

GDPR & Data Protection Policy

Policy Version: 1.0
Effective Date: 01/05/2025
Review Date: Annually
Approved By: Board of Trustees

1. Purpose

The Job Skills Training Association (JSTA) is committed to protecting the privacy, confidentiality and security of personal data.

This policy explains how JSTA collects, processes, stores, shares and protects personal information in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Guidance issued by the Information Commissioner's Office (ICO)

Job Skills Training Association recognises that protecting personal information is fundamental to maintaining the trust of beneficiaries, volunteers, trustees, donors, employees, partners and the wider public.

2. Scope

This policy applies to:

- Trustees
- Employees
- Volunteers
- Contractors
- Consultants
- Students
- Beneficiaries
- Members
- Donors
- Service users
- Anyone processing data on behalf of Job Skills Training Association

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Registered UK Charity: 1207351

This policy covers all personal information regardless of format including:

- Electronic records
- Paper records
- Emails
- Databases
- Cloud storage
- Mobile devices
- CCTV (where applicable)

3. Data Controller

Job Skills Training Association acts as the Data Controller for personal information processed in relation to its charitable activities.

Contact: Manash Mukherjee

Job Skills Training Association

Email: info@jobskillstraining.org.uk

Telephone: 07412470170

Website: www.jobskillstraining.org.uk

4. Definitions

Personal Data

Any information relating to an identified or identifiable person.

Examples include:

- Name
- Address
- Email
- Telephone number
- Date of birth
- Nationality
- Student ID
- Employment details

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- Financial information
- IP address
- Online identifiers

Special Category Data

Information requiring additional protection including:

- Health information
- Disability information
- Ethnic origin
- Religious beliefs
- Biometric data
- Criminal offence information (where legally permitted)

5. GDPR Principles

JSTA follows the seven principles of UK GDPR.

5.1 Lawfulness, Fairness and Transparency

Personal data is collected fairly, lawfully and transparently.

Individuals are informed about:

- Why data is collected
- How it will be used
- Who it may be shared with
- How long it will be retained
- Their legal rights

5.2 Purpose Limitation

Information is only collected for legitimate charitable, educational and operational purposes.

It will not be used for unrelated purposes without a lawful basis.

5.3 Data Minimisation

JSTA only collects information that is necessary.

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We avoid collecting excessive or unnecessary personal information.

5.4 Accuracy

Reasonable steps are taken to ensure data remains accurate and up to date.

Individuals may request corrections at any time.

5.5 Storage Limitation

Personal information is retained only for as long as necessary.

Records are securely destroyed once no longer required.

5.6 Integrity and Confidentiality

Appropriate technical and organisational measures are implemented to protect information against:

- Loss
- Theft
- Unauthorised access
- Accidental disclosure
- Cyber attacks
- Misuse

5.7 Accountability

JSTA is responsible for demonstrating compliance with UK GDPR.

All staff and volunteers receive appropriate guidance regarding data protection responsibilities.

6. Lawful Bases for Processing

JSTA processes information under one or more of the following lawful bases:

- Consent
- Contract
- Legal obligation
- Vital interests



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- Public task (where applicable)
- Legitimate interests

Examples include:

- Delivering employability programmes
- Registering participants
- Managing volunteers
- Recruiting staff
- Processing donations
- Funding applications
- Monitoring project outcomes
- Safeguarding
- Compliance with legal obligations

7. Types of Personal Data Collected

Depending on our services, JSTA may collect:

Identity Information

- Full name
- Date of birth
- Gender

Contact Information

- Address
- Telephone
- Email

Employment Information

- CV
- Qualifications
- Employment history
- Skills
- References

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Educational Information

- Academic qualifications
- Training records
- Attendance

Financial Information

- Bank details
- Donation records
- Payment history

Equality Monitoring

- Age
- Ethnicity
- Disability
- Gender
- Other demographic information (where appropriate)

Digital Information

- Website usage
- Cookies
- Device information
- IP addresses

8. Special Category Data

JSTA only processes special category data where:

- Explicit consent has been obtained; or
- Processing is required by law; or
- Processing is necessary for safeguarding or substantial public interest.

Access to this information is restricted.

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9. Children's Data

Where services involve individuals under the age of 18, JSTA takes additional safeguards to protect their information.

Parental or guardian consent will be obtained where legally required.

10. Data Sharing

JSTA does not sell personal information.

Information may be shared only where necessary with:

- Funding bodies
- Government agencies
- Educational institutions
- Employers
- Training providers
- Professional advisers
- IT service providers
- Regulatory authorities
- Law enforcement agencies (where legally required)

All third-party processors are required to comply with UK GDPR.

11. International Transfers

Where personal information is transferred outside the UK, JSTA ensures appropriate safeguards are in place including:

- UK International Data Transfer Agreement (IDTA)
- UK Addendum to EU Standard Contractual Clauses
- Adequacy Regulations
- Other lawful transfer mechanisms recognised under UK GDPR

12. Information Security

JSTA maintains appropriate security measures including:



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- Password protection
- Multi-factor authentication
- Encryption
- Secure cloud storage
- Secure backups
- Restricted access controls
- Anti-virus protection
- Firewalls
- Device security
- Secure disposal of records
- Staff confidentiality obligations

13. Data Retention

Information is retained only for legitimate business or legal purposes.

Typical retention periods include:

Training Records – 6 years

Financial Records – 6 years

Employment Records – As required by employment legislation

Volunteer Records – Up to 6 years after involvement ends

Safeguarding Records – In accordance with safeguarding guidance

Expired records are securely destroyed.

14. Individual Rights

Individuals have the following rights:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object

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- Rights relating to automated decision-making and profiling

Requests should be made in writing.

JSTA aims to respond within one calendar month.

15. Subject Access Requests

Individuals may request a copy of their personal information.

JSTA will:

- Verify identity
- Search relevant records
- Provide copies where legally required
- Respond within statutory deadlines

16. Data Breaches

Any suspected personal data breach must be reported immediately.

JSTA will:

- Investigate the incident
- Assess risks
- Contain the breach
- Record all incidents
- Notify the Information Commissioner's Office where legally required
- Notify affected individuals where there is a high risk to their rights and freedoms

17. Staff Responsibilities

All staff, trustees and volunteers must:

- Protect personal information
- Follow this policy
- Keep passwords secure
- Lock devices when unattended
- Report breaches immediately
- Complete data protection training

- Maintain confidentiality

Failure to comply may result in disciplinary action.

18. Use of Email and Electronic Communications

Staff must:

- Use secure email systems
- Verify recipients before sending
- Password-protect sensitive documents where appropriate
- Avoid sharing personal data unnecessarily
- Delete information securely when no longer required

19. Remote Working

When working remotely, individuals must:

- Use secure internet connections
- Lock devices
- Prevent unauthorised viewing of information
- Store paper records securely
- Report lost devices immediately

20. Cookies and Website

JSTA's website may use cookies for:

- Website functionality
- Security
- Performance
- Analytics
- User preferences

Where required, consent will be obtained before placing non-essential cookies.

21. Training

All trustees, staff and volunteers will receive regular training on:

- UK GDPR
- Confidentiality
- Information security
- Cyber security awareness
- Recognising data breaches

22. Monitoring

Compliance with this policy will be monitored through:

- Internal audits
- Security reviews
- Policy reviews
- Incident reporting
- Trustee oversight

23. Complaints

Individuals who believe their information has not been handled correctly should first contact Job Skills Training Association.

If concerns remain unresolved, they may complain to the Information Commissioner's Office (ICO).

24. Policy Review

This policy will be reviewed annually or sooner if:

- Legislation changes
- ICO guidance changes
- Significant organisational changes occur
- Following a serious data breach



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25. Approval

Approved by the Board of Trustees of the Job Skills Training Association.

Policy Owner: Manash Mukherjee

Board of Trustees

Version: 1.0

Review Date: 01/05/2026

Next Review Date: 01/05/2027

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