



GENERAL DATA PROTECTION REGULATION (GDPR)

Policy Statement

1. Royal Artillery Centre for Personal Development (RACPD) needs to collect personal information to effectively carry out our everyday business functions and activities and to provide the products and services defined by our business. Such data is collected from employees, learners and suppliers and includes (*but is not limited to*), name, address, email address, data of birth, service numbers, special categories of data and bank/credit card details.
2. In addition, we may be required to collect and use certain types of personal information to comply with the requirements of the law and/or regulations; however we are committed to processing all personal information in accordance with the GDPR.
3. RACPD has developed policies, procedures, controls and measures to ensure maximum and continued compliance with the data protection laws and principles, including staff training, procedure documents, audit measures and assessments. Ensuring and maintaining the security and confidentiality of personal and/or special category data is one of our top priorities.

Purpose

4. The purpose of this policy is to ensure that RACPD meets its legal, statutory and regulatory requirements under GDPR and to ensure that all personal and special category information is processed compliantly and in the individual's best interest.
5. The GDPR includes provisions that promote accountability and governance and as such RACPD has put comprehensive and effective governance measures in place to meet these provisions. The aim of such measures is to ultimately minimise the risk of breaches and uphold the protection of personal data. This policy also serves as a reference document for employees and third-parties on the responsibilities of handling and accessing personal data and data subject requests.

Scope

6. This policy applies to all staff within RACPD and sub-contractors, engaged with RACPD in the UK or Germany. Adherence to this policy is mandatory and non-compliance will lead to disciplinary action.

GDPR

7. As RACPD processes personal information regarding individuals (*data subjects*), we are obligated under the GDPR to protect such information, and to obtain, use, process, store and destroy it, only in compliance with its rules and principles.

Personal Data

8. Information protected under the GDPR is known as “*personal data*” and is defined as:

“Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.”

9. RACPD ensures that a high level of care is afforded to personal data that falls within the GDPR’s ‘special categories’ (*previously sensitive personal data*), due to the assumption that this type of information could be used in a negative or discriminatory way and is of a sensitive, personal nature to the persons it relates to.

In relation to the ‘Special categories of Personal Data’ the GDPR advises that: -

“Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation shall be prohibited – unless one of the Article 9 clauses applies.”

The GDPR Principles

10. Article 5 of the GDPR requires that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner.
- b. Collected for specified, explicit and legitimate purposes.
- c. Adequate, relevant and limited to what is necessary.
- d. Accurate and, where necessary, kept up to date.
- e. Retained only for as long is necessary.
- f. Processed in an appropriate manner to maintain security.

The Information Commissioners Office (ICO)

11. RACPD is registered with ICO and appears on the Data Protection Register as a controller and processor of personal information.

12. Our Data Protection Registration Number is Z853920X.

Objectives

13. We are committed to ensuring that all personal data controlled and processed by RACPD is done so in accordance with the data protection legislation and its principles, along with any associated regulations and/or codes of conduct laid down by the Supervisory Authority and local law. We ensure the safe, secure, ethical and transparent processing of all personal data and have stringent measures to enable data subjects to exercise their rights.

14. RACPD has developed the objectives below to meet our data protection obligations and to ensure continued compliance with the legal and regulatory requirements.

RACPD ensures that: -

- a. We protect the rights of individuals with regards to the processing of personal information.
- b. We develop, implement and maintain a GDPR policy, procedure, audit plan and training program for compliance with the data protection laws.
- c. Every practice, function and process carried out by RACPD, is monitored for compliance with the data protection laws and its principles.
- d. Personal data is only processed where we have verified and met the lawfulness of processing requirements.
- e. We only process special category data in accordance with the GDPR requirements and in compliance with the Data Protection Bill Schedule 1 conditions.
- f. We record consent at the time it is obtained and evidence such consent to the Supervisory Authority where requested.
- g. All employees are competent and knowledgeable about their GDPR obligations and are provided with training in the data protection laws, principles, regulations and how they apply to their specific role and RACPD.
- h. Individuals feel secure when providing us with personal information and know that it will be handled in accordance with their rights under the data protection laws.
- i. We maintain a continuous program of monitoring, review and improvement with regards to compliance with GDPR laws and to identify gaps and non-compliance before they become a risk, affecting mitigating actions where necessary.
- j. We monitor the Supervisory Authority, European Data Protection Board (EDPB) and any GDPR news and updates, to stay abreast of changes, notifications and additional requirements.
- k. We have robust and documented Complaints Handling and Data Breach controls for identifying, investigating, reviewing and reporting any breaches or complaints with regards to GDPR.
- l. We have a dedicated audit & monitoring programme in place to perform regular checks and assessments on how the personal data we process is obtained, used, stored and shared. The audit program is reviewed against our GDPR policies, procedures and the relevant regulations to ensure continued compliance.
- m. We store and destroy all personal information, in accordance with our retention policy and schedule which has been developed from the legal, regulatory and statutory requirements and suggested timeframes.
- n. Any information provided to an individual in relation to personal data held or used about them, will be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

- o. Employees are aware of their own rights under GDPR and are provided with the Article 13/14 information disclosures in the form of a Privacy Notice.

GOVERNANCE PROCEDURES

Accountability & Compliance

15. Due to the nature, scope, context and purposes of processing undertaken by RACPD, we carry out frequent risk assessments and information audits to identify, assess, measure and monitor the impact of such processing. We have implemented adequate and appropriate technical and organisational measures to ensure the safeguarding of personal data and compliance with the GDPR and can evidence such measures through our documentation and practices.

16. Our main governance objectives are to:

- a. Educate the Chairman, Trustees, Senior Management Team and employees about the requirements under the data protection laws and the possible impact of non-compliance.
- b. Provide a dedicated and effective data protection training programme for all employees.
- c. Identify key stakeholders to support the data protection compliance program.
- d. Allocate responsibility for data protection compliance and ensure that the designated person(s) has sufficient access, support and budget to perform the role.

Privacy by Design

17. We operate a '*Privacy by Design*' approach and ethos, with the aim of mitigating the risks associated with processing personal data through prevention via our processes, systems and activities. We have developed controls and measures that help us enforce this ethos.

Data Minimisation

18. We only ever obtain, retain, process and share the data that is essential for carrying out our services and meeting our legal obligations and only retain data for as long as is necessary.

19. Our systems, employees, processes and activities are designed to limit the collection of personal information to that which is directly relevant and necessary to accomplish the specified purpose. Data minimisation enables us to reduce data protection risks and breaches and supports our compliance with the GDPR.

20. Measures to ensure that only the necessary data is collected includes:

- a. Electronic collection – (*forms, website, surveys etc*) only have the fields that are relevant to the purpose of collection and subsequent processing. We do not include '*optional*' fields, as optional denotes that it is not necessary to obtain.

- b. Physical collection - (*face-to-face, telephone etc*) is supported using scripts and internal forms where the required data collection is ascertained using predefined fields. Again, only that which is relevant and necessary is collected.
- c. We have Service Level Agreements (SLA's) and bespoke agreements in place with third-party controllers who send us and request personal information. These state that only relevant and necessary data is to be provided as it relates to the processing activity we are carrying out.
- d. We have documented destruction procedures in place where a data subject or third-party provides us with personal information that is surplus to requirement.
- e. Forms, contact pages and any documents used to collect personal information are reviewed to ensure they are fit for purpose and only obtaining necessary personal information in relation to the legal basis being relied on and the purpose of processing.

Restriction

21. Our *Privacy by Design* approach means that we use wide restriction methods for all personal data activities. Restricting access is built into the foundation of RACPD's processes, systems and structure and ensures that only those with authorisation and/or a relevant purpose have access to personal information.

Information Audit

22. To enable RACPD to fully prepare for and comply with the GDPR, we have carried out a company-wide audit to better enable us to record, categorise and protect the personal data that we hold and process.

23. The audit has identified, categorised and recorded all personal information obtained, processed and shared by RACPD in our capacity as a controller/processor and has been compiled on a central register which includes:

- a. What personal data we hold.
- b. Where it came from.
- c. Who we share it with.
- d. Legal basis for processing it.
- e. What format(s) is it in.
- f. Who is responsible for it?
- g. Disclosures and Transfers.

Legal Basis for Processing (*Lawfulness*)

24. At the core of all personal information processing activities undertaken by RACPD, is the assurance and verification that we are complying with Article 6 of the GDPR and our lawfulness of processing obligations. Prior to carrying out any personal data processing activity, we identify and establish the legal basis for doing so and verify these against the regulation requirements to ensure we are using the most appropriate legal basis.

25. The legal basis is documented on our information audit register and in our Privacy Notice and, where applicable, is provided to the data subject and Supervisory Authority as part of our information disclosure obligations. *Data is only obtained, processed or stored when we have met the lawfulness of processing requirements, where:-*

- a. The data subject has given consent to the processing of their personal data for one or more specific purposes.
- b. Processing is necessary for the performance of the contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- c. Processing is necessary for compliance with a legal obligation to which we are subject.
- d. Processing is necessary in order to protect the vital interests of the data subject or of another natural person.
- e. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in RACPD.

Third-Party Processors

26. RACPD utilise external processors for certain processing activities (where applicable). We use information audits to identify, categorise and record all personal data that is processed outside of RACPD, so that the information, processing activity, processor and legal basis are all recorded, reviewed and easily accessible.

27. We have strict due diligence and “Know Your Customer” procedures and measures in place and review, assess and background check all processors prior to forming a business relationship. We obtain company documents, certifications, references and ensure that the processor is adequate, appropriate and effective for the task we are employing them for.

28. The continued protection of data subjects’ rights and the security of their personal information is always our top priority when choosing a processor and we understand the importance of adequate and reliable outsourcing for processing activities as well as our continued obligations under the data protection laws for data processed and handled by a third-party.

29. We draft bespoke Service Level Agreements (SLAs) and contracts with each processor as per the services provided and have a dedicated Processor Agreement template that details the processor’s data protection obligations including:

- a. Our expectations, rights and obligations.
- b. The processing duration, aims and objectives.
- c. The data subjects’ rights and safeguarding measures.
- d. The nature and purpose of the processing.
- e. The type of personal data and categories of data subjects.

30. Each of the areas specified in the contract are monitored, audited and reported on. Processors are notified that they shall not engage another processor without our prior specific authorisation and any intended changes concerning the addition or replacement of existing processors must be done in writing, in advance of any such changes being implemented.

Data Retention & Disposal

31. RACPD have defined procedures for adhering to the retention periods as set out by the relevant laws, contracts and our business requirements, as well as adhering to the GDPR requirement to only hold and process personal information for as long as is necessary. All personal data is disposed of by secure shredding facilities.

32. Please refer to our *Data Retention & Erasure Policy* on our website www.racpd.org.uk for full details on our retention, storage, periods and destruction processes.

Data Protection Impact Assessments (DPIA)

33. Individuals have an expectation that their privacy and confidentiality will be upheld and respected whilst their data is being stored and processed by RACPD. We therefore utilise several measures and tools to reduce risks and breaches for general processing. However, where processing is likely to be high risk or cause significant impact to a data subject, we utilise proportionate methods to map out and assess the impact ahead of time.

34. Where RACPD must or are considering carrying out processing that utilises new technologies, and/or where there is a likelihood that such processing could result in a risk to the rights and freedoms of data subjects, we always carry out a Data Protection Impact Assessment (DPIA) (*sometimes referred to as a Privacy Impact Assessment*).

35. Carrying out DPIAs enables us to identify the most effective way to comply with our data protection obligations and ensure the highest level of data privacy when processing. It is part of our Privacy by Design approach and allows us to assess the impact and risk before carrying out the processing, thus identifying and correcting issues at the source, reducing costs, breaches and risks.

36. The DPIA enables us to identify possible privacy solutions and mitigating actions to address the risks and reduce the impact. Solutions and suggestions are set out in the DPIA and all risks are rated to assess their likelihood and impact. The aim of solutions and mitigating actions for all risks is to ensure that the risk is either:

- Eliminated.
- Reduced.
- Accepted.

DATA SUBJECT RIGHTS PROCEDURES

Consent & the right to be informed

37. The collection of personal data is a fundamental part of the products/services offered by RACPD and we therefore have specific measures and controls in place to ensure that we comply with the conditions for consent under the GDPR.

38. The GDPR defines consent as; 'Any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her'.

39. Where processing is based on consent, RACPD have reviewed and revised all consent mechanisms to ensure that:

- a. Consent requests are transparent, using plain language and are void of any illegible terms, jargon or extensive legal terms.
- b. It is freely given, specific and informed, as well as being an unambiguous indication of the individual's wishes.
- c. Consent is always given by a statement or a clear affirmative action (*positive opt-in*) which signifies agreement to the processing of personal data.
- d. Consent mechanisms are upfront, clear, granular (*in fine detail*) and easy to use and understand.
- e. Pre-ticked, opt-in boxes are never used.
- f. Where consent is given as part of other matters (*terms & conditions, agreements, contracts*), we ensure that the consent is separate from the other matters and is not be a precondition of any service (*unless necessary for that service*).
- g. Along with our company name, we also provide details of any other third party who will use or rely on the consent.
- h. Consent is always verifiable, and we have controls in place to ensure that we can demonstrate consent in every case.
- i. We keep detailed records of consent and can evidence at a minimum:
 - (1) that the individual has consented to the use and processing of their personal data.
 - (2) that the individual has been advised of our company name and any third party using the data.
 - (3) what the individual was told at the time of consent.
 - (4) how and when consent was obtained.
- j. We have ensured that withdrawing consent is as easy, clear and straightforward as giving it and is available through multiple options, including:

- (5) Opt-out links in mailings or electronic communications.
 - (6) Opt-out process explanation and steps on website and in all written communications.
 - (7) Ability to opt-out verbally, in writing or by email.
- k. Consent withdrawal requests are processed immediately and without detriment.

Consent Controls

40. RACPD maintain rigid records of data subject consent for processing personal data and are always able to demonstrate that the data subject has consented to processing of his or her personal data where applicable. We also ensure that the withdrawal of consent is as clear, simple and transparent and is documented in all instances.

41. Where the data subject's consent is given in the context of a written declaration which also concerns other matters, the request for consent is presented in a manner which is clearly distinguishable from those matters, in an intelligible and easily accessible form, using clear and plain language. All such written declarations are reviewed and authorised by the GDPR Lead prior to being circulated.

42. Consent to obtain and process personal data is obtained by RACPD through:

- a. In Writing;
- b. By email/SMS;
- c. Electronically; (i.e. via website form).

43. Any electronic methods of gaining consent are regularly reviewed and tested to ensure that a compliant Privacy Notice is accessible and displayed and that consent is clear, granular and utilises a demonstrable opt-in mechanism.

44. Electronic consent is always by a non-ticked, opt-in action, enabling the individual to provide consent after the below information has been provided. This is then followed up with an email, SMS or written confirmation of the consent to process, store and share the personal information.

45. Privacy Notices are used in all forms of consent and personal data collection, to ensure that we are compliant in disclosing the information required in the data protection laws in an easy to read and accessible format.

Privacy Notice

46. RACPD defines a Privacy Notice as a document, form, webpage or pop-up that is provided to individuals at the time we collect their personal *data (or at the earliest possibility where that data is obtained indirectly)*.

47. Our Privacy Notice includes the Article 13 (*where collected directly from individual*) or 14 (*where not collected directly*) requirements and provides individuals with all the necessary and legal information about how, why and when we process their data, along with their rights and obligations.

48. We have a link to our Privacy Notice on our website www.racpd.org.uk and provide a copy of physical and digital formats upon request. The notice is the customer facing policy that provides the legal information on how we handle process and disclose personal information.

49. The notice is easily accessible, legible, jargon-free and is available in several formats, dependant on the method of data collection:

- a. Via our website;
- b. Worded in full in agreements, contracts, forms and other materials where data is collected in writing or face-to-face;
- c. In employee contracts and recruitment materials;
- d. Verbally via telephone or face-to-face;

50. With lengthy content being provided in the privacy notice and with informed consent being based on its contents, we have tested, assessed and reviewed our privacy notice to ensure usability, effectiveness and understanding.

Employee Personal Data

51. As per the GDPR guidelines, we do not use consent as a legal basis for obtaining or processing employee personal information. Our HR policies have been updated to ensure that employees are provided with the appropriate information disclosure and are aware of how we process their data and why.

52. All employees are provided with our Staff Handbook which informs them of their rights under the GDPR and how to exercise these rights and are provided with a Privacy Notice specific to the personal information we collect and process about them.

The Right of Access

53. We have ensured that appropriate measures have been taken to provide information referred to in Articles 13/14 and any communication under Articles 15 to 22 and 34 (*collectively, The Rights of Data Subjects*), in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

54. Such information is provided free of charge and is in writing, or by other means where authorised by the data subject and with prior verification as to the subject's identity.

55. Information is provided to the data subject at the earliest convenience, but at a maximum of 30 days from the date the request is received and identification verified. Where the retrieval or provision of information is particularly complex or is subject to a valid delay, the period may be extended by two further months where necessary. However, this is only done in exceptional circumstances and the data subject is kept informed in writing throughout the retrieval process of any delays or reasons for delay.

56. Where we do not comply with a request for data provision, the data subject is informed within 30 days of the reason(s) for the refusal and of their right to lodge a complaint with the Supervisory Authority.

Subject Access Request

57. Where a data subject asks us to confirm whether we hold and process personal data concerning him or her and requests access to such data; we provide them with:

- a. The purposes of the processing;
- b. The categories of personal data concerned;
- c. The recipients or categories of recipient to whom the personal data have been or will be disclosed;
- d. If the data has or will be disclosed to a third countries or international organisations and the appropriate safeguards pursuant to the transfer;
- e. Where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- f. The existence of the right to request rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- g. The right to lodge a complaint with a Supervisory Authority;
- h. Where personal data has not been collected by RACPD from the data subject, any available information as to the source and provider;

58. *Subject Access Requests (SAR)* are passed to the GDPR Lead as soon as received and a record of the request is noted. The type of personal data held about the individual is checked against our Information Audit to see what format it is held in, who else has it has been shared with and any specific timeframes for access.

59. SARs are always completed within 30-days and are provided free of charge. Where the individual makes the request by electronic means, we provide the information in a commonly used electronic format, unless an alternative format is requested.

60. Please refer to our website www.racpd.org.uk *Subject Access Request Procedures* for the guidelines on how an SAR can be made and what steps we take to ensure that access is provided under the data protection laws.

Data Portability

61. RACPD provides all personal information pertaining to the data subject to them on request and in a format that is easy to disclose and read. We ensure that we comply with the data portability rights of individuals by ensuring that all personal data is readily available and is in a structured, commonly used and machine-readable format, enabling data subjects to obtain and reuse their personal data for their own purposes across different services.

62. All requests for information to be provided to the data subject or a designated controller are done so free of charge and within 30 days of the request being received. If for any reason, we do not act in responding to a request, we provide a full, written explanation within 30 days to the data subject or the reasons for refusal and of their right to complain to the supervisory authority and to a judicial remedy.

Rectification & Erasure

Correcting Inaccurate or Incomplete Data

63. All data held and processed by RACPD is reviewed and verified as being accurate wherever possible and is always kept up to date. Where inconsistencies are identified and/or where the data subject informs us that the data we hold is inaccurate, we take every reasonable step to ensure that such inaccuracies are corrected with immediate effect.

64. The GDPR Lead is notified of the data subject's request to update personal data and is responsible for validating the information and rectifying errors where they have been notified. The information is altered as directed by the data subject, with the information audit being checked to ensure that all data relating to the subject is updated where incomplete or inaccurate. Once updated, we add an addendum or supplementary statement where applicable.

65. Where notified of inaccurate data by the data subject, we will rectify the error within 30 days and inform any third party of the rectification if we have disclosed the personal data in question to them. The data subject is informed in writing of the correction and where applicable, is provided with the details of any third-party to whom the data has been disclosed.

66. If for any reason, we are unable to act in response to a request for rectification and/or completion, we always provide a written explanation to the individual and inform them of their right to complain to the Supervisory Authority and to a judicial remedy.

The Right to Erasure

67. Also, known as '*The Right to be Forgotten*', RACPD complies fully with Article 5(e) and ensures that personal data which identifies a data subject, is not kept longer than is necessary for the purposes for which the personal data is processed.

68. All personal data obtained and processed by RACPD is categorised when assessed by the information audit and is either given an erasure date or is monitored so that it can be destroyed when no longer necessary.

69. Please refer to our Data Retention & Erasure Policy for exact procedures on erasing data.

OVERSIGHT PROCEDURES

Security & Breach Management

70. Alongside our '*Privacy by Design*' approach to protecting data, we ensure the maximum security of data that is processed, including as a priority, when it is shared, disclosed and transferred.

71. We carry out information audits to ensure that all personal data held and processed by us is accounted for and recorded, alongside risk assessments as to the scope and impact a data breach could have on data subject(s). We have implemented adequate and appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

72. Whilst every effort and measure are taken to reduce the risk of data breaches, RACPD has dedicated controls and procedures in place for such situations, along with the notifications to be made to the Supervisory Authority and data subjects (where applicable).

73. Please refer to our *Data Breach Policy & Procedures* on our website www.racpd.org.uk for specific protocols.

Audits & Monitoring

74. This policy and procedure document details the extensive controls, measures and methods used by RACPD to protect personal data, uphold the rights of data subjects, mitigate risks, minimise breaches and comply with the data protection laws and associated laws and codes of conduct. In addition to these, we also carry out regular audits and compliance monitoring processes, with a view to ensuring that the measures and controls in place to protect data subjects and their information is adequate, effective and compliant at all times.

75. The GDPR Lead has overall responsibility for assessing, testing, reviewing and improving the processes, measures and controls in place and reporting improvement action plans to the Senior Management Team where applicable.

76. All reviews, audits and ongoing monitoring processes are recorded by the GDPR Team and copies provided to Senior Management and are made readily available to the Supervisory Authority where requested.

77. The aim of internal data protection audits is to:

- a. Ensure that the appropriate policies and procedures are in place;
- b. To verify that those policies and procedures are being followed;
- c. To test the adequacy and effectiveness of the measures and controls in place;
- d. To detect breaches or potential breaches of compliance;
- e. To identify risks and assess the mitigating actions in place to minimise such risks;
- f. To recommend solutions and actions plans to Senior Management for improvements in protecting data subjects and safeguarding their personal data;
- g. To monitor compliance with the GDPR and demonstrate best practice.

Training

78. Through our strong commitment and robust controls, we ensure that all staff understand, have access to and can easily interpret the GDPR requirements and its principles and that they have ongoing training and support to ensure they have sufficient knowledge, competence and adequacy for the role.

Penalties

79. RACPD understands its obligations and responsibilities under the GDPR and recognises the severity of breaching any part of the law or Regulation. We respect the Supervisory Authority's authorisation under the legislation to impose and enforce fines and penalties on us where we fail to comply with the regulations, fail to mitigate the risks where possible and operate in a knowingly non-compliant manner.

Responsibilities

80. RACPD has appointed a GDPR Lead whose role it is to identify and mitigate any risks to the protection of personal data, to act in an advisory capacity to the business, its employees and senior management and to actively stay informed and up-to-date with all legislation and changes relating to GDPR.

81. The GDPR Lead will work in conjunction with the GDPR Team to ensure that all processes, systems and staff are operating compliantly and within the requirements of the data protection laws and its principles.

82. The GDPR Lead has overall responsibility for due diligence, privacy impact assessments, risk analysis and data transfers where personal data is involved and will also maintain adequate and effective records and management reports in accordance with the GDPR and our own internal objectives and obligations.

83. Staff who manage and process personal information will be provided with GDPR training and continuous support will be available from the GDPR Lead & team.