



Learning Resource Network

General Data Protection Regulations

Privacy Notice (April 2018)

1. Overview

Learning Resource Network (LRN) is committed to protecting the privacy and security of your personal information. This privacy notice (April 2018) describes how LRN intends to collect and use personal information about its employees, workers and contractors. LRN may also wish to extend this notice (through an abridged version) to other members who are in close communication on a regular basis, such as Governance Body members. This is in accordance with the General Data Protection Regulations (GDPR) which are due to come into effect on 25th May 2018.

2. Data Protection Principles

LRN will comply with data protection law, regulations and obligations in that any information held will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about;
- kept secure.

LRN is a data controller. This means that we are responsible for deciding how we hold and use personal information about individuals. We are required, under data protection legislation, to notify you of the information contained in this privacy notice. This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. LRN reserves the right to update this notice at any time.

3. Intention for this notice

It is important that individuals read this notice, together with any other privacy notice which LRN will provide, from time to time, to ensure members of staff, workers and contractors are aware as to how their personal information will be collected and maintained. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are special categories of more sensitive personal data which require a higher level of protection. We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Next of kin and emergency contact information;
- National Insurance number;
- Bank account details, payroll records and tax status information;
- Salary, annual leave, pension and benefits information;
- Start date;
- Location of employment or workplace;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process);
- Employment records (including job titles, work history, working hours, training records and professional memberships);
- Performance information;
- Disciplinary and grievance information;
- Information about your use of our information and communications systems;

4. How is your personal information collected?

LRN will only collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. LRN may, where necessary, collect additional information from third parties including former employers, credit reference agencies or other background check agencies.

5. CCTV use across the office

LRN will use CCTV cameras at its Romford offices (as of 23rd April) for the purpose of monitoring security at its new offices. The area in which LRN is working is a high volume building with many offices. The office is situated in a location which acts as a main thoroughfare and whilst there is a receptionist on duty, LRN still intends to use CCTV to monitor and maintain a level of security of its staff.

LRN will keep CCTV footage for a maximum of 28 days. Signage is in place across the office to notify staff as to the existence of CCTV and prominent cameras (four) are situated around the office (no covert CCTV is in use). This decision will be subject to monitoring through the statement of compliance and annual review processes.

6. How will LRN use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;

- Where you are a significant member of a team that we need to introduce to a customer or other third party;
- We may also use your personal information in the following situations, which are likely to be rare
- Where we need to protect your interests (or someone else's interests);
- Where it is needed in the public interest or for official purposes.

7. Situations in which LRN will use your personal information

LRN will hold information about its employers, workers and contractors in line with the principles (see section 3) in order to allow LRN to perform its contract with you and to enable us to comply with legal obligations. In some cases, LRN may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights **do not** override those interests. The situations in which LRN will process your personal information are listed below.

- Making a decision about your recruitment or appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- Paying you and deducting tax and National Insurance contributions;
- Liaising with your pension provider;
- Administering the contract we have entered into with you;
- Business management and planning, including accounting and auditing;
- Conducting performance reviews;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of our working relationship;
- Verification of training and development documentation;
- Education, training and development requirements;
- Dealing with customers and other third parties to whom your identity and background information is important;
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud and to monitor your use of information and communication systems to ensure compliance with LRN's ICT policies and procedures;
- To ensure network and information security;
- Equality and diversity monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

7. If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

8. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

10. Our obligations as an employer

We will use your particularly sensitive personal information in the following ways: We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits. We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

14. Data retention

How long will LRN retain information for?

LRN will only retain personal information for as long as necessary to fulfil the purpose of its collection, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company, we will securely destroy your personal information in accordance with applicable laws and regulations.

15. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

16. Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected;

- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below);
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes;
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it;

If you want to review, verify, correct or request erasure of your personal information, or object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

17. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the **Data Protection Officer**. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

18. Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer. If you have any questions about this privacy notice, please contact the **Data Protection Officer, Muhammad Tariq – enquiries@lrnglobal.org**.