

Privacy Notice

Company Name:	Protocol Education Limited ('the Company')
Company Contact details:	Data Protection Officer 99 Bridge Road East Welwyn Garden City Hertfordshire AL7 1GL dpo@supportingeducation.com
Document DP5	Privacy Notice (including for use on the company website)
Topic:	Data protection
Date:	1 st October 2018
Version:	1.2

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including Special Category personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.

1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include Special Category personal data) and will process your personal data for the purposes of providing you with work-finding services and related marketing. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases, we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal bases we rely upon to offer our work-finding services to you are:

- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you
- Your consent

b. Consent

The Company will seek your specific consent to process data relating to your health, our ability to undertake regular and ongoing status checks with the Disclosure and Barring Service and any criminal convictions. If you have opted-in we may also send you various company and sector news, career development advice and courses, and job alerts via email/ text. You can opt-out from receiving these at any time by clicking the link to the Company's Preference Service when you receive these communications from us and changing your preferences

c. Legitimate interest

This is where the Company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping work-seeker records up to date
- Providing work-finding services to you and our clients
- Contacting you to seek your consent where we need it
- Giving you information about similar products or services that you have used from us recently

d. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data. These include, but not limited to:

- To comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003
- Immigration and tax legislation
- To carry out pre-engagement vetting checks, including but not limited to:
 - To comply with the Safeguarding Vulnerable Groups Act 2006
 - To comply with the Department for Education statutory guidance (Keeping Children Safe in Education) to verify your physical and mental fitness to teach and/or work with children

- To comply with the Education (Health Standards) (England) Regulations 2003 to verify your suitability to work in regulated activity with children
- Verify your right to work

Our clients may also require this personal data, and/or we may need your data to enter into a contract with you.

If you do not give us the personal data we need to collect then we will be unable to continue to provide work-finding services to you.

e. Recipients of data

The Company will process your personal data and/or Special Category personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Named individual you provided for seeking a reference from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Your umbrella company (if you have chosen to use this option)
- Third parties which provide, host and/or support our IT systems and software (subject to appropriate security measures)
- Capita plc for the purposes of carry out DBS checks
- GOV.UK, the Disclosure and Barring Service and Department of Education for performing criminal records update checks, qualification checks, teacher sanction and restriction checks and the overall protection of vulnerable groups
- Teaching Regulation Agency and Education Workforce Council to perform teacher status checks
- HMRC for audit purposes and the provision of employment and payroll information
- Pension providers
- UK Government's Visas and Immigration and the Home Office for checking right to work status.
- Overseas criminal records agencies and law enforcement agencies if you have been resident outside of the UK in the last 5 years for at least 6 months
- Audit and accreditation providers, such as The Recruitment and Employment Confederation (REC) and the International Organization for Standardization (ISO)

The Company is part of a group of companies owned by Arthur BidCo Limited, known as Supporting Education Group. We may share your personal data amongst the group of companies in order that our associated companies can provide work-finding services and/or related services to you.

2. The Company has collected the following personal data on you:

Personal data:

- Contact details, CV, type of candidate, subject specialism, focus areas and work preferences when provided on job boards and/or LinkedIn
- References
- Client feedback
- Consultant notes
- Online activity specific only to the Company's web sites

Special Category personal data:

- Health information in accordance with the Education (Health Standards) (England) regulations 2003
- Criminal conviction and record checks strictly adhering to all established codes of conduct and processing

Source of the personal data: The Company sourced your personal data personal data:

- Former employer
- A referee whose details you provided to us
- Various Jobs boards and aggregators, such as Broadbean and Idibu, and LinkedIn
- Cookies

This information did not come from a publicly accessible source.

3. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

4. Data retention

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws require us to keep different data for different periods of time. For example, the Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after the date on which we last provide you with work-finding services.

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 6 years.

There is a legitimate interest to hold your personal data for no longer than 6 years after our work-finding service relationship ends.

Where the Company has obtained your consent to process your personal data and Special Category data, we will do so in line with our retention policy.

Where consent is not granted the Company will cease to process your personal data and Special Category personal data.

If you have any questions about our retention policy, you can email dpo@supportingeducation.com.

5. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and Special Category personal data you have the right to withdraw that consent at any time by contacting us using the details above. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please refer to our Cookie policy or visit www.allaboutcookies.org or www.youronlinechoices.eu. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

7. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

8. Links to external websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

9. Sale of business

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

10. Data Security

The Company takes every precaution to protect our users' information. Security measures include, but are not limited to, the use of firewalls and endpoint protection, browser certification technology, encryption, limited access principle, malware protection, and use of artificial intelligent based ransomware and exploit protection.

PRIVACY POLICY (TIER 4)

Document Control

Reference: **GDPR REC 4.1TP**

Issue No: **1.2**

Issue Date: **01/10/2018**

Page: **7 of 8**

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the “remember my details” function when that option is offered.

If you have any questions about the security at our website, you can email

dpo@supportingeducation.com

11. Changes to this privacy statement

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

12. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the Data Protection Officer using the details above.

You also have the right to raise concerns with Information Commissioner’s Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

If you have any questions or if you feel that we are not complying with the terms of this privacy policy please do contact us by e-mailing us at the following address dpo@supportingeducation.com inserting the words ‘Privacy Policy Grievance’ in the heading.

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Page: 8 of 8

Document Owner and Approval

The DPO is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the company intranet.

Signature: S Bryce

Date: 22/05/2018

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	S Bryce	22/05/2018
1.1	Change to SE Group only	S Bryce	01/10/2018