

GENERAL DATA PROTECTION REGULATIONS (GDPR) PRIVACY POLICY

2023-24



DOCUMENT CONTROL

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CHANGE AUTHORITY: BOARD OF DIRECTORS

Name: Juwairiyah Patel Signature:  Date: 24/05/2023
Designation: Director of Operations Review Date: May 2026

RECENT CHANGE HISTORY

VERSION	DATE	REASON FOR CHANGE	CHANGE BY
2	24/05/2023	Full Review and update	Gillian Dewsbury Business Excellence Manager

Please Note: A formal, full review of this document will take place on a 3-yearly basis. However, in the interim, the document will be updated as necessary to remain current with any statutory legislation and/or significant Government guidance updates on the subject.

CHANGE MECHANISM

Any person seeking to alter this document must consult the author before making any change.

L&F Change Authority must endorse any alterations to the approved version of this document before any wider dissemination of the altered document version.

The person making the alteration must indicate every change between the previous (approved) document version and the altered document version.

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1. L&F contact details

Data Protection Officer Name: Gillian Dewsbury

Address: 106 Church Street, Highbridge, Somerset. TA9 3HW

Phone Number: 01278 550261

E-mail: info@landftraining.com

2. The type of personal information L&F Training collect

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (for example, name and contact details)
- Email addresses
- Location Data
- Financial information (e.g. payment details where there is a business need to have this information)
- Employee data (including health related, financial, vetting and pension related)
- Demographic data, where appropriate

3. How L&F get the personal information and why it is held

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- To enable L&F to deliver the services you have required of us
- If you are an employee of L&F; to help L&F carry out its duties in relation to management support, leave, pensions and salary.

We use the information that you have given us in order to:

- Enable L&F to provide the services you have requested from us.
- Help L&F identify the best options in your geographical area (e.g. Employers with apprentice vacancies) to meet your requirements
- Enable L&F to identify the reach of their services (in relation to geography and demographics)
- Carry out relevant vetting checks on potential staff
- Help L&F carry out its duties in relation to management, support, leave, pensions and salary etc., for L&F employees

4. L&F may share this information with:

- Gov.uk Disclosure and Barring Service (for any necessary DBS Checks)
- With the Police or another legal/authorised body, if:
 - They request the information
 - For the prevention of crime
 - It is required by law for the information to be shared
 - L&F personnel feel they or another person's life is at risk
 - L&F personnel realise someone is hurting themselves
 - L&F personnel become aware that a child or young person is being abused: sexually, physically, emotionally, financially or potentially by grooming
 - L&F personnel become aware of an adult who is being abused.

5. Under the UK General Data Protection Regulation (UK GDPR), the lawful bases L&F rely on for processing this information are:

- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting L&F Training's Data Protection Officer
- (b) We have a contractual obligation.
- (c) We have a legal obligation.
- (d) We have a vital interest.
- (e) We need it to perform a public task.
- (f) We have a legitimate interest.

6. How L&F Training store your personal information

Your information is securely stored.

- Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- Confidential paper records will not be left unattended or in clear view anywhere with general access.
- Digital personal data is stored on a secure OneDrive, with access restricted to those L&F personnel with a business need to access the information.
- Where data is saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use.
- Memory sticks will not be used to hold personal information, unless they are password-protected and fully encrypted.
- All electronic devices are password or pass-code protected, to protect the information on the device in case of theft.
- Where possible, L&F enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- L&F Staff and governors will not use their personal laptops or computers for L&F purposes; unless authorised to do so for specific reasons and if their personal laptops have appropriate protections installed.
 - In such cases, no personal data will be used or saved on these devices.
- All necessary members of staff are provided with their own secure login and password, and every Desktop computer, laptop and hand held devices are also password/passcode protected with regularly prompts to users to change their passwords/passcodes.
- Emails containing sensitive or confidential information are password-protected if there are insecure servers between the sender and the recipient.
- Circulation emails (e.g. Newsletters etc.) to learners, employers and other customers are sent using blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- L&F Training no longer use fax facilities. However if it became necessary to send/receive confidential details via a fax, L&F staff will always check that the recipient is correct and will be present to receive the fax, before sending.
- Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from L&F' premises accepts full responsibility for the security of the data.
- Before sharing data, all staff members will ensure:
 - They are allowed to share it.
 - That adequate security is in place to protect it.
 - Who will receive the data has been outlined in a privacy notice.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of L&F containing sensitive information are supervised at all times.

The physical security of L&F' buildings and storage systems, and access to them, is reviewed on a regular basis. If an increased risk in vandalism/burglary/theft is identified, within the

geographical location where the data is stored, extra measures to secure data storage will be put in place.

Below is a table showing how long L&F Training will keep each type of personal information collected; though if our need to retain the information ceases before the time period shown in the table, we will dispose of the information beforehand, as a result of a regular review (at least annually) by the Data Protection Officer.

Please Note: L&F Training will only store data that they need to store and have a legal right to store, for the purposes of providing relevant services to our customers and in order to run and administrate the organisation effectively.

At any time, an individual has the right to ask for their personal details to be removed from L&F Training's records. L&F will always comply with such request unless they have a legal/statutory reason for not doing so (as per section 4 - L&F may share this information with). At least annually, every customer (you) will be contacted to check that the information we hold for you is accurate and still required or appropriate for us to hold.

Type of Data	Maximum time period for which L&F will hold this information, unless you give us permission to retain it for longer.	How will this information be disposed of at the end of this period	Who will have overarching responsibility for reviewing records and making sure they are deleted in line with GDPR best practice
Personal identifiers, contacts and characteristics (for example, name and contact details)	5 years	Electronic - deleted from main drive and backups Paper based records, securely shredded/	Data Protection Officer
Email addresses	5 years	Electronic - deleted from main drive and backups Paper based records, securely shredded/	Data Protection Officer
Location Data	5 years	Electronic - deleted from main drive and backups Paper based records, securely shredded/	Data Protection Officer
Financial information (e.g. payment details where there is a business need to have this information)	5 years	Electronic - deleted from main drive and backups	Data Protection Officer

Type of Data	Maximum time period for which L&F will hold this information, unless you give us permission to retain it for longer.	How will this information be disposed of at the end of this period	Who will have overarching responsibility for reviewing records and making sure they are deleted in line with GDPR best practice
		Paper based records, securely shredded/	
Employee data (including health related, financial, vetting and pension related)	Payroll - 5 years H&S - 20-40 years	Electronic - deleted from main drive and backups Paper based records, securely shredded/	Data Protection Officer
Demographic data, where appropriate	5 years	Electronic - deleted from main drive and backups Paper based records, securely shredded/	Data Protection Officer

7. Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.
- Please contact us via the following, marked for the attention of the Data Protection Officer, if you wish to make a request:
 - Email: info@landftraining.com,
 - Phone Number: 07736 023359
 - Postal Address: L&F Training, 106 Church Street, Highbridge. Somerset TA9 3HW

8. How to complain to L&F Training

If you have any concerns about our use of your personal information, you can make a complaint to us, marked for the attention of the Data Protection Officer at:

- Email: info@landftraining.com,
- Phone Number: 07736 023359
- Postal Address: L&F Training, 106 Church Street, Highbridge. Somerset TA9 3HW

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

9. L&F Training's Concerns and Complaints Process

L&F Training have a separate policy covering the full details of the Appeals, Concerns and Complaints process and procedures (this can be accessed via the L&F Training Website). Below is a brief extract, for ease of reference, of how to raise a concern or complaint:

- A concern or complaint can be made in person, in writing or by telephone. They may also be made by a third party acting on behalf on a complainant, as long as they have appropriate consent to do so.
- Complaints against training staff (except the management team) should be made in the first instance, to Juwairiyah Patel, the Director of Operations, juwairiyah@landftraining.com. Please mark the complaint as Private and Confidential.
- Complaints that involve or are about the management team should be addressed to Saima Ali (Head of HR), via hr@landftraining.com. Please mark such complaints as Private and Confidential.
- For ease of use, a template complaint form is included in the appendix of this document
- If you require help in completing the form, please contact the L&F Training office. You can also ask a third-party organisation, for example the Citizens Advice, to help you.
- In accordance with equality law, L&F Training will consider making reasonable adjustments, if required, to enable complainants to access and complete this complaint's procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations

10. Related Policies, Procedures and Documents

- L&F Training Appeals, Concerns and Complaints Policy and Procedure

11. Appendix 1 - Complaint Form Template

Please complete and return to The Director of Operations who will acknowledge receipt and explain what action will be taken.

Your name:
Learner's name (if relevant):
Your relationship to the learner (if relevant):
Address:
Postcode:
Day time telephone number:
Evening telephone number:
Email address:
Please give details of your complaint, including whether you have spoken to anybody at the company about it.

What actions do you feel might resolve the problem at this stage?

Are you attaching any paperwork? If so, please give details.

Signature:
Date:

Official use

Date acknowledgement sent:

By who:

Complaint referred to:

Action taken:

Date: