Privacy Notice

Company Name:	Supply Desk Limited ('the Company')
Company Contact Details:	Data Protection Lead dpl@supplydesk.co.uk Data Protection Officer dpo@supplydesk.co.uk
Document DP1	Privacy Notice (when personal data is obtained from the data subject)
Topic:	Data protection
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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 jobs board or social media. 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 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.

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.

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.

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:

- 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. 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 interest(s) is/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.

It is in the legitimate interests of all parties involved – the Company, the candidate and the client – that the Company can process personal data.

c. Statutory/contractual requirement

The Company has certain legal and contractual requirements to collect and process personal data including:

- to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (as amended);
- employment, immigration and tax legislation;
- in order to enter into a contract with you to provide work-finding services;

- safeguarding requirements (including the pre-engagement vetting checks[1] including:
    - verifying your physical and mental fitness to teach and work with children[2];
    - an enhanced DBS with barred list check, in order to verify your suitability to work in regulated activity with children[3]; and
    - verifying 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 personal data we need to collect we may not be able to continue to provide work-finding services to you.

d. Consent

The Company will seek your specific consent in order to process data relating to your health and any criminal convictions.

e. Recipient/s of data

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

- Client schools to whom we may introduce or supply you with whom we may share personal data including:
    - information required for the single central records (including vetting checks);
    - references;
    - information relating to health if relevant to the role and in order that the school can consider whether any reasonable adjustments are necessary in order that you can work in the role.[4];
    - criminal records (unfiltered convictions, cautions, reprimands and warnings – both spent and unspent);
    - safeguarding information including investigations and substantiated safeguarding allegations; and
    - other personal data reasonably required by clients, or relevant to the role.

- Former employers (or other individuals whose details you have provided to us) from whom we may seek references.

- Payroll service providers who manage payroll on our behalf or other payment intermediaries to whom we may introduce you.

- Our insurers and financiers.

- Your Umbrella Company (if this is your chosen payroll option).

- Other recruitment agencies in the supply chain.

- Third parties which provide, host and support our IT systems and software (subject to appropriate security measures).

- Third parties in order to carry out the necessary vetting checks including:

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1 Refer to Department for Education statutory guidance: Keeping Children Safe in Education

2 Education (Health Standards) (England) Regulations 2003

3 Safeguarding Vulnerable Groups Act 2006

4 Equality Act 2010

- Former employers for the purposes of applying for references.
- An authorised body for the purposes of carrying out DBS checks.
- The Disclosure and Barring Service for the purposes of performing criminal records update checks.
- Teaching Regulation Agency in order to perform teacher status checks.
- Health professional for the purposes of assessing your physical and mental fitness to work in a school.
- Teachers' Pensions' Online Barred List Checker – Barred list.
- UK Visas and Immigration and the Home Office for checking right to work status.
- Overseas criminal records agencies (if you have not been resident in the UK).

- Government, law enforcement agencies and other regulators e.g. the Police, Home Office, Employment Agencies Standards Inspectorate, Local Authority Designated Officers.

- Third parties who carry out audits to ensure compliance with current legislation.

- Just Teachers Limited is part of a group of companies owned by Education Placement Group (EPG). We may share your personal data with associated recruitment businesses within the EPG group of companies (including Supply Desk Limited) in order that our associated companies can provide work-finding services to you.

2. Personal data collected from other sources

The Company may have collected personal data relating to you from other sources, in addition to the information that you have provided to us directly. Data obtained in this manner may include:

Personal data:
- Name, address, mobile no., email
- National insurance no.
- Nationality (through right to work check)
- CV
- Work history
- qualifications
- Information shared with us by LADOs or the police
- References
- Teacher status (with TRA)
- Immigration status
- Client feedback

Sensitive personal data:
- Health information including whether you have a disability
- Criminal conviction and barred list

The Company may have sourced your personal data/sensitive personal data from:
- Jobs boards and aggregators including Indeed and Logic Melon
- Applicant processing and job posting platforms
- Social media including LinkedIn
- A former employer
- A referee whose details you previously provided to us
- DBS authorised body

- Teachers Regulations Authority
- Cookies (please see the Cookie Policy)
- LADOs or the police
- Client schools

This information does not come from a publicly accessible source.

3. Overseas Transfers

The Company may transfer the information you provide to us to countries outside the UK / 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 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 special categories of your 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 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 sensitive personal data you have the right to withdraw that consent at any time by contacting:

Data Protection Lead
dpl@supplydesk.co.uk
Data Protection Officer
dpo@supplydesk.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.

6. Automated decision-making

We do not use automated decision-making or profiling.

7. 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.

8. 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.

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.

11. Data Security

The Company takes every precaution to protect our users' information. Our data security measures include firewalls, browser certification technology, encryption, limited access and use of passwords.

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:
Data Protection Lead
dpl@justteachers.co.uk
Data Protection Officer
dpo@ justteachers.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:
Data Protection Lead
dpl@supplydesk.co.uk
Data Protection Officer
dpo@supplydesk.co.uk

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.