



APPRENTICESHIPS

Privacy Policy

Change history		
Version	Issue Date	List of Amendments or remarks as applicable
1.	20 August 2013	Information Sensitivity
2.	31 July 2014	Formatting updated
3.	27 February 2015	Introduction, scope and purpose added. Formatting updated with new house style guidelines.
4.	23 October 2015	Policy updated with the new company names and logos.
5.	1 April 2016	SMT re-write of policy
6.	1 July 2017	Policy review
7.	1 July 2018	Policy review
8.	1 January 2019	Updated to reflect change in company name to LDN Apprenticeships
9.	2 January 2021	Policy checked for accuracy
10.	9 December 2021	Updated to new document format. Reviewed and updated the whole policy.
11.	1 February 2022	Companywide policy review completed and new version issued
12.	1 February 2023	Updated 3 rd party suppliers list and main tel number
12.	1 February 2024	Annual review, no changes.



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Scope

The scope of the Privacy Policy covers all LDN Apprenticeships employees. The policy also refers to apprentices, learners, clients, job applicants, contractors and other data subjects, who are entitled to know:

- What information LDN Apprenticeships holds and processes about them and why.
- How to gain access to it.
- How to keep it up to date or request its deletion.
- What LDN Apprenticeships is doing to comply with its legal obligations under privacy law.

Purpose

This policy and its supporting procedures and guidance aim to ensure that LDN Apprenticeships (also referred to as “LDN” in this policy) complies with its obligations as a Data Controller under the UK Data Protection Act, 1998 and GDPR, 2018 (now known as UK GDPR), and processes all personal data in compliance with the Data Protection Principles which are set out in the Acts. These laws require LDN Apprenticeships to protect personal information and control how it is used in accordance with the legal rights of the data subjects – the individuals whose personal data is held.

Review Period and Ownership

The Privacy Policy will be reviewed annually and may be altered from time to time considering legislative changes or other prevailing circumstances. The Privacy Policy is owned by the HR Manager.

Promotion of Policy

A shortened version of the policy is available as part of the Employee Handbook, which all staff are required to sign on joining. Updates to the handbook are completed annually, and staff are required to confirm that they have read the updates by signing.

Engagement and Training

This policy can be accessed by employees via the Company’s Intranet. A copy of this policy is also detailed in the Employee Handbook which all staff have access to via the Company’s intranet and are required to read and sign. In addition, the Company sends a general notice through Slack, our communication platform for staff to read and sign the policy when required. Staff will be issued with this Policy when there are any updates, or as part of refresher training.



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Introduction

Under Data Protection Law personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subjects' rights.
- Be kept safe from unauthorised access, accidental or deliberate loss or destruction.
- Not be transferred to a country outside the European Economic Area unless that country has equivalent levels of protection for personal data.

In order to manage these risks, this policy sets out responsibilities for all managers, staff and contractors and anyone else that can access or use personal data in their work for LDN Apprenticeships.

The policy also sets out a framework of governance and accountability for data protection compliance across LDN. This incorporates all policies and procedures that are required to protect LDN information by maintaining:

- Confidentiality: protecting information from unauthorised access and disclosure
- Integrity: safeguarding the accuracy and completeness of information and preventing its unauthorised amendment or deletion.
- Availability: ensuring that information and associated services are available to authorised users whenever and wherever required.

Objectives

LDN Apprenticeships will apply the Data Protection Principles to the management of all personal data throughout the information life cycle by adopting the following policy objectives.

We will apply “privacy by design” principles when developing and managing information systems containing personal data. This means that we will:

- Use proportionate privacy impact assessment to identify and mitigate data protection risks at an early stage of project and process design, for all new or updated systems and processes, that present privacy concerns and in managing upgrades or enhancements to systems used to process personal data.



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- Adopt data minimisation: we will collect, disclose and retain the minimum personal data for the minimum time necessary for the purpose.
- Anonymise personal data wherever necessary and appropriate, for instance when using it for statistical purposes.

Process personal data fairly and lawfully. This means that we will:

- Only collect and use personal data in accordance with the conditions set down under the Data Protection Act and UK GDPR legislation.
- Ensure that if we collect someone's personal data for one purpose, we will not reuse their data for a different purpose that the individual did not agree to or expect.
- Treat people fairly by using their personal data for purposes and in a way that they would reasonably expect.

Seek informed consent when it is appropriate to do so. This means that we will seek the consent of individuals to collect and use their personal data:

- Whenever the law requires us to do so, or
- Where their consent will be specific, informed and freely given.

In some circumstances, it is not appropriate to seek an individual's consent to process their data. For instance:

- Where we are required to process personal data by law, for instance to comply with Home Office immigration rules.
- Where we disclose personal data to the police to assist a criminal investigation and seeking the individual's consent would frustrate the purpose of the investigation by tipping off a suspect.
- Where we need to process someone's personal data to fulfil a contract or our legitimate purposes, such as conducting examinations and assessments, and the individual cannot reasonably refuse or withdraw consent.

In all other circumstances, we will explain:

- What personal data collection is voluntary and why and the consequences of not providing it.
- What personal data collection is mandatory and why we are entitled or obliged to process their data, for instance as a condition of employment or enrolment on a programme of study.

Inform data subjects what we are doing with their personal data. This means that, at the point that we directly collect personal data (i.e. not through a 3rd party data provider), we will explain in a clear and accessible way:

- What personal data we collect.



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- For what purposes.
- Why we need it.
- How we use it.
- How we will protect their personal data.
- To whom we may disclose it and why.
- Where relevant, what personal data we publish and why.
- How data subjects can update their personal data that we hold.
- How long we intend to retain it.

We will publish this information, tailored for employees, apprentices, learners, contractors, job applicants, candidates, clients and other groups of people on our website and where appropriate in printed formats. We will review the content of these Privacy Notices regularly to ensure they comply with the latest legislation and expectations.

We will provide simple and secure ways for our apprentices, learners, staff and other data subjects to update the information that we hold about them such as home addresses. Where we process personal data to keep people informed about LDN's activities and events we will provide in each communication a simple way of opting out of further marketing communications.

In this way we will provide accountability for our use of personal data and demonstrate that we will manage people's data in accordance with their rights and expectations.

Uphold individual's rights as data subjects. This means that we will uphold their rights to:

- Access a copy of the information comprising their personal data, responding to requests for their own personal data (subject access requests) in a fair, friendly and timely manner.
- Request that their data is deleted, responding to this request in a fair, friendly and timely manner.
- Object to processing that is likely to cause or is causing unwarranted and substantial damage or distress.
- Prevent processing for direct marketing.
- Object to decisions being taken by automated means.
- Have inaccurate personal data rectified, blocked, erased or destroyed in certain circumstances.
- Claim compensation for damages caused by a breach of the UK Data Protection Act.

Protect personal data. This means that we will:

- Control access to personal data so that staff, apprentices, learners, contractors and other people working on LDN business can only see such personal data as is necessary for them to fulfil their duties.



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- Require all LDN employees, apprentices, learners, contractors and others who have access to personal data in the course of their work to complete basic data protection training, supplemented as appropriate by procedures and guidance relevant to their specific roles.
- Set and monitor compliance with security standards for the management of personal data as part of our wider framework of information security policies and procedures.
- Provide appropriate tools for employees, apprentices, learners, contractors and others to use and communicate personal data securely and when working away from LDN Head Office, to ensure the provision of secure virtual private network, encryption and cloud solutions.
- Take all reasonable steps to ensure that all suppliers, contractors, agents and other external bodies and individuals who process personal data for LDN Apprenticeships enter into Data Processor Agreements and comply with auditable security controls to protect the data, in compliance with our procedures for approving, monitoring and reviewing personal data processing agreements.
- Maintain Data Sharing Agreements with partners and other external bodies with whom we may need to share employees, apprentices, learners, contractors, candidates and others personal data to deliver shared services or joint projects to ensure proper governance, accountability and control over the use of such data.
- Ensure that our apprentices, learners and candidates are aware of how privacy law applies to their use of personal data during their studies and how they can take appropriate steps to protect their own personal data and respect the privacy of others.
- Manage all subject access and third-party requests for personal information about employees, apprentices, learners, contractors and other data subjects in accordance with our procedures for responding to requests for personal data.
- Make appropriate and timely arrangements to ensure the confidential destruction of personal data in all media and formats when it is no longer required for LDN business.

Retain personal data only as long as required. This means that we will:

- Apply the LDN records retention policies relevant to each professional service function (see Appendix 1 - Record Retention Periods).
- Keep records locally only as long as required in accordance with these policies and then.
- Destroy them securely in a manner appropriate to their format, or
- Transfer them by arrangement for longer term storage or archival preservation.

Some LDN records containing personal data, including electronic records of apprentices and their programmes, are designated for permanent retention as archives for historical and statistical purposes. When managing access to archives containing personal data we may:



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- Apply exemptions to public rights of access to information as appropriate in accordance with the data subjects' rights to privacy.
- Redact personal data, or
- Withhold specific categories of record, such as employee records, for the lifetime of the employee and their identifiable next of kin.

Policy Data Subjects

These include, but are not confined to: prospective applicants, applicants for our apprenticeship and learning programmes and posts, current and former learners and apprentices, current and former employees, family members where emergency or next of kin contacts are held, workers employed through temping agencies, research subjects, external researchers, visitors, and volunteers, clients, conference delegates, people making requests for information or enquiries, complainants, professional contacts and representatives of funders, partners and contractors.

Users of Personal Data

The policy applies to anyone who obtains, records, can access, store or use personal data in the course of their work for LDN Apprenticeships. Users of personal data include employees, workers, apprentices, learners, contractors and candidates of LDN, contractors, suppliers, agents, LDN partners and external researchers and visitors.

Where the Policy applies

This policy applies to all locations from which LDN Apprenticeships personal data is accessed including home working.

Lines of Responsibility

All users of LDN Apprenticeships information are responsible for:

- undertaking relevant training and awareness activities provided by LDN to support compliance with this policy.
- Taking all necessary steps to ensure that no breaches of information security result from their actions.
- Reporting all suspected information security breaches or incidents promptly so that appropriate action can be taken to minimise harm.
- Informing LDN of any changes to the information that they have provided to LDN in connection with their employment or studies, for instance, changes of address.

The **Chief Executive Officer** (CEO) of LDN Apprenticeships, has ultimate accountability for LDN's compliance with data protection law. The CEO:



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- Has senior management accountability for information governance including data protection management, reporting to the Board of Directors on relevant risks and issues.
- Is responsible for information governance including data protection management and for providing proactive leadership to instil a culture of information security within LDN Apprenticeships through clear direction, demonstrated commitment, explicit assignment, and acknowledgment of information security responsibilities.
- Is responsible for ensuring that data protection and wider Information Security controls are integrated within the risk, business continuity management and audit programmes and for liaising with insurers to ensure that the systems in place meet insurance requirements.
- Is responsible for ensuring that controls to manage the physical security of LDN Apprenticeships take account of relevant data protection risks and are integrated into the information security management system.

The **Chief Operating Officer (COO)** is the designated Data Protection Officer, who is responsible for recommending information governance and security strategy and has executive oversight of policies, procedures and controls to manage information security and data protection.

All **Heads of Departments** are responsible for implementing the policy within their business areas and for adherence by their staff. This includes:

- Assigning generic and specific responsibilities for data protection management.
- Managing access rights for information assets and systems to ensure that staff, apprentices, learners, contractors and agents have access only to such personal data is necessary for them to fulfil their duties.
- Ensuring that all staff in their business areas undertake relevant training provided by LDN and are aware of their accountability for data protection.
- Ensuring that staff responsible for any locally managed IT services liaise with LDN Information Technology staff to put in place equivalent IT security controls.

The **Head of Technology** is responsible for ensuring that centrally managed IT systems and services take account of relevant data protection risks and are integrated into the information security management system and for promoting good practice in IT security among relevant staff.

The **Human Resources Manager** is responsible for reviewing relevant human resources policies and procedures, in order to support managers and staff in understanding and discharging their responsibilities for data protection through the recruitment, induction and on-boarding, training, promotion, discipline and leaver management processes.

The **Delivery Director** is responsible for reviewing relevant apprentice and learner administration policies and procedures to integrate with the information security management system and for oversight of the management of apprentice and learner records and associated personal data across LDN Apprenticeships.



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The **Senior Management Team** are responsible for reviewing the effectiveness of data protection policies and procedures as part of its wider oversight of information security management.

Implementation

This policy is implemented through the development, implementation, monitoring and review of the component parts of LDN's information security management systems. These include:

- Undertaking information risk assessments to identify and protect confidential and business critical information assets and IT systems.
- Coordination of effort between relevant Heads of Departments to integrate, IT, physical security, people, information management, and risk management and business continuity to deliver effective and proportional information security controls.
- Review and refresh of all relevant policies and procedures.
- Designation of information governance coordinators for each area.
- Generic and role specific training and awareness.
- Embedding information governance requirements into procurement and project planning.
- Information security incident management policies and procedures.
- Business continuity management.
- Monitoring compliance and reviewing controls to meet business needs.

Related Policies and other Information

LDN Apprenticeships Policies and procedures

This policy should be read in conjunction with LDN Apprenticeships IT Policy and Data Protection and GDPR Policy, which are reviewed and updated as necessary to meet LDN's business needs and legal obligations.

Legal Requirements and external standards

Effective data protection and information security controls are essential for compliance with U.K. and Scottish law and other relevant law in all jurisdictions in which LDN operates.

Legislation that places specific data protection, information security and record keeping obligations on organisations includes, but is not limited to:

- GDPR 2018 (Now UK GDPR)
- Computer Misuse Act 1990



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- Data Protection Act 1998
- The Data Protection (Processing of Sensitive Personal Data) Order 2000
- Environmental Information (Scotland) Regulations 2004
- Freedom of Information (Scotland) Act 2002
- Privacy and Electronic Communications Regulations 2003
- Regulation of Investigatory Powers Act 2000
- Regulation of Investigatory Powers (Scotland) Act 2000
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000

All current UK Legislation is published at <https://www.legislation.gov.uk/>

UK Information Commissioner's Office (ICO) Statutory Codes of Practice, including:

- Anonymisation
- CCTV
- Data Sharing
- Employment Practices
- Personal Information Online
- Privacy Notices
- Subject Access

Definitions

Information

The definition of information includes, but is not confined to, paper and electronic documents and records, email, voicemail, still and moving images and sound recordings, the spoken word, data stored on computers or tapes, transmitted across networks, printed out or written on paper, carried on portable devices, sent by post, courier or fax, posted onto intranet or internet sites or communicated using social media.

Personal Data

Information in any format that relates to a living person who can be identified from that information or other information held by LDN Apprenticeships, its employees, apprentices, learners, its contractors, agents and partners, or other third parties.

Although the Data Protection Act applies only to living people, the scope of this policy also includes information about deceased individuals. This is because disclosure of information about the deceased may still be in breach of confidence or otherwise cause damage and distress to living relatives and loved ones.

Sensitive Personal Data



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Sensitive personal data (as defined in Section 2 of the Data Protection Act 1998) is personal data relating to an identifiable individual's a) racial or ethnic origin; b) political opinions; c) religious or other beliefs; d) membership of a trade union; e) physical or mental health or condition; f) sexual life; g) proven or alleged offences, including any legal proceedings and their outcome.

In addition, LDN's definition of High Risk Confidential Information includes the following personal data: Any other information that would cause significant damage or distress to an individual if it was disclosed without their consent, such as bank account and financial information, marks or grades, biometrics, genetics or medical history.

Data Controller

An organisation which determines the purposes for which personal data is processed and is legally accountable for the personal data that it collects and uses or contracts with others to process on its behalf.

Data Processor

In relation to personal data, any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

Data Subject

A person whose personal data is held by LDN Apprenticeships (for the purposes of this policy) or any other organisation (for general purposes).

Data usage

Processing, creating, storing, accessing, using, sharing, disclosing, altering, updating, destroying or deleting personal data.

Confidential Information

The definition of confidential information can be summarised as:

- Any personal information that would cause damage or distress to individuals if disclosed without their consent.
- Any other information that would prejudice LDN's or another party's interests if it were disclosed without authorisation.

Information we may collect

During the process of registering a user of LDN Apprentices services we will collect and process some or all of the following personal data:



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Information you provide to us:

- **Personal Data:** You may voluntarily decide to provide us with personal information about you by filling in forms, by corresponding with us by telephone, e-mail or otherwise.
 - This includes information you provide when you register to use our site, subscribe to our services, participate in discussion boards or other social media functions on our Site, enter a competition, promotion or survey, and when you report a problem with our Site. You provide us with this information in order to receive the apprenticeship/ learner recruitment and employment opportunity matching services we provide, when applying for vacancies within LDN and to receive information about new opportunities we are working on that may be of interest to you. The information you give us may include your name, date of birth, address, e-mail address and phone number, postcode, academic results, curriculum vitae, citizenship, right to work or visa status, personal description and photographs, video interviews, personality and psychometric test answers and results, as well as your previous employment history. We use this information to assess your eligibility for job vacancies and also for apprenticeship/learning opportunities to match you to suitable opportunities and to communicate with you.
 - When you post content (text, images, photographs, messages, comments or any other kind of content that is not your e-mail address) on any of our platforms (Learning Hub, Career Hub, Employer Hub, Slack), the information contained in your posting will be stored on our systems and LDN Apprenticeship employees and other stakeholders may be able to see these as part of your digital profile.
 - If you provide us with your email address and / or phone number we may contact you by email, phone or SMS to discuss our services. We may also use this information to send you content and recommendations based on your interests and on opportunities that may be of interest to you. You have the ability to amend and delete this information from your profile. We will inform you if we change the information we collect for these purposes or change the sub-processors we use as part of providing this service to you.
- **Special Category Data:** You may voluntarily consent to provide us with sensitive personal data about yourself (e.g. details of your ethnic origin) by filling in forms on our Site and on our systems or by completing electronic forms we ask you to complete as part of your apprenticeship, learner or job application. We use this sensitive data to track the diversity of applicants, ensure that our clients are presented with a diverse selection of candidates, to track success of candidates from different ethnic groups, and to ensure that we have no internal biases. We also collect your ethnicity because we are required to collect and report information this to the Education & Skills Funding Agency (ESFA), the government agency that regulates apprenticeship training. We protect this



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information by ensuring this information is not made visible to our clients and minimise the members of our team who can access this information to those who need to report on it to the ESFA. We may also use this data in anonymised datasets, which removes your personal identifiers, for the purposes of understanding our users and candidate pool, equality monitoring and reporting purposes, and as aggregated data for marketing purposes.

Information we collect about you:

With regard to each of your visits to our platforms, we may automatically collect the following information:

- **Information collected by our services:** including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- **Information about your visit (log files):** including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Cookies:** Our website and other platforms use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, please click here for [“Information About Our Use of Cookies.”](#)
- **Google Analytics:** We use Google Analytics to help analyse how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site and use Services, what pages they visit, and what other sites they used prior to coming to Our Site. We use the information We get from Google Analytics only to improve Our Site and Service. Google Analytics collects only the IP address assigned to You on the date You visit the Site, rather than Your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with Your Personal Data. Although Google Analytics plants a persistent Cookie on Your web browser to identify You as a unique user the next time You visit the Site and use Services, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about Your visits to the Site and use of Services is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Information we receive from other sources



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We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with other data which has been collected on other sites. We also work closely with carefully selected third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

How do we use Personal Information

We use personal information held about you in the following ways:

Information you have provided to us

We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you with information about goods or services we feel may interest you. If you are an existing client, we will only contact you by electronic means (e-mail or SMS) or by phone with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new client, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the registration form);
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you.

We will use this information:

- to administer our sites and other platforms and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our sites and other platforms to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our sites and other platforms safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;



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- to make suggestions and recommendations to you and other users of our sites and other platforms about goods or services that may interest you or them.

Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Transfer of your information

The data that we collect from you is stored on Salesforce.com within an EU Datacentre and supporting systems and in compliance with applicable EU data protection and privacy laws and regulations. As part of our delivery of the service, we may share your digital profile with employers, located outside of the European Economic Area (EEA) in the pursuit of an apprenticeship or employment position. By agreeing to our Privacy Policy and subsequently submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this Privacy Policy including an assessment of the data protection and information security capabilities of any third-party data processors.

We may share your information with selected third parties including:

Apprentice and Learner Information

By signing up to the apprenticeship/ learner recruitment and employment opportunity matching services you agree to allow LDN Apprenticeships to share your digital profile and contact details (email and phone number) with any potential employer for the purpose of providing a recruitment service and the Service to you. Information relating to National Insurance Number, Ethnicity, Passport, National ID or Visa details or Home Address will never be shared with Employers without your consent, through the performance of a contract we have with you, or where processing is required for compliance of a legal obligation to which we are subject.

Information is shared with prospective employers as part of our contextual flagging system which supports our employers in understanding applicant performance “in context”, when they are deciding who to interview from the shortlist of candidates provided to them by LDN. This also includes any special health or disability requirements you might have when attending interviews or otherwise meeting your employers.

Employers are also provided with information about apprentices on-programme performance, assessment feedback, on-programme feedback and the apprentices views and opinions of the programme.

LDN also tracks the wellbeing, welfare and safety of apprentices and applicants as part of our Safeguarding Policy and procedures.



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LDN may also share apprenticeship contact details with other apprentices within their apprenticeship cohort for administrative purposes.

LDN is contractually required to share apprentices' information with:

- The Education and Skills Funding Agency and the Department for Education, relating to name, date of birth, sex, ethnicity, address and postcode, household situation, learning needs, disabilities and health conditions, employer name and address, apprenticeship for study, funding amount and start and end date;
- The Digital Apprenticeship Services, relating to name, date of birth, unique learner number and qualifications; and
- End Point Assessment Agencies: (i) for apprentices - relating to name, date of birth, gender, ethnic origin (if provided), home address, email address, phone number, National Insurance Number, unique learner number, qualifications, criminal record, role fit, work history, quality assurance information; and (ii) for employers - relating to: employer name, employer address, line manager name, line manager email address, line manager job title and Company ERN.

In addition, we use a number of online services or 3rd party suppliers who may store data on our behalf. These include:

Microsoft One-drive
Slack
BambooHR
Salesforce
Xero
Microsoft Office 365
MS Planner
Microsoft SharePoint
Thinkific
MS Teams

Analytics & Site Optimisation

Analytics and search engine providers that assist us in the improvement and optimisation of our site e.g. Google.

Processors, sub-processors & suppliers we work with

We have listed the third-party processors, suppliers and sub-processors we currently work with. We ensure we have a written contract in place with any third-party processor we use to ensure that the processor only acts on our written instruction, that we are confident in the security of the data we have shared, and that we can perform audits and inspections to ensure that the data we share with them is secure and they are compliant with relevant data protection laws. These third-party service providers are



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required not to use your Personal Data other than to provide the services requested by us.

Information About Our Use of Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use of e-billing services, etc.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie	Name	Purpose	More information
Google Analytics	Google Analytics	To monitor page views	Google Analytics Cookie Usage on Websites

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.



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Children's Privacy

We do not knowingly collect, maintain, or use personal information from children under 16 years of age, and no part of our Services is directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at Info@ldnapprenticeships.com

Business Transfers

We may share or transfer your information on connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Contact us

If you have questions or comments about this Policy, contact our Data Protection Officer (DPO), Matthew Rogers, by email at info@ldnapprenticeships.com, by phone: 02038848816, or by post to:

Matthew Rogers
LDN Apprenticeships
278-280 South Lambeth Road,
London SW8 1UJ

Appendix 1 – Record Retention Periods

The main UK legislation regulating **Statutory Retention Periods** is summarised below.

Record types

Accident books, records/reports – 3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21).

Accounting records - 3 years for private companies

Coronavirus Job Retention Scheme - 6 years for furlough records.

First aid training - 6 years after employment.

Fire warden training - 6 years after employment.

Health and Safety representatives and employees' training - 5 years

Income tax and NI returns - Not less than 3 years after the end of the financial year to which they relate.

Medical records - 40 years from the date of the last entry.

National minimum wage records - 3 years after the end of the pay reference period

Payroll wage/salary records - 6 years from the end of the tax year to which they relate.

Records relating to children and young adults (including Apprentices and Learners) - until the child/young adult reaches the age of 21.

Retirement Benefits Schemes – 6 years from the end of the scheme year

Statutory Maternity Pay - 3 years after the end of the tax year in which the maternity period ends.

Subject access request - 1 year following completion of the request.

VAT deferral (COVID-19) – to support businesses 6 years.

Whistleblowing documents - 6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data should be removed immediately.

Working time records - 2 years from date on which they were made.

Recommended Retention Periods (CIPD, 2021)



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Record types

Actuarial valuation reports - Permanent

Assessments under health and safety regulations and records of consultations with safety representatives and committees - Permanent

Collective agreements - 6 years after the agreement ends.

COVID-19 vaccination records – TBC depending on legislation but currently recommended for 6 years

CCTV footage - 6 months following the outcome of any formal decision or appeal.

Driving offences – when conviction is spent

Flexible working requests - 18 months following any appeal.

Inland Revenue/HMRC approvals - Permanent

Money purchase details - 6 years after transfer or value taken.

Parental leave - 18 years from the birth of the child.

Pension records - 12 years after the benefit ceases.

Pension scheme investment policies - 12 years from the ending of any benefit payable under the policy.

Personnel files and training records (including formal disciplinary records and working time records) - 6 years after employment ceases but note that it may be unreasonable to refer to expired warnings after two years have elapsed.

Recruitment application forms and interview notes - 6 months to a year.

Redundancy details - 6 years from the date of redundancy.

References - At least one year after the reference is given

Right to work in the UK checks - 2 years after employment ends.

Senior executives' records - 6 years after the employee has left

Statutory Sick Pay (SSP) records - least 6 months after the end of the period of sick leave in case of a disability discrimination claim. However, if there's a personal injury claim, the limitation is 3 years.



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Termination of employment - At least 6 years although the ICO's retention schedule suggests until employee reaches age 100.

Terms and conditions including offers, written particulars, and variations - 6 years after employment ceases.

Trade union agreements - 10 years after ceasing to be effective.

Trust deeds and rules – Permanent.

Trustees' minute books – Permanent.

Works council minutes – Permanent.

Recommended Retention Periods for Learners and Apprentices – (ESFA, 2021)

Learner files - 6 years from date study ended, or 31/12/2030 if ESF-funded.

'Live Portfolios' – 2 years from end of course.

Policy Sign Off

The current version of this policy has been signed off by the Chief Executive Officer.

Signature

A handwritten signature in black ink, appearing to read 'S. Bozzoli', written over a horizontal line.

Name

Simon Bozzoli

Date

1 February 2024