

Privacy Notice for Trainee Solicitor Recruitment

What is the purpose of this document?

Howes Percival LLP (“the Firm” or “we”) is a “data controller”. This means that we are responsible for deciding how we hold and use personal data about you. You are being sent a copy of this privacy notice because you are applying for work with us as a Trainee Solicitor. It makes you aware of how and why your personal data will be used (namely for the purposes of the recruitment exercise, and the offer of a Training Contract with the Firm (if successful)), and how long it will usually be retained for. It provides you with certain information that must be provided under UK data protection laws.

Data Protection Principles

We will comply with data protection law and principles, which means that your data 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 securely.

The kind of information we hold about you

Personal data 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.

In connection with your application for work with us, we will collect, store, and use the following categories of personal data about you:

- The information you have provided on our application form and any covering letter, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, education, qualifications, relevant experience, relevant information relating to skills that we are assessing (such as teamwork, organisation etc.).

- The information provided in response to specific requests as part of contextual analysis (more detail on this is set out below, and for clarity you are not required to provide this information and it will not prejudice your application if you choose not to provide it).
- Any information you provide to us during an interview or at the assessment centre and any notes taken by interviewers or assessors (including scores or opinions of suitability).
- Any information you provide to us or that we obtain in relation to the assessment process in the case of trainee solicitors, for example, legal/commercial test results, maths/numerical reasoning tests and presentations.
- If you attend an interview or are successful in your application, CCTV footage (at our Northampton and/or Leicester and/or Norwich offices) and details from our visitor signing in books at our premises.

We may also collect, store and use the following "special categories" of more sensitive personal data:

- Information about your race or ethnicity, status as a refugee or asylum seeker, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your Personal Data collected?

We collect personal data about Trainee Solicitor candidates from the following sources:

- You, the candidate.
- We may collect additional information from third parties including former employers or your current University or school of law (information will only be collected from former employers/Universities in relation to reference checks and only after we have informed you that we will be taking up such references).
- You must disclose to the Solicitors Regulation Authority ("SRA") any issue which may cause you not to meet the outcomes of the SRA Suitability Test in accordance with the SRA Assessment of Character and Suitability Rules 2019 whilst under any recognised period of training, also known as a Training Contract. This may require us to seek information from you about any spent or unspent criminal convictions and other matters including assessment offences, financial conduct and events or regulatory and disciplinary findings that may impact on your suitability and may require us to disclose personal data (including criminal offence and conviction data) to the SRA in accordance with our obligations as an authorised training provider. This will apply whether you are

to be offered a Training Contract to commence imminently or are given an offer of a Training Contract conditional on you completing to our satisfaction your Legal Practice Course or SQE.

- Your named referees, from whom we will ask to provide us with a reference about you. This may be from your current or former education providers or from former employers. This will generally include dates of employment, position held, reason for your employment ending (if it has), relevant experience and relevant performance assessment or if from an education provider to verify your performance during your degree, any Legal Practice Course or SQE (or equivalent) and to verify your suitability for a Training Contract with the Firm. Referees may also include other named persons who you have identified who know you and who may be asked to give references concerning your character and suitability for a Training Contract with the Firm.

How we will use Personal Data about you

We will use the personal data we collect about you to:

- Assess your skills, qualifications, and suitability for the role, including whether you will satisfy the SRA Suitability Test.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.
- Make a decision about your recruitment or appointment.
- Determine the terms on which you work for us
- Check you are legally entitled to work in the UK.
- Deal with funding arrangements for LPC, GDL or SQE (or equivalent) and to obtain information on your performance in respect of such courses.
- If you are applying to work in our Northampton, Leicester or Norwich offices, or attend our Northampton, Leicester or Norwich offices for interview, we have CCTV in operation at those offices. Broad details of our CCTV are below (and full details can be found in our CCTV policy):
 - At our Northampton office we have one camera that covers the entrance to our car park, giving a view of the barrier arm, key pad and intercom. A second camera covers the front entrance to our building and an area of the car park which is part of our demise.

- At our Norwich office the CCTV monitors the main reception entrance (inner and outer doors), the entrance to the car park and the alleyway from the car park to the main road. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park.
- At our Leicester office, the CCTV monitors the main entrance, the car park, and the full perimeter of the building. It primarily covers those visiting our offices (but is angled so as not to cover members of the public walking by) and cars entering our car park. Again, the CCTV operates for 24 hours a day, and this Data is continuously recorded.

Images from cameras can be viewed from the reception desk at the relevant office and in secure setting by authorised personal for a short period after (save if there is a legal basis for keeping footage longer, such as in the event of a criminal investigation).

It is in our legitimate interests to decide whether to appoint you to role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal data to decide whether to enter into a contract of employment or engagement with you, to comply with our legal obligations as a registered training provider and to comply with the SRA Education, Training and Assessment Provider Regulations 2019.

Having received your application form and any covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, you may be required to undertake a numerical reasoning test, which is administered by our third party supplier, currently, Informed Assessment Limited. We will use the information you provide to us at the interview and the results of the various assessments carried out prior to (in the case of the numerical reasoning test) or at the assessment centre, to decide whether to offer you the role. If we decide to offer you the role, we will then take up references in relation to you.

As part of assessing your suitability and making decisions regarding advancing your application and/or offering you the role, we use a third party provider to undertake contextual analysis using information regarding your background. Contextual analysis is used to highlight individuals whose achievements may not otherwise be fully recognised or understood, and therefore providing that information may enhance your application but your application will not be prejudiced should you choose not to provide it. Contextual analysis is only done with your express consent.

If we offer you the role this will be conditional on you being able to (and continuing to be able to) meet the outcomes of the SRA Suitability Test in accordance with the SRA Assessment of Character and Suitability Rules 2019. As a result, we will need to process any information relating to your suitability for the role which may cause you not to meet the outcomes of the SRA Suitability Test.

If we are funding your LPC and/or GDL or SQE course (or equivalent), then we will need to process your

data in order to put that into effect.

Your employment may (if you are likely to be required to undertake government contract work, which is likely) also be subject to your completion of a Baseline Personal Standard Security form, which contains a criminal conviction declaration form. It is currently a condition of our Government contracts that all new employees complete this form. If this changes we will let you know and if no longer necessary, will cease to carry out such checks. Further information on this and the other ways in which we process your data as an employee will be provided in the privacy notice that we issue to employees, workers and contractors if you are offered and accept a position with us.

If you fail to provide Personal Data

If you fail to provide data when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history, or suitability in accordance with the SRA's requirements), we will not be able to process your application successfully (for example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further).

As set out above, should you choose not to consent to contextual analysis and/or do not want to provide some or all of the information requested as part of that analysis, it will not prevent your application proceeding nor will it count against you when we undertake our assessment and make a decision regarding any role we may offer.

How we use particularly Sensitive Personal Data

"Special categories" of particularly sensitive personal data require higher levels of protection. This data includes the following information: race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation.

We will use your particularly sensitive personal data in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during the interview, or in relation to the assessment centre or any tests undertaken.
- We will use information about your race or national or ethnic origin, religious, or philosophical beliefs, or your sex life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We also use, only with your express consent, information you provide regarding your background (for example any refugee/asylum seeker status, whether you undertook paid employment during your full-time education, and if you were entitled to free school meals) for the contextual analysis explained above.

Information about Criminal Convictions

We envisage that we may process information about criminal convictions.

We may collect information about any criminal conviction history, spent or unspent, if you are applying for a position with us as a Trainee Solicitor. We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role and/or means you may not meet the SRA Suitability Test.

You may apply for early assessment if you are concerned about character and suitability issues to the SRA and this should be disclosed to the firm. The SRA Assessment of Character and Suitability Rules 2019 at Part 2, Rule 3 provide a non-exhaustive list of criminal conduct which may result in refusal to join the Roll.

As stated above, your employment may also be subject to your completion of a Baseline Personal Standard Security form, which contains a criminal conviction declaration form. This is currently a requirement for all of our government contract work, which you may be involved in during the course of any Training Contract.

Automated Decision-Making and Profiling

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We have set out above that we conduct contextual analysis, but only with your consent. This does constitute a form of profiling as it involves collecting information about you and analysing that information to assist with decision making. However, this is only done with your consent and does not produce any significant effects in and of itself, as it forms only a small part of the overall decision making process.

Data Sharing

Why might you share my Personal Data with third parties?

We will only share your relevant personal data with the following third parties for the purposes of processing your application:

- Your recruitment consultant or the recruitment consultant/search consultant that we have appointed,
- The SRA to deal with any issues relating to the SRA Suitability Test,
- Those third parties who are contracted to carry out assessments at the assessment centre, including those that carry out the numerical tests on our behalf (currently, Informed Assessment Limited),
- Our applicant tracking system, currently the Eploy system provided by ITS Software Systems Ltd),

- Our third party provider who conducts contextual analysis using your background information (only with your express consent), currently Rare Recruitment Limited,
- Any providers of the LPC, GDL or SQE or other relevant education provider,
- Your chosen referees,
- Any former employers named in your application.

We may also from time to time use recruitment platforms to manage our application and/or recruitment process. In doing so your personal data will be shared with the relevant provider of the recruitment platform.

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies and/or the UK data protection laws. We do not allow our third-party service providers to use your personal data for any other purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

How long will you use my personal data for?

If you are unsuccessful in your application for a Training Contract (then save as set out below), we will retain your personal data for a period of 9 months after we have communicated our decision.

We retain your personal data for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, unless you ask us to hold your personal data for longer, we will securely destroy your personal data in accordance with our data protection policy and any policies on retention of personal data.

If we wish to retain your personal data on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal data for a fixed period on that basis.

For successful candidates who accept the offer of a Training contract with us, we will retain the recruitment data (CV, application form, interview assessments/tests/notes etc) for the duration of your employment to the extent that it remains relevant to your employment (and possibly thereafter). Please see the privacy notice that we will issue to you as an employee for further information relating to this.

Rights of Access, Correction, Erasure, and Restriction

Your rights in connection with personal data

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

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected. Please note that we may need to verify the accuracy of the new personal data that you provide.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have exercised your right to object to processing (see below). Please note, however, that we may not always be able to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data 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 data for direct marketing purposes.
- **Request the restriction of processing** of your personal data in certain circumstances. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to you or to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our People Manager (Natalie Clarke) in writing.

Right to Withdraw Consent

In the limited circumstances where we have relied on your consent for the collection, processing and transfer of your personal data for a specific purpose (which will be rare), you have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact our People Manager (Natalie Clarke). Once we have received notification that you have withdrawn your consent, we will no longer process your personal data, unless we have a legitimate basis for doing so in law.

Data Protection Officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. Our Data Protection Officer is Hannah Steggles, Partner. She can be contacted on 0116 247 3520 or email hannah.steggles@howespercival.com. If you have any questions about this privacy notice or how we handle your personal data, please contact the Data Protection Officer. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

The Firm's Data Protection Officer is responsible for this Notice which was adopted on 8 May 2018 and revised last on 2 February 2026