



Privacy notice

LPW collects and processes personal data relating those individuals who work with the organisation so that we can manage the relationship. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

What information does LPW collect?

LPW collects and processes a range of information about you. This includes:

1. your name, address and contact details, including email address and telephone number, date of birth and gender;
2. the terms and conditions relating to the relationship between LPW and you;
3. where relevant details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers/other organisations whom you have worked for (in an capacity);
4. information about your marital status, next of kin, dependants and emergency contacts;
5. information about your nationality and entitlement to work (whether paid or unpaid) in the UK;
6. information about your criminal record;
7. details of your schedule (days of work and working hours) and attendance at work;
8. training you have participated in, and related correspondence;
9. details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
10. information about medical or health conditions, including whether or not you have a disability for which LPW needs to make reasonable adjustments;
11. Photographs, video and CCTV footage; and
12. equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

LPW collects this information in a variety of ways. For example, data is collected through application forms, CVs or the similar; obtained from your passport or other identity documents such as your driving licence; from forms complete by you at the start of or during our relationship; from correspondence with you or through interviews, meetings or other assessments.

In some cases, LPW collects personal data about you from third parties, such as references supplied by former employers, or other organisations with whom you have worked for (in any capacity) information from background check providers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personal file, in LPW's HR and management systems and in other ICT systems (including LPW's email system).

Why does LPW process personal data?

We need to process data to enter into a contract or agreement with you and to meet our obligations under that contract or agreement.

In other cases, LPW has a legitimate interest in processing personal data before, during and after the end of the relationship. Processing individual data allows us to:

1. run recruitment and promotion processes;



2. maintain accurate and up-to-date records and contact details (including details of who to contact in the event of an emergency), and records of contractual and statutory rights (where appropriate);
3. operate and keep records, to ensure acceptable conduct within the organisation and workforce management purposes;
4. operate and keep a record of absence and absence management procedures, to allow effective management;
5. obtain professional medical advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law;
6. ensure effective general HR and business administration;
7. provide references on request for individual's either currently or formerly connected LPW;
8. respond to and defend against legal claims; and
9. maintain and promote equality across the organisation.

Where LPW relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of individuals or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out legal obligations (such as those in relation to individuals with disabilities and for health and safety purposes).

Where LPW processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that we use for these purposes is anonymised or is collected with the express consent of individuals, which can be withdrawn at any time. You are entirely free to decide whether or not to provide such data.

Who has access to data?

Your information will be shared internally, including with members of the HR and recruitment team (including payroll and external consultants), your line manager, managers in the business area in which you are designated and ICT staff if access to the data is necessary for performance of their roles.

LPW shares your data with third parties in order to obtain references from other employers, or organisations you have worked for in any other capacity to obtain background checks from third-party providers and obtain necessary criminal records checks from the Disclosure and Barring Service. LPW may also share your data with third parties in the context of a sale of some or all of its business through the provision of a business transfer or service provision change. In those circumstances the data will be subject to confidentiality arrangements.

LPW may also shares your data with third parties that process data on its behalf, in connection with the provision of safeguarding and HR services.

LPW will not transfer your data to countries outside the European Economic Area.

How does LPW protect your data?

We take the security of your data seriously. LPW has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees or representatives in the performance of their duties for the organisation. Data stored is password protected and hard drives are encrypted. Strict access controls are implemented to ensure that only those with permitted access are able to access the relevant data.



Where LPW engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does LPW keep data?

We will hold your personal data for the duration of your retention by LPW. The periods for which your data is held after the end of your retention are 6 years. Data relating to checks made with the Disclosure and Barring Service are retained for 7 years. Details relating to unsuccessful applications to work at LPW in any capacity are retained for 12 months.

Your rights

As a data subject, you have a number of rights. You can:

1. access and obtain a copy of your data on request;
2. require LPW to change incorrect or incomplete data;
3. require LPW to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
4. object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
5. ask LPW to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact LPW's Data Controller, Reece Harris, by emailing: DPO@lpw.org.uk.

If you believe that LPW has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You have some obligations under your contract to provide the organisation with data. Failing to provide the data may mean that you are unable to exercise your rights under our agreement/contract and that LPW cannot fulfil its obligations towards you.

Certain information, such as contact details and your right to work in the UK, have to be provided to enable the organisation to enter into an agreement with you. If you do not provide other information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the relationship.

Automated decision-making

Recruitment decisions in respect of unpaid work for the organisation are not based solely on automated decision-making.