

Company Name:	Mount Stephen Education ('the Company')
Company Contact Details:	dpo@mountstepheneducation.co.uk
Document	Privacy Notice
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The Company is a recruitment business and recruitment agency which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of 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. We will comply with current data protection laws at all times.

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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 special categories of 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.

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” when you receive these communications from us.

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

- Your consent
- 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

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 is/are as follows:

- Sourcing and storing information about individuals who are looking for temporary or permanent work in the UK that would be suitable for the type of roles that our clients notify us about
- Storing and exchanging information about work seekers so we can provide work finding services to the individual including sending their information to clients where they have demonstrated an interest in doing that particular type of work but not expressly consented to passing on their CV, and so we can fulfil contractual obligations with the end client.
- Contacting individuals to seek consent where we need it
- Storing and exchanging information about clients so we can fulfil their recruitment needs
- Contacting individual clients and work seekers with information about similar products or services that they have used from us
- Managing a secure database and keeping work seeker and client records up to date
- Using client or work seekers data for marketing, fraud prevention, and disclosing information about possible criminal acts or security threats to the authorities

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 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.

d. Recipient/s of data

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

- Clients that we introduce or supply individuals to including but not limited to; any education establishment and training provider
- Candidates' former or prospective new employers that we obtain or provide references to
- The Recruitment and Employment Confederation of which Mount Stephen Education is a member
- Any other third parties who carry out audits to ensure that we run our business correctly
- Payroll Service providers who manage our payroll on our behalf
- Any umbrella companies that we pass candidate data to
- Potentially other recruitment agencies if we work as second tier suppliers
- Our insurers
- Our CRM providers and CRM providers of our payroll service providers
- Any public information sources and third party organisations that we may use to carry out suitability checks on work seekers including but not limited to; Companies House, the Disclosure and Barring Service (DBS), Education Workforce Council (EWC), and teacher services by the department of education.
- Government, law enforcement agencies and other regulators including but not limited to; the police, Home Office, HMRC, Employment Agencies Standard Inspectorate (EASI), and Local Authority Designated Officers (LADOs)
- Any other organisations that an individual asks us to share their data with

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

Categories of data: The Company may have collected the following personal data on you:

Personal data included but not limited to:

- Name, address, mobile/telephones number, and email address
- National insurance no.
Employment History
- Any other additional information displayed on your CV

Source of the personal data: The Company sourced your personal data from a third party service and a publicly accessible source to which you are registered or subscribed:

- From jobs boards: Reed, CV Library, Indeed
- LinkedIn

If you decide to register with us or (at the latest stage) you are successful in securing an interview with us we will legally be required to request special categories of information on you.

Special categories of personal data included but not limited to:

- Health information including whether you have a disability
- Criminal conviction(s)
- Reference
- Confirmation of right to work

3. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the UK 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.

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 are required to keep your records relating to the right to work in the UK 2 years after employment or the engagement has ended alterable and working time records including your 48 hour opt out notice annual leave/holiday records 2 years from the time they were created.

Additionally, 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 special categories of personal data, we will do so 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.

The Company processes some sensitive personal data, and as a result some of this information may not be deleted, keeping in line with safeguarding.

Where we no longer need to keep all of the personal data on an individual we will apply a minimising process and retain limited data for identification purposes only and all other data will be erased or destroyed securely.

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 dpo@mountstepheneducation.co.uk. 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.

7. Cookies

Mount Stephen education is an employment agency and an employment company. The information that passes through our website has been actively submitted by both work seekers and clients/potential clients. This information is used to effectively recruit for our clients/potential clients, and to find related opportunities for work seekers.

Our website does not use cookies, tracking information, or google analytics. However, if in the future we update our website to include any of these then we will release a website privacy statement.

8. Login 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.

9. 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 and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

10. 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. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

11. Data Security

The Company takes every precaution to protect users' information. The company uses secure databases with limited access features and use of passwords changed regularly. The company also has comprehensive Anti Virus software installed on necessary devices.

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@mountstepheneducation.co.uk.

12. 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.

13. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact:

dpo@mountstepheneducation.co.uk

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