

LGSS Learning and Development Privacy Notice

1 – Introduction

Please note that this privacy notice applies to individuals who are not employees of LGSS or one of the council's LGSS Learning & Development serve. Any training; learning or development activity undertaken by council employees is covered by the Employment Privacy Notice.

All personal data we collect from you complies with the data protection principles, as stated in the Data Protection Act 2018.

A key part of this is being open about how we use information and what rights you have in respect of information we collect and hold about you when you undertake training; learning or development activities or are part of an assessment centre process with us.

The information on this page explains how LGSS Learning & Development, will use your personal information when you undertake any training; learning or development activities or are part of an assessment centre exercise. This includes how we collect, process and share it. It also describes how long information is kept and the circumstances in which we might disclose it to a third party.

When you sign up for and /or attend any training, learning or development activities, LGSS Learning & Development collects and processes personal data relating to you. This will include:

- Your name, address and contact details, including email address and telephone number.
- Details of your qualifications, skills, experience, employment history, other relevant experience and achievements
- Whether or not you have a disability or additional support needs for which the organisation needs to make reasonable adjustments
- The outcome and results of any Assessment Centre processes or testing which has formed part of a recruitment process or other internal management process.
- Photographs used during a recruitment or Assessment Centre exercise.

If you are an Apprentice or applying for an apprenticeship, then the following additional information will also be requested:

- Date of Birth
- Salary Details
- Hours of Work
- Unique Learner Number
- National Insurance Number
- Parent & Guardian Details (for Apprentices under 18)

- Citizenship
- Education Health Care Plan
- If you are a Care Leaver
- Equality Monitoring Information (including information about your gender, ethnic origin and health) and
- Long Term Health Conditions.

We collect this information in a variety of ways. For example, data might be contained in application forms, or collected through interviews or other forms of assessment, including tests and/or online tests.

We may also collect personal data about you from third parties, such as names and email addresses when undertaking psychometric testing.

The personal data we collect will be stored in a range of different places, including on your application record, in electronic Learning + Development and HR Management Systems and on other IT systems (including email).

2 - Why does LGSS Learning & Development need to process personal data?

LGSS Learning & Development needs to process data for training; learning and development activity to record any learning interventions delivered and monitor the impact.

In some cases, we need to process data to ensure compliance with legal obligations. For example, Grant Funding and Apprenticeships.

LGSS Learning & Development has a legitimate interest in processing personal data during training, learning and development activity and for keeping records of the process. For example: Attendance at mandatory, statutory and professional training and completion of apprenticeships, qualifications and independent learning.

Processing such data allows us to manage staff training; learning and development and any mandatory aspects required for the safe running of services. We may also need to process data to respond to and defend legal claims.

Where we rely on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of applicants and delegates and has concluded that they are not.

Where we process other special categories of data, such as information about gender, ethnic origin, sexual orientation, health or religion or belief, this is for equality monitoring purposes.

We will not use your data for any purpose other than the training, learning and development activity for which you have applied or for the purposes of the assessment centre.

We will only keep your personal data on file for the purpose of considering you for other suitable learning, training and development activity, if you provide your consent to do so.

You are free to withdraw your consent at any time.

3 - How we use Personal Information

We will request your initial consent to process the personal data that you supply when you first apply for training, learning or development with LGSS Learning & Development. However, after this point we will rely on legal and legitimate interests as reason for your processing data.

Whenever we use information, we will always limit this to only what is needed and ensure that it is used safely and securely. We require anyone we share information with, or who uses it on our behalf, to do so too.

All staff have access to training on data protection and information security.

4 - Who has access to data?

Your information will be shared internally for the purposes of the training, learning or development activity and only be accessed and processed by authorised personnel for the performance of their duties (i.e. the Learning & Development, HR and Recruitment Teams, Line Managers in the relevant business area, and IT staff if access to the data is necessary).

LGSS Learning & Development will not share your data with third parties unless consent is given.

We will then share your data with:

- Organisations that provide grants or funding which we access to provide your development
- External training providers who will deliver some or all of the learning you access via by us.
- Organisations who provide and regulate the use of professional assessment instruments that we may use as part of our development or recruitment activities.

Your data will be stored in the UK and we will not transfer it outside the European Economic Area. The only exceptions to this are that we may need to send some of your personal information overseas to providers of our psychometric testing service(s) or receive data from outside the EU from third party suppliers.

Any such processing will be carried out strictly in accordance with UK and EU privacy legislation and the appropriate contractual safeguards which the Council has put in place.

5 - How does the LGSS Learning & Development protect data?

LGSS Learning & Development takes the security of your data seriously and has a range of robust policies, processes and technical measures in place to safeguard personal information.

Access to systems that hold employment related information is restricted to authorised personnel through the use of unique identifiers and passwords. Your information is stored on systems that are protected by secure network architectures and are backed-up on a regular basis (to a second secure location) for disaster recovery and business continuity purposes; and to avoid the risk of inadvertent erasure or destruction.

6 - How long does LGSS Learning & Development keep data?

We only keep information for as long as it is needed.

Following training, learning or development activity we will hold your data on file for up to 7 years following completion of the course or programme. (In exceptional circumstances, we may need to retain your record for a further duration in order to comply with legal or Home Office requirements).

Psychometric test data will be stored in a secure folder that is password protected for a period of twelve months.

If you register and agree to allow us to keep your personal data on file, we will hold your data on file for [time period] from the date you completed the last training, learning or development activity.

At the end of that period, your data will be deleted or destroyed.

Where you have attended an assessment centre or completed testing as part of a recruitment process and your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment with us. The periods for which your data will be held will be provided to you in the employee privacy notice and retention schedule.

7 - Third Party Processing

LGSS Learning & Development has a number of contracts with a third party external suppliers and service providers e.g., who provide specialist services with occupational competencies

These third parties will process applicant information in accordance with our instructions and make decisions regarding the information as part of the delivery of their services. They are also required to put in place appropriate security measures that ensure an adequate level of protection for personal information.

8 - What Rights do you have?

You have a number of rights relating to the data we hold about you. These include the right to:

- Access (to obtain a copy of your personal data, on request)
- Rectification (to request inaccurate or incomplete data be corrected)
- Erasure (to request that your data is deleted)
- Restrict processing (to request that we stop or do not use your data in a certain way)
- Portability (in some cases, you can ask to receive a copy of your data in a commonly-used electronic format so that it can be given to someone else)
- Object (generally to make a complaint about any aspect of our use of your data)
- Ask the organisation 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.
- Have explained if there will be any automated decision-making, including profiling, based on your data and for the logic behind this to be explained to you.

If you would like to exercise any of these rights or are unhappy with any aspect of how your information has been collected and/or used, please contact the Data Protection Officer named in Section 11 below.

Whether we can agree to your request will depend on the specific circumstances and if we cannot then we will explain the reasons why.

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

9 - Automated Decision-Making

Our training, learning or development activity processes are not based solely on automated decision-making.

10 - What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to LGSS Learning & Development for training, learning or development activity. However, please be aware that if you decline, it may not be possible to progress your request for training, learning or development, as we will be unable to process the data needed to do this.

11 - Data Protection Officer Contact Details

As LGSS Learning & Development provides services for a number of council's; organisations and individual's the relevant Data Protection Officer details are listed below:

Northamptonshire County Council

Email: DPO@northamptonshire.gov.uk

Tel. No: 01604 368360

Post: Data Protection Officer, Northamptonshire County Council, One Angel Square, Northampton, NN1 1ED

Cambridgeshire County Council and Peterborough

Name: Dan Horrex

Email: Data.protection@cambridgeshire.gov.uk

Tel. No: 01223 699137

Post: Info and Records Team, OCT1224, Cambridgeshire County Council, Shire Hall, Cambridge, CB3 0AP

Milton Keynes Council

Name: Sarah Gonsalves

Email: Data.Protection@Milton-Keynes.gov.uk

Tel. No: 01908 254900

Post: Data Protection, Saxon Court | 502 Avebury Boulevard | Milton Keynes | MK9 3HS