



**Little Sisters
of the Poor**
HOSPITALITY AT HEART

PRIVACY NOTICE – STAFF UNITED KINGDOM

In accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, this Notice sets out what information Little Sisters of the Poor (LSP) holds on 'Staff' and how that information is processed. It explains how we use that information, how it is protected and the rights of those whose information we hold.

'Staff' includes: prospective applicants, employees, volunteers, contractors, and those on placements.

Who we are and Contact Details

The Little Sisters of the poor is the Data Controller for the personal information that we process. The Little Sisters of the Poor care for the elderly poor in the spirit of humble service which we have received from Jeanne Jugan. The Little Sisters of the Poor have the following registered addresses.

England Registered Charity Number: 234434

Provincial Residence
Little Sisters of the Poor
St. Peters Residence
2A Meadow Road
South Lambeth
London
SW8 1QH

Title: Privacy Notice – Staff United Kingdom

Version: 4.0

Last Reviewed: June 2026



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Scotland (Glasgow) Scottish Charity Number: SC1047370

St Joseph's
Little Sisters of the Poor
14 Cumnock Road
Glasgow
G33 1QT

Scotland (Greenock) Scottish Charity Number: SC1047397

Holy Rosary
Little Sisters of the Poor
44 Union Street
Greenock
PA16 8DP

If you have any questions, wish to make a data protection complaint, or you wish to exercise your rights, please contact our Data Protection Officer, using the details below.

Email (England): DPO@LSPLONDON.CO.UK

Email (Scotland): DPO@LSPSCOTLAND.COM

Post: Data Protection Officer
Little Sisters of the Poor
St. Peters Residence
2A Meadow Road
South Lambeth
London SW8 1QH

This notice applies to current and former employees, volunteers, workers, those on placements, and contractors.

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What data do we have

We keep several categories of personal data on our staff in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each employee / volunteer and we also hold the data within our computer systems, for example, word documents spreadsheets and time recording systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers
- b) name and contact details of your next of kin
- c) your photograph
- d) your gender, marital status, information of any disability you have or other medical information
- e) right to work documentation
- f) Equal Opportunity Information
- g) information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter or application form
- h) references from former employers
- i) details on your education and employment history etc
- j) bank account details
- k) tax codes
- l) driving licence
- m) criminal convictions
- n) Medical Information
- o) information relating to your employment with us, including:
 - i) job title and job descriptions
 - ii) your salary
 - iii) your wider terms and conditions of employment



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- iv) details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
 - v) internal and external training modules undertaken
 - vi) information on time off from work including sickness absence, family related leave etc
- p) CCTV footage
- q) IT equipment uses logs including telephones and internet access.

Collecting your Data

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your employment.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references.

Personal data is kept in files or within the Company's HR and IT systems and records systems.

Lawful Basis for Processing

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the employment contract we have with you, including ensuring you are paid correctly.

The information below categorises the types activities your Data is processed for:



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Activity using personal data
Carry out the employment contract that we have entered into with you e.g. using your name, contact details, education history, information on any disciplinary, grievance procedures involving you
Ensuring you are paid
Ensuring tax and National Insurance is paid
Carrying out checks in relation to your right to work in the UK
Making reasonable adjustments for disabled employees
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion
Making decisions about salary and other benefits
Effectively monitoring both your conduct, including timekeeping and attendance, and your performance and to undertake procedures where necessary
Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
Implementing grievance procedures
Assessing training needs
Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments
Gaining expert medical opinion when making decisions about your fitness for work
Managing statutory leave and pay systems such as maternity leave and pay etc
Business planning and restructuring exercises
Dealing with legal claims made against us
Preventing fraud
Ensuring our administrative and IT systems are secure and robust against unauthorised access

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Personal information is processed on the following lawful basis:

- Contract : In order to fulfil a contract, including work experience placement, university placement, and volunteer agreements. Or to take steps to enter into a contract.
- Legal Obligation: The Little Sisters of the Poor have a legal obligation to process your personal data, such as undertaking 'right to work' checks, paying salary, Taxation, and enrolment in your pension.
- Legitimate Interest: The Little Sisters of the Poor have a legitimate interest in having a trained, competent, paid and well managed workforce to provide services.
- Recognised Legitimate Interests: The Little Sisters of the Poor have recognised legitimate interests in processing personal data for the purpose of crime prevention, safeguarding, emergencies

Special Categories of Data

Special categories of data is data relating to your:

- a) health
- b) sex life *
- c) sexual orientation*
- d) race
- e) ethnic origin
- f) political opinion*
- g) religion*
- h) trade union membership
- i) genetic* and biometric data**

*Little Sisters do not collect or process this data

**Biometric data is only collected in Homes using Biometric systems.



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We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) in our sickness absence management procedures
- c) to determine reasonable adjustments
- d) Homes using biometric systems for the purpose of using biometric clocking system

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.
- e) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services

Failure to Provide Data

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering a contract of employment with you. This could include being unable to offer you employment or administer contractual benefits.

Criminal Convictions Data

We will only collect criminal conviction data via our application form and through a Disclosure and Barring (DBS) in England, or Disclosure Scotland where it is appropriate given the nature of your role and where the law



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permits us. This data will usually be collected at the job offer stage for the appointed candidate, however, may also be collected during your employment. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of legal obligation to process this data.

Who We Share Data With

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits, and the carrying out of performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with UK GDPR.

Data is shared with third parties for the following reasons: for the administration of payroll, for the administration of your Pension, and with our legal advisors when they provide advice.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the UK/European Economic Area/ Areas with Recognised Adequate equivalency without legal derogations.



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Information Security

The Little Sisters of the Poor have in place organisational and technical measures to provide security to your information. This includes restricted access to your personal information to those sisters, Staff and Volunteers whose role requires them to process your information to provide you with support.

How Long is your Information Kept

We only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Some data retention periods are set by the law.



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Record Type	Retention Period
Application Records (Application Form, CV, References, Right to work information, Identity documentation, vaccines and monitoring information)	1 year for unsuccessful applicants 8 years after leaving for successful applicants
Contracts, Agreements, and Terms and Conditions	8 years after leaving for successful applicants
Personnel and HR File, supervision and appraisals, disciplinary records, absence records, pay and benefits information, training records	8 years after leaving for successful applicants
CCTV Recordings	30 Days
Photos within HR file	1 year for unsuccessful applicants 8 years after leaving for successful applicants
Staff Surveys and Feedback	3 years
Audits	3 years
Staff accident / incident forms	3 years
Redundancy details, calculations of payments, refunds, notifications to the secretary of state	8 years

Record Type	Retention Period
Tax records	8 years
Tax Codes	8 years
Annual return of employees and director's expenses and benefits	8 years
Certificate of pay and tax deducted	8 years
Notice of tax code change	8 years



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Annual return of taxable pay and tax deducted	8 years
Records of pension deductions (including superannuation)	8 years
HMRC records relating to employment	8 years
Payroll and payroll control account	8 years
Clock Cards	2 years after audit

Automated Decision Making

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your Rights

Under Data Protection Legislation you have the following rights

1. You have the right to be informed about how and why your data is being used (Covered by this Privacy Notice)
2. The right to access the personal information we hold about you and obtain a copy of that information.
3. You have the right to rectification; ask us to correct any data we have which you believe to be inaccurate or incomplete by informing our Data Protection Officer.
4. You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for.
5. You may also request that we restrict processing if we no longer require your personal data for the purpose, we originally collected it for, but you do not wish for it to be erased.



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6. You have the right to data portability; you can request the personal information provided by yourself be exported in a universal format so it can be imported into another system
7. You have the right to object. If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. We will restrict all processing of this data while we look into your objection – please contact us to do so.
8. You have the right not to be subject to automated decision-making including profiling.

To exercise any of these rights please contact The Data Protection Officer for The Little Sisters of the Poor (Contact details in Contact Details and Who We Are and Contact Details Section)

You may need to provide adequate information for our staff to be able to identify you, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person inappropriately. We will always respond to your request as soon as possible and at the latest within one month.

Consent

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.



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Raising a Complaint

If you would like to make a complaint about how we have dealt with your request(s), or how we use your information please contact:

Greg Mintern

Data Protection Officer

Email (England): DPO@LSPLONDON.CO.UK

Email (Scotland): DPO@LSPSCOTLAND.COM

Post: Provincial Residence
Little Sisters of the Poor
St. Peters Residence
2A Meadow Road
South Lambeth
London SW8 1QH

If you are not satisfied with our response to your complaint, you are able to raise the issue and complain to our regulator, The Information Commissioner's Office (ICO), they can be contacted in the following ways:

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

Online: <https://ico.org.uk/global/contact-us/>