



Privacy Policy

The GDPR is Europe's new framework for data protection laws. It replaces the previous 1995 data protection directive, which current UK law is based upon. The new regulation starts on 25 May 2018. It will be enforced by the Information Commissioner's Office (ICO).

Central Employment is committed to protecting and respecting your privacy. This notice sets out the basis on which any personal data we collect from you, or that you provide us, will be processed by us.

The name and contact details of our organisation

Central Employment (North East) Limited will be what is known as the 'Controller' of the personal data you provide to us. Central Employment registration number is 2115676 and our registered address is 34 - 36 St Marys Place, Newcastle upon Tyne, NE1 7PQ.

The name and contact details of our representative & data protection officer

Louise Denyer will be what is known as the 'Data Protection Officer' of the personal data you provide to us. Louise can be contacted at Central Employment on 0191 2324816 or by email at enquires@centralemployment.co.uk

The purposes of the processing

We are a recruitment agency and recruitment business as defined in the Employment Agencies and Employment Business Regulations 2013. We collect personal data on individuals to allow us to operate our business for the following general purposes:

- Staff administration
- Advertising, marketing & public relations
- Accounts & records
- Administration and processing of work-seekers personal data for the purposes of work-finding services

The lawful basis for the processing

There are several lawful reasons we may process your personal data under the GDPR. These include:

- The individual has given their consent to the processing of their data for a particular purpose;
- Processing is necessary in relation to a contract to which the individual has entered into or because the individual has asked for something to be done so they can enter into a contract;
- Processing is necessary because of a legal obligation that applies to the data controller (except an obligation imposed by the contract);
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

The legitimate interests for the processing

Central Employment provide work finding services to both candidates and clients as part of our business. We process personal data in order to be able to provide these services – we need to check identity of candidates, their right to work and qualifications as well as process pay and manage entitlement to certain statutory rights. It is in the legitimate interests of all parties involved – Central Employment, the work seeker and the client – that Central Employment can process this data.

There are three main criteria that we will meet when using legitimate reasons to process your personal data under the GDPR. These are:

- Central Employment need to process the information for our own legitimate interest or for those of a third party to whom we may disclose the data
- Our legitimate interests are balanced against the individual's interests. Where there is a serious mismatch between competing interests, the individual's legitimate interest will take priority; and
- Any processing under the legitimate interest condition will be fair and lawful and compliant with all data protection principles.

The categories of personal data obtained

In order to provide the best possible employment opportunities that are tailored to our candidates, we need to obtain and store certain information. We only ask for details that will genuinely help us to help candidates find a new role and to remain legally compliant.

- Contact details
- Pay details
- Qualifications
- Employment history
- Ethnicity
- Disability details
- Medical details
- References
- Driving Licence details
- RTW eligibility
- Client specific paperwork
- Interview notes
- Other relevant information you may choose to share

Certain data is classified as 'sensitive personal data' where appropriate, and in accordance with local laws and requirements. This will include data about;

- Your racial or ethnic origin
- Your political opinions
- Your religious beliefs or other beliefs of a similar nature
- Your membership or non-membership of a Trade Union
- Your physical or mental health condition
- Your sex life
- Any commission or alleged commission of any offence, or any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings

We need you to provide your consent to us processing your sensitive personal data during your engagement with us. We will ask you to sign a Data Protection Consent Form to confirm this.

If you are looking for employment or have posted your professional CV information on a publically available data platform (e.g. job board or professional networking site), your publically available personal data may be used to provide our recruitment services to you, share that information with prospective employers (with your consent) and assess your skills against our live vacancies. During the job offer process, your potential employer may also want to confirm your references, qualifications and criminal record, to the extent that this is appropriate and in accordance with the law. We need to request/hold this data so that we can help you and our clients with our recruitment services.

If you are a Central Employment existing client, we need to collect and use information about you, or individuals at your organisation, in the course of providing you with our recruitment services. This can

include finding candidates to fill your roles. If you are a Central Employment potential client, we will source our information from you from publically available sources.

We collect a limited amount of data from the users of our website which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the most popular referrers and website responsiveness. You can read more about this in our Cookies Policy.

The recipients or categories of recipients of the personal data

As required under GDPR, we will only share your information to prospective employers and with your express consent.

Unless you specify otherwise, we may also share your information with any of our group companies and associated third parties such as our service providers where we feel this will help us to provide you with the best possible service and we have the appropriate processing agreement in place.

We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

The details of transfers of the personal data to any third countries or international organisations

Providing Information to Third Parties

In some cases, we are required by law to pass your data on to a third party. This will apply to instances such as setting up a workplace pension scheme. If there are no grounds in data protection law for us to pass your personal data on to a third party, we must obtain your consent before passing on your details. We will contact you to obtain your consent if this is necessary.

The retention periods for the personal data

Under new data protection regulations (GDPR), we are required to keep the data we hold accurate and, where necessary, up to date. As such, we will make an effort to regularly communicate with you to ensure your data is up to date and accurate.

We will delete candidate personal data from our systems if we have not had any meaningful contact with you for two years (or for such longer period as we believe, in good faith, that the law or relevant regulators require us to preserve your data). After this period, whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose of which it was collected for.

- 2 years post-campaign – Personal data
- 3 years post-employment – Bank Details
- 5 years post-employment – Contact Details
- 6 years post-employment – Tax Details
- 75 years post-employment – Pension Details

We will consider there to be meaningful contact with you if you submit your updated CV onto our website, apply for jobs with us or we receive an updated CV from a job board. We will also consider it meaningful contact if you communicate with us about potential roles, either by verbal or written communication.

Whilst we will endeavour to permanently erase your personal data once it reaches the end of its retention period or where we receive a valid request from you to do so, some of your data may still exist within an archive system. While certain details may still exist on an archive system, this cannot be readily accessed by any of our operational systems, processes or staff.

The rights available to individuals in respect of the processing

As your employer/contractor, we need to hold your personal data to enable us to operate your contract of employment/contract for services. In holding your personal data, we will comply with the eight data protection principles which require that your data must be;

- Processed fairly and lawfully.
- Processed for limited purposes and in an appropriate way.
- Adequate, relevant and not excessive for the purpose.
- Accurate.
- Not kept longer than necessary for the purpose.
- Processed in line with individuals' rights.
- Secure.
- Not transferred to people or organisations situated in countries without adequate protection.

Your Rights

You have the right to:

- Request access to any personal data we hold about you.
- Prevent the processing of your data for direct-marketing purposes.
- Ask to have inaccurate data held about you amended.
- Prevent processing that is likely to cause unwarranted substantial damage or distress to you or anyone else.
- Object to any decision that significantly affects you being taken solely by a computer or other automated process.

The right to withdraw consent

If you have given consent to the processing of your personal data you can withdraw your consent. When you withdraw your consent to processing, that withdrawal applies only to personal data collected by your consent. You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. If you wish to access your data at any time by making a 'subject access request' (SAR) to our Data Protection Officer. The request should be fulfilled within 30 days.

The right to lodge a complaint with a supervisory authority

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to www.ico.org.uk/concerns (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

The source of the personal data

We may obtain candidate information from any number of locations:

- When you register with us in our office
- When you register with our website or apply for jobs via our website
- When you correspond with us by phone, email or otherwise
- When you register your CV on a job board and it matches the skills we're looking for
- When you apply for one of our jobs via a job board
- When you are referred by a friend / colleague
- Your personal profile (publically available)

When we obtain your information from external sources such as LinkedIn, corporate websites and job boards we will inform you, by sending you this privacy notice, within a maximum of 30 days of collecting the data of the fact we hold personal data about you, the source the personal data originates from, and for what purpose we intend to retain and or process your personal data.

There are two main ways in which we collect client data:

- Directly from you
- From third parties such as candidates, online job boards, LinkedIn and networking.

The details of whether individuals are under a statutory or contractual obligation to provide the personal data

During your employment with Central Employment you will be under a statutory or contractual obligation to provide some of your personal data. If you fail to provide any of the personal data we request for our legitimate business interests it may result in the termination of your employment and or we will be unable to provide you with our full recruitment service.

The details of the existence of automated decision-making, including profiling

Central Employment do not use any automated decision-making or profiling with the data we receive from you. All of the personal data we hold about you will be processed by our staff, and accessed by our secure internal HR recruitment software. We take all reasonable technical and organisational precautions to ensure that your personal data is processed securely, to prevent the misuse or loss, prevent unauthorised access to or alteration of your personal data.

Changes to our privacy notice

Any changes we make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy notice.

Other websites

This website contains links to other websites. Central Employment is not responsible for the privacy policies or practices of any third party.

Contact

Questions, comments or requests regarding this privacy notice are welcomed and should be addressed by email to enquiries@centralemployment.co.uk