

Privacy Notice – Information, Advice and Guidance (IAG) Services in Schools

1. Who we are

The Skills and Business Hub Limited (“the Provider”, “we”, “us”, “our”) provides Information, Advice and Guidance services to schools under a contract with the relevant school. For the purposes of this privacy notice, we and the school will usually act as independent data controllers when sharing personal data for the agreed purposes set out in the contract and its data sharing schedule, unless otherwise agreed in writing.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing data protection compliance.

Contact details:

Programme Lead: Sandra Reynolds

Email: iag@skillsandbusinesshub.org

Data Protection Officer: Martine Baker

Email: privacy@skillsandbusinesshub.org

Address: MyWorkSpot Proxima, 1 Grenfell Road, Maidenhead SL6 1HN

2. The information we collect

We may collect, use and store the following personal data where it is necessary, proportionate and relevant to the delivery of Information, Advice and Guidance services in schools under the relevant school contract:

- Identity and contact details (e.g. name, email address, phone number)
- Information provided through questionnaires, surveys, registrations and feedback forms, including Microsoft Forms;
- School and learner information, including school email address, name, year group, date of birth, subjects studied, attendance, attainment, contact details, preferences, interests, skills, career aspirations, intended destinations, progression information and action plans
- Special category or sensitive information where relevant to the service, such as SEND-related information, Education, Health and Care Plan information, accessibility requirements, ethnicity, relevant medical information, safeguarding or welfare information, and eligibility or vulnerability indicators

- Records of correspondence with you
- Technical data (e.g. IP address, browser type, device information)
- Usage data (e.g. how you use our website)

3. How we collect your data

We collect data when you:

- Complete questionnaires, surveys, registrations, evaluations or feedback forms, including those hosted on Microsoft Forms;
- Your school shares accurate and up-to-date information with us where this is reasonably required to deliver the agreed IAG services, including information needed for needs analysis, caseload planning, meetings, events, safeguarding and progression support
- Contact us via email or phone
- Subscribe to communications
- Browse our website (via cookies and analytics tools)

4. Children and young people's data

Our IAG services may involve working directly with children and young people. We recognise that children's personal data requires particular care and protection. We will explain how we use personal data in clear, age-appropriate language wherever possible and will only collect information that is necessary for the service being provided.

Where appropriate, parents or carers may be involved in the service. However, children and young people also have their own data protection rights. Requests from parents, carers or pupils will be considered in line with the young person's age, understanding, best interests, safeguarding considerations and applicable data protection law.

5. How we use your information (lawful basis)

a) Consent

For example:

- Sending marketing communications
- Using non-essential cookies

You can withdraw consent at any time.

b) Legitimate interests

To:

- Assess needs and interests;

- Deliver careers, skills and business support programmes;
- Monitor participation and outcomes;
- Evaluate and improve our services;
- Produce anonymised reports and statistics for funders, partners and stakeholders.
- Respond to enquiries
- Improve our website and services
- Maintain security and performance

c) Legal obligations

Where required to comply with legal or regulatory duties.

d) Public task, contract or agreed programme delivery

Where our IAG services are delivered under a school contract, we may process personal data where this is necessary for the agreed purposes of the contract. These purposes include providing impartial careers information, advice and guidance, liaising with relevant third-party organisations such as employers, training providers, colleges and local authorities, supporting destinations or progression activity, planning and prioritising caseloads, attending relevant school meetings, and meeting applicable legal, safeguarding, Prevent, regulatory, audit and reporting requirements.

e) Safeguarding and welfare

Where necessary, we may process or share relevant information to protect a child or young person from harm, support safeguarding duties, respond to welfare concerns or comply with legal obligations.

6. Special category and sensitive information

Some information we process may require extra protection, including health information, SEND or additional needs information, EHCP-related information, ethnicity, accessibility requirements, safeguarding or welfare information, and other information that may indicate vulnerability. We will only collect this information where it is necessary for a specific purpose and where we have identified both a lawful basis under UK GDPR Article 6 and, where required, a separate condition under Article 9 and the Data Protection Act 2018.

Access to special category or sensitive information will be restricted to those who need it for the relevant purpose. We will document our reasons for processing this information and, where required, maintain an appropriate policy document and complete a Data Protection Impact Assessment before processing begins.

7. Safeguarding and welfare concerns

We do not promise confidentiality to students where information needs to be shared for child protection, safeguarding or Prevent purposes. If we identify a safeguarding concern, risk of harm or welfare concern involving a child or young person, we may share relevant personal data with the school's Designated Safeguarding Lead, local authority safeguarding services, emergency services or other relevant agencies where necessary and lawful. We will only share information that is necessary, proportionate and in the best interests of the child or young person.

8. Working with schools and partner organisations

Where personal data is shared between us and a school, the contract and its data sharing schedule set out the agreed purposes, permitted recipients, categories of shared personal data, roles and responsibilities, security requirements, breach notification expectations, retention arrangements and requirements for cooperation on data subject rights. This is separate from any wider partner arrangements, which may be covered by a Data Sharing Agreement, Data Processing Agreement or other written arrangement depending on the relationship between the parties.

Schedule 1 of the School Contract forms the Data Sharing Agreement between the School and the Provider for the sharing of personal data for the agreed IAG services.

For the school IAG contract, the Provider and the School normally share personal data as independent data controllers for the agreed purposes. We will process shared personal data only for those agreed purposes and access will be restricted to personnel who need it to meet contractual, safeguarding, legal or regulatory obligations.

Where the school provides a school email account for the Careers Adviser, communications relating to the services, including personal, sensitive or safeguarding-related information, should normally be sent through that school email account unless otherwise required by law. Where the school transfers student information to us, this should be sent securely, for example using encryption software or password-protected files.

Permitted recipients may include the school, the Provider, employees of either party who need access, subcontractors or delivery partners engaged to deliver the services, relevant employers, training providers, colleges, local authorities from which the school accepts students, safeguarding agencies and other bodies where required or permitted by law.

9. Marketing communications

We may send you updates about our services and programmes if:

- You have consented, or
- You have an existing relationship with us and have not opted out

You can unsubscribe at any time by:

We distinguish between essential service communications, programme communications and optional marketing. We will not send marketing communications to children or young people unless it is lawful, appropriate, transparent and supported by a valid consent or other applicable lawful basis. Individuals can opt out of optional marketing at any time.

- Clicking “unsubscribe” in emails
- Contacting us at privacy@skillsandbusinesshub.org

10. Sharing your information

We may share your data with:

- IT and website service providers
- Cloud storage providers
- Microsoft 365 services, including SharePoint and Forms
- Analytics providers (e.g. website usage tracking tools)
- Professional advisers where required
- Schools, colleges or education providers where necessary to deliver the IAG service, support learner participation, welfare, progression, destinations activity, meetings or agreed programme management
- Employers, training providers, colleges and local authorities where this is necessary for careers guidance, progression, destination support, agreed programme delivery or legal obligations
- Parents or carers where appropriate, lawful and in the best interests of the child or young person
- Local authorities, safeguarding agencies, emergency services or other relevant bodies where necessary for safeguarding, welfare, legal or regulatory purposes

We will ensure that all permitted recipients process personal data securely, lawfully and in accordance with UK data protection legislation and any written contractual obligations that apply to the shared personal data, including confidentiality requirements.

Where personal data is shared under the school IAG contract, the Provider and the School normally act as independent data controllers. We will consult and cooperate with the School where required in relation to privacy notices, data subject access requests, correction or deletion requests, data breaches, impact assessments, regulator enquiries and information disclosure obligations.

We only share personal data for specified and legitimate purposes and ensure that recipients:

- Access personal data only where necessary to fulfil their responsibilities;
- Are subject to appropriate contractual obligations, including confidentiality requirements;

- Maintain suitable technical and organisational security measures;
- Process personal data only for agreed purposes and in accordance with applicable data protection legislation.

11. International data transfers

Some of our service providers may process data outside the UK.

Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK adequacy decisions
- International Data Transfer Agreements (IDTAs)

12. Cookies and website tracking

We use cookies and similar technologies to:

- Ensure the website functions properly
- Analyse website traffic
- Improve user experience

You can control cookies through your browser settings and our cookie banner.

13. Data security

We take appropriate technical and organisational measures to protect your data, including:

- Secure servers and systems
- Access controls
- Staff training
- Confidentiality obligations for staff, contractors and volunteers
- Regular review of access permissions
- Data protection and information security training
- Procedures for reporting and managing personal data breaches
- Secure transfer arrangements for student information received from schools, including encrypted or password-protected files where appropriate, and use of school-provided email accounts for service-related communications where required by the contract
- Controls for Microsoft Forms and SharePoint, including named form owners, restricted access to responses, secure storage, regular access reviews and deletion or anonymisation when information is no longer required

14. How long we keep your data

We retain personal data only for as long as necessary for the purpose for which it was collected, including service delivery, safeguarding, audit, funding, reporting, complaints handling and legal or regulatory requirements. Where personal data is shared under a school contract, we may retain, return, delete or transfer shared personal data in line with the contract, the data sharing schedule, any written direction from the school as data discloser, and any legal obligation requiring retention. Typical retention periods include:

- Enquiry data: typically up to 12 months
- Marketing data: until you withdraw consent
- Technical data: in line with analytics retention settings
- IAG action plans, attendance and learner participation records: normally retained until the end of the academic year plus any additional period required for audit, evaluation, complaints or funder reporting
- Safeguarding or welfare records: retained and shared in line with safeguarding requirements, school or local authority procedures and legal obligations
- Anonymised or aggregated reporting data: may be retained for longer where individuals can no longer be identified

We securely delete or anonymise data once no longer required.

15. Your data protection rights

Under UK GDPR, you have the right to:

- Access your personal data
- Correct inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Withdraw consent at any time

Where your information has been shared with a school, local authority or other permitted recipient acting as an independent data controller, requests relating to your rights may need to be referred to or coordinated with those organisations. Where possible, we will consult the relevant school before disclosing or releasing shared personal data in response to a data subject request.

Children and young people have their own data protection rights. A parent or carer may make a request on behalf of a child where appropriate, but we may need to consider the child's age, understanding, wishes, best interests and any safeguarding risks before responding.

We may withhold information where disclosure would put a child or another person at risk, reveal another person's personal data, or otherwise be restricted by law.

To exercise your rights, contact: privacy@skillsandbusinesshub.org

16. Complaints

If you have concerns about how we handle your data, please contact our DPO in the first instance.

You also have the right to complain to the Information Commissioner's Office (ICO). Further information is available at <https://ico.org.uk/concerns/>.

17. Links to other websites

Our website may contain links to other websites.

We are not responsible for their privacy practices and encourage you to read their privacy policies.

18. Changes to this policy

We may update this policy from time to time.

The latest version will always be published on our website.

This privacy notice should be read alongside the relevant school contract and its data sharing schedule where IAG services are delivered under a school agreement.