

TimePlan Education Group Ltd (the Company) is a recruitment business and recruitment agency which provides work-finding solutions and 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.

This recruitment privacy notice (Privacy Notice) explains what data we collect about you so that we can provide you with work-finding services. The Privacy Notice also outlines how we retain your data and how we may share information about you.

The Privacy Notice outlines how we process personal data (including sensitive personal data) in order for us to provide these services – in doing so, the Company acts as the data controller. The data controller is the managing entity which determines the purposes for which and the way in which your personal data is processed.

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 some from another source, such as your CV from 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 the terms of the following statement.

### **Collection and use of personal data**

#### **a. Purpose of processing and legal basis:**

The Company will collect your personal data (which may include special categories of personal data) and will process your personal data for the purposes of providing you with work-finding services in line with this Privacy Notice. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our database, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

On some occasions 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.

We must have a legal basis to process your personal data. The legal basis we rely upon to offer these services to you are:

- Legitimate interest
- Consent.

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 interest(s) is/are as follows:

- managing our database and keeping work seeker records up to date
- providing work-finding services to you and recruitment solutions for our clients
- contacting you to seek your consent where we need it
- giving you information about similar products or services to those that you will have used from us recently.

**b. Recipient(s) of Data**

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

- Disclosure and Barring Service (DBS)
- The Teacher Regulation Agency (TRA)
- Education Workforce Council (EWC) Wales, if applicable
- Online right to work checks through a third-party service providers, such as the Home Office
- Previous and current employers to gain references
- Client schools and education institutions we work with for work-finding services.

**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 Business Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements). Our clients may require this personal data, and 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 in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

**Overseas Transfers**

The Company may transfer only the information you provide to us to countries outside the U.K. and/or 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.

**Data Retention**

The Company will retain your personal data only for as long as is necessary. Different

laws require us to keep different data for different periods of time.

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.

Once the Company has obtained your consent to process your personal and sensitive personal data, the data we will require includes:

### **Personal Data**

- Name
- Date of birth
- CV / resume
- Contact details, including telephone number, email address and postal address
- Photograph
- Proof of Address, including financial or utility statements
- Experience, training and qualifications
- Teacher Registration Number (TRN) / Teacher registration Document(s)
- National Insurance Number
- Passport and/or visa / Biometric Residence Permit (BRP)
- National Identity Card, if applicable
- Driving Licence
- Birth Certificate and/or marriage or Civil Partnership certificate and/or other change of name documentation
- Bank account detail.

### **Sensitive Personal Data**

- Disability/health condition relevant to the role
- Ethnicity and next of kin details (non-compulsory)
- Criminal conviction through Disclosure and Barring Service (DBS), and Overseas Police Clearance, if applicable
- Ongoing online DBS Update Service checks, if applicable
- Online Barred List checks (as part of the DBS check)
- Online status checks against qualifications and sanctions through the Teacher Regulation Agency (TRA) for teachers in England and/or through the Education Workforce Council (EWC) for candidates in Wales

- References from previous employers.

We will process this data in line with our retention policy. 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 data and sensitive personal data.

### **Your Rights under the GDPR**

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

- The right to be informed about the personal data the Company processes for you
- The right of access to the personal data the Company processes for 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 David Millard, Data Protection Officer (DPO), Empowering Learning Ltd, 2<sup>nd</sup> Floor, Longbow House, 20 Chiswell Street, London, EC1Y 4TW.

Email: [david.millard@timeplan.net](mailto:david.millard@timeplan.net)

### **Third-party Data Sharing**

Your personal data will primarily be assessed and accessed by our employees in direct relation to the recruitment processes. This will include the interviewer, compliance officers, IT team, finance team, and HR team, where applicable. We also share information with companies within our group of companies (the Empowering Learning Group) where required for recruitment processing and training and also with third parties as outlined below:

- To process your application and undertake relevant checks in relation to safer recruitment checks for schools.
- We use third-party service providers to complete recruitment checks. Such as right to work checks and regulatory body checks. In doing so, we require that they take appropriate security measures to protect your data.

- We may share information with regulatory and government bodies and / or law enforcement agencies if / or as required and for the legal protection of our legitimate interest in compliance with applicable laws and procedures.
- We may share information for the purposes of reporting and analysis.
- We may share your information to our advisors or prospective purchaser, should the Company be sold or integrated within another business.

## **Security**

Data security is of great importance to the Company. To protect your data, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your data against being lost, used or accessed in any unauthorised way.

We endeavour to do our best to protect your personal data and only allow access to those employees and third parties who have a legitimate business reason to access.

## **Complaints or Queries**

If you have questions or wish to complain about this Privacy Notice or any of the procedures set out in it, please contact: David Millard, Data Protection Officer (DPO), Empowering Learning Ltd, 2<sup>nd</sup> Floor, Longbow House, 20 Chiswell Street, London, EC1Y 4TW. Email: [david.millard@timeplan.net](mailto:david.millard@timeplan.net)

You also have the right to raise concerns with Information Commissioner's Office on [+44 \(0\) 303 123 1113](tel:+44203031231113) 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.