

Company Name:	Simply Education Ltd ('the Company')
Company Contact details:	Bedford Heights, Manton Lane, Bedford, MK41 7PH
Document DP5	Privacy Notice (including for use on the company website)
Topic:	Data protection
Date:	12 th April 2019
Version:	3

The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive 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 job 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.

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1. Collection and use of personal data

a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. 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. The Company also processes personal data for applicants for internal job vacancies.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” or contacting us directly when you receive these communications from us.

In some cases, we may be required to use your data for the purpose of investigating safeguarding allegations, 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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Legitimate interest will be relied on during the registration process up until the worker seeker is met for the final face to face interview.
- Consent will be relied on from the point of the final face to face interview and to process any sensitive data for any work seekers
- Legitimate will be relied on during the recruitment process for internal job applicants
- Legal obligation will be relied on where processing is necessary to comply with Employment law, Conduct of Employment Agencies and Employment Businesses Regulations 2003, HMRC and associated national minimum wage, social security and tax legislation and any other statutory guidance relevant to our industry

b. 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;
- Managing the recruitment process of internal job applicants

c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) 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 personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

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

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Prospective employers when providing employment references
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce work seekers to
- The Recruitment and Employment Confederation
- BM trade in connection with ISO auditing
- Legal Advisers working on behalf of Simply Education Ltd
- The Disclosure and Barring Service
- Access Personal Checking Services Ltd (APCS)
- The Teaching Regulations Agency
- Government, law enforcement agencies and other regulators e.g the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,

2. Information to be provided when data collected not from the data subject

Categories of data: The Company collects and processes a range of personal data about you this includes:

- *Personal data:* Full name including any previous surnames
- Photo
- Date of birth
- Contact details, including telephone numbers, email address and postal address
- Copies of proof of address documents including but limited to Bank Statements, Utility Bills, Mortgage Statements and HMRC Documents
- Experience, training and qualifications
- Passport
- Driving Licence
- Birth Certificate
- Change of Name Documents
- Information obtained from the TRA (where applicable)

- CV
- Documents containing proof of National Insurance number
- Information regarding right to work in the UK
- Obtaining, providing and verification of references
- Payroll information
- Information regarding your next of kin or emergency contact
- Records of any CPD observations carried out via Simply Education

Sensitive personal data:

- Disability/health condition relevant to the role
- Criminal convictions, including DBS, DBS Update Service, overseas police clearances (where applicable) and Children's Barred List checks

Source of the personal data: The Company sourced your personal data/sensitive personal data from:

- During registration
- A Job Board
- A recruitment outsource processor
- A Referral
- Cookies listed in section 7

This information did not come from a publicly accessible source.

3. Overseas Transfers

The Company will not 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. 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 may also 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.

Where the Company has obtained your consent to process your personal and sensitive personal we will do so in line with our retention policy a copy of which is attached. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal and sensitive personal data.

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 sensitive personal data you have the right to withdraw that consent at any time by contacting our Compliance Director, HR Manager or Training and Operations Manager. 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.

The table below explains the cookies we use and why.

Name of Cookie	Purpose	Strictly Necessary
EU Cookie Compliance	To ensure you agree with our cookie compliance	Yes
_ceg.s, _ceg.u, _ga, _gat, _gid	For Analytics	Yes
PHPSESSID	Session ID	Yes
referred	To recognise where your ip is located	No

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, please contact our marketing department. Please note that in a few cases some of our website features may not function if you remove cookies from your browser.

Google Analytics

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

The analytics service(s) used by Our Site use(s) the following Cookies:

Name of Cookie	First / Third Party	Provider	Purpose
_ceg.s	Third Party	Google	Google Analytics
_ceg.us	Third Party	Google	Google Analytics
_ga	Third Party	Google	Google Analytics
_gid	Third Party	Google	Google Analytics
IDE	Third Party	Google	Google Analytics

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 contains 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 and every 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

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our Site. Steps we take to secure and protect your personal data include: Limiting access to our site, use of passwords and forced password changes and SSL encryption

Only employees who need the information to perform a specific job (for example, consultants, administrators 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 Adam Shulman adam@simplyeducation.co.uk

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 Our Compliance Director, HR Manager or Training and Operations Manager by telephone on 01234 216199 or by post at Simply Education Ltd, Bedford Heights, Manton Lane, Bedford, MK41 7PH

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.

HRPP053 HR PROCESS POLICY & PROCEDURE
RECORD RETENTION

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 ISSUE DATE: 29/10/2018
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Records will be deleted from the Company's systems on a monthly basis and at this point employees will be unable to access these records. Due to the Company's system backups, records will be permanently deleted from all systems a maximum of 6 months after the deletion date.

Record	Minimum retention period	Storage Method	Disposal Method
Assessments under health and safety regulations and records of consultations with safety representatives and committees	Permanently	Electronic	E-deletion
		Hard copy	Secure Shred
Accident books, accident records/reports	3 years from the date of last entry	Electronic	E-deletion
		Hard copy	Secure Shred
Statutory Maternity/Paternity/Adoption Pay records, calculations, certificates (Mat B1s) or other medical evidence.	6 years after the end of the tax year in which maternity period ends	Electronic	E-deletion
		Hard copy	Secure Shred
Parental leave	18 years from the birth of the child	Electronic	E-deletion
		Hard copy	Secure Shred
Statutory Sick Pay records, calculations, certificates, self-certificates	6 years after the end of the tax year in which sickness period ends	Electronic	E-deletion
		Hard copy	Secure Shred
Application forms, CV's and interview notes (for unsuccessful candidates and employees)	1 year Successful job applicant's documents will be transferred to the personnel file in any event	Electronic	E-deletion
		Hard copy	Secure Shred
Company email communications	1 year after the sent or received date	Electronic	E-deletion
		Hard copy	Secure Shred
Employees personnel files and training records including; application form, appraisals, bonus commission and KPI information and structures, consent form, change of circumstances form, contract amendments/promotions, CV, DBS,	6 years after employment ceases	Electronic	E-deletion
		Hard copy	Secure Shred

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employee and employer correspondence, eyecare reimbursement form, disciplinary documents, driving license, most recent driving license check, exit interview form, flexible working documentation, gym membership terms and payments, interview notes, investigation documents, leave and absence records, leaver documentation, medical questionnaire, meeting notes, new starter checklist, offer letters, one-to-one documents, other personal documentation provided by the employee, P45, performance related documents, presentations, proof of address, proof of national insurance, probation checklists and reviews, references, right to work documentation, salary information, suspension details, training documents, terms and conditions of employment, time keeping records, most recent update service check, working time records, workstation self-assessment, redundancy details, calculations of payments.

Swipe card - log in and out records

3 months from the date of entry

Electronic

E-deletion

Hard copy

Secure Shred

Candidate personnel files including, File Check list, DBS/CRB, application pack, certificate of incorporation, correspondence, correspondence (confidential)CPD, deed poll, divorce certificate, data protection form, driving license, fit to work notes , EWC checks, GPS agreements, interview questions, letter of good conduct, List 99/Children’s barred list checks, marriage certificates, Medical questionnaire, naric, NCTL Check, NHS medical cards, qualification checks, overseas police check, payment receipts, payroll registration information, photo, proofs of address, , qualifications, references, suitability forms, update service checks, refunds, payment receipts, OCT check, Paediatric First Aid Certificate, Postage Refund Receipt, Prevention Training Certificate, Proof of Payscale, Reference Tracking Form, Safeguarding

1 year from the last date of supply/introduction

Electronic

E-deletion

Hard copy

Secure Shred

Certificate, Student Exclusivity Agreement, Waiver			
Terms of engagement for candidates	6 years from the last date of supply/introduction	Electronic Hard copy	E-deletion Secure Shred
Candidate records held relating to right to work in the UK, Birth certificate, Passport, EU ID card, Proof of National insurance number, visa, work permit information, certificate of naturalization and citizenship certificate, Adoption Certificate.	2 years from the last date of supply/introduction	Electronic Hard copy	E-deletion Secure Shred
Record relating to candidate assignments, assignment dates, feedback and any safeguarding incidents, Candidates full name and any maiden names, date of birth and National insurance number.	6 years from the last date of supply/introduction (references will not be able to be given after this date)	Electronic Hard copy	E-deletion Secure Shred
Hirer records, terms or business with clients	6 years from the last date of supply/introduction	Electronic Hard copy	E-deletion Secure Shred
Hirer records, vacancy details and booking confirmations	2 years from the last date of supply/introduction	Electronic Hard copy	E-deletion Secure Shred
Candidate contact information- Telephone number, Mobile phone number, email address, CV, details of subject and specialisms and type of qualification.	1 year from the last date of supply/introduction or registration date, whichever is the later. (unless consent is given by the candidate to keep information on file)	Electronic Hard copy	E-deletion Secure Shred
Senior executives' records (that is, those on a senior management team or their equivalents)	Permanently for historical purposes	Electronic Hard copy	E-deletion Secure Shred
Purchase invoices and Supplier Documentation - Payments cash book or record of payments made, Purchase Ledger, Invoice – Revenue, Petty Cash Records	6 years from the end of the financial year in which the transaction was made	Electronic Hard copy	E-deletion Secure Shred
Purchase invoices and Supplier Documentation - Invoice – Capital Items	10 years	Electronic Hard copy	E-deletion Secure Shred

Fully vetted,
local, reliable
 teachers & support staff

Purchase invoices and Supplier Documentation – Successful quotations for capital expenditure	Permanently	Electronic Hard copy	E-deletion Secure Shred
Income/Monies Received – Bank paying in counterfoils, bank statements, remittance advices, correspondence re donations, bank reconciliations	6 years from the end of the financial year in which the transaction was made	Electronic Hard copy	E-deletion Secure Shred
Income/Monies Received – Receipts Cash Book, Sales Ledger	10 Years	Electronic Hard copy	E-deletion Secure Shred
Income/Monies Received – Deeds of covenant/Gift Aid Declarations	6 years after the last payment made. Twelve years if payments outstanding or dispute regarding the deed	Electronic Hard copy	E-deletion Secure Shred
Income/Monies Received – Legacies	6 years after the estate has been wound up	Electronic Hard copy	E-deletion Secure Shred
Payroll Documentation - Income tax records re employees leaving, notice to employer of tax code (P60), Annual return of employees and director's expenses and benefits (P11D), Notice of tax code change, Annual return of taxable pay and tax deducted, Records of pension deductions (including superannuation), Payroll and payroll control account	6 years plus the current year	Electronic Hard copy	E-deletion Secure Shred
Insurance Documents – Policies	3 years after lapse	Electronic Hard copy	E-deletion Secure Shred
Insurance Documents – Claims correspondence, accident reports and relevant correspondence	3 years after settlement	Electronic Hard copy	E-deletion Secure Shred
Insurance Documents - Employers liability insurance certificate	40 years	Electronic Hard copy	E-deletion Secure Shred
Trust deeds and rules	Permanently	Electronic Hard copy	E-deletion Secure Shred
Trustees/ directors/governor minutes or meetings and decisions	Permanently	Electronic	E-deletion

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		Hard copy	Secure Shred
Works council minutes	Permanently	Electronic	E-deletion
		Hard copy	Secure Shred
Annual accounts and annual review, major agreements of historical significance, investment certificates, investment ledger, fixed assets register	Permanently	Electronic	E-deletion
		Hard copy	Secure Shred