

- Learner data: application forms, training needs analyses, DfE returns.
- Staff data: employment records, payroll, training records.

- Supplier data: contact and payment details.

All processing is limited to what is necessary for the stated purpose

5. Data Retention and Disposal

We keep personal data only as long as necessary:

- Learner and training records: 7 years after completion (DfE funding & audit requirements)
- Staff records: 6 years after leaving (Employment law limitation periods)
- Financial records: 6 years (HMRC requirement)

Data is securely deleted or destroyed when no longer needed, using certified destruction methods e.g. Secure deletion (digital) / cross-cut shredding (paper)

6. Staff Training

All staff (and subcontractors) involved with 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.

7. Data Subject Rights

All individuals have the right to:

- Access their data
- Rectify inaccurate data
- Erase data
- Restrict or object to processing
- Data portability

Requests will be responded to within one month and logged by the DPO.

8. Data Breach Response

If a data breach is suspected

- Report to the DPO immediately.
- The DPO will assess severity and, if required, notify the ICO within 72 hours.
- Affected individuals will be informed without undue delay if there is a high risk.
- A breach report will be recorded and reviewed.

9. Security Measures

- Data stored securely on Microsoft OneDrive with restricted access.
- Password-protected devices with up-to-date antivirus software.
- Data never stored locally unless authorised.
- Emails about learners use initials only.
- 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.

10. Third-Party Processors

All third parties processing data on our behalf sign a Data Processing Agreement (DPA) and meet GDPR standards.

11. International Data Transfers

If data is transferred outside the UK/EEA, it will be protected by:

- Adequacy regulations; or
- ICO-approved Standard Contractual Clauses (SCCs).

12. Privacy Notices

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

13. 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.

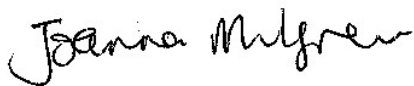
14. Insurance

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

15. Policy review

This policy will be reviewed annually, or sooner if legal or operational changes occur.

Signed



Joanna Mulgrew

HBXL Group Ltd Managing Director

Data Protection Officer