

## **CLASSROOM TEACHERS LTD PRIVACY POLICY**

Classroom Teachers Ltd (“the Company”) is a recruitment business which provides work-finding services to its clients and work-seekers (“candidates”). The company must process personal data, including Special Category personal data, in order to provide these services, in doing this, the company acts as a data controller.

You may give your personal details directly to us via an application form, registration form, our website, or we may collect them via an external source such as a job board. The company must have a legal basis to process your personal data at all times.

In 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.

If you feel that this company is not abiding by its posted privacy policy, you should first contact Andy Skarpellis by email: [andy@classroomteachers.co.uk](mailto:andy@classroomteachers.co.uk)

## **INFORMATION COLLECTION AND USE OF PERSONAL DATA**

### **Purpose of processing and legal basis**

The Company will collect your personal data, which may include Special Category personal data, and will process your personal data for the purposes of providing you with work-finding services and related marketing. This includes for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, submitting you for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

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 within certain industry standards.

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

### **Consent**

The Company will seek your specific consent to process data relating to

- Your health
- our ability to undertake regular and ongoing status checks with the Disclosure and Barring Service and any criminal convictions

### **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

### **Statutory/Contractual requirement**

The Company has certain legal and contractual requirements to collect personal data. These include, but not limited to:

- To comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003
- Immigration and tax legislation
- To carry out pre-engagement vetting checks, including but not limited to:
  - Verify your right to work
  - To comply with the Safeguarding Vulnerable Groups Act 2006
  - To comply with the Department for Education statutory guidance (Keeping Children Safe in Education) to verify your physical and mental fitness to teach and/or work with children
  - To comply with the Education (Health Standards) (England) Regulations 2003 to verify your suitability to work in regulated activity with children

Our clients may also require this personal data, and/or we, may need your data to enter into a contract with you.

Failure to provide us with the personal data we need to collect will result in the company being unable to continue to provide work-finding services to you.

### **Recipients of Personal data**

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

- Clients (whom we may introduce or supply you to)
- Former employers to seek references from
- Named individuals you provided for seeking a reference from
- Payroll service providers or other payment intermediaries whom we may introduce you to (If you have chosen to use this option)
- Your umbrella company (if you have chosen to use this option)
- Third parties which provide, host and/or support our IT systems and software (subject to appropriate security measures)
- Capita plc to carry out DBS checks
- GOV.UK and the Disclosure and Barring Service for performing criminal records update checks and the overall protection of vulnerable groups
- Department of Education and Teaching Regulation Agency and Education Workforce Council to perform teacher status checks , qualification checks, teacher section and restriction checks
- HMRC for audit purposes and the provision of employment and payroll information
- Now Pension provider
- UK Government's Visas and Immigration and the Home Office for checking right to work status.
- Overseas criminal records agencies and law enforcement agencies if you have been resident outside of the UK in the last 5 years for at least 6 months
- Audit and accreditation providers, such as The Recruitment and Employment Confederation (REC), the International Organization for Standardization (ISO) GOV.UK Department of Business, Innovation & Skills

## **PERSONAL DATA THE COMPANY COLLECTS ON YOU**

### ***Personal data:***

- Contact details, CV, type of candidate, subject specialism, focus areas and work preferences when provided on job boards and/or LinkedIn
- References
- Client feedback
- Consultant notes
- Online activity specific only to the Company's web site

### ***Special Category personal data:***

- Health information in accordance with the Education (Health Standards) (England) regulations 2003
- Criminal conviction and record checks strictly adhering to all established codes of conduct and processing

### **Source of the personal data:**

- You provided it directly
- Former employer
- A referee whose details you provided to us
- Various Jobs boards and aggregators, such as Broadbean and LinkedIn

## **DATA RETENTION**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it.

Different laws 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.

There is a legitimate interest to hold your personal data for no longer than 6 years after our work-finding service relationship ends.

Where the Company has obtained your consent to process your personal data and Special Category data, we will do so in line with our retention policy.

Where consent is not granted the Company will cease to process your personal data and Special Category personal data.

## **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
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and Special Category personal data you have the right to withdraw that consent at any time by contacting the DPO at [andy@classroomteachers.co.uk](mailto:andy@classroomteachers.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.**

### **COOKIES AND LOG FILES**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log files and third-party tracking cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

### **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **SHARING**

We may share aggregated demographic information with our clients. This is not linked to any personal information that can identify any individual person.

### **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.

### **DATA SECURITY**

The Company takes every precaution to protect our users' information. Only the company's employees who need the information to perform a specific job (for example, our payroll manager or recruitment consultants) 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 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 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 of our website, you can send an email to [enquiries@classroomteachers.co.uk](mailto:enquiries@classroomteachers.co.uk)

### **CORRECTION/UPDATING PERSONAL INFORMATION**

If your personally identifiable information changes (such as address), we will endeavour to provide a way to correct, update or remove the personal data provided to us. This can usually be done by emailing [enquiries@classroomteachers.co.uk](mailto:enquiries@classroomteachers.co.uk)

### **NOTIFICATION OF CHANGES**

If we decide to change our privacy policy, we will post those changes on our Homepage so our users are always aware of what information we collect, how we use it, and under circumstances, if any, we disclose it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

### **CONTROLLING YOUR PERSONAL INFORMATION**

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at

[enquiries@classroomteachers.co.uk](mailto:enquiries@classroomteachers.co.uk)

We will not sell, distribute or lease your personal information to third parties unless we are required by law to do so. You are able to request details of personal information which we hold about you.

Please send requests to:

Andy Skarpellis  
Classroom Teachers Ltd  
Unit 3, Marlborough Business Centre  
96 George Lane  
London  
E18 2FF

or via email to [andy@classroomteachers.co.uk](mailto:andy@classroomteachers.co.uk)

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

#### **COMPLAINTS OR QUERIES**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact the Data Protection Officer using the details above.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk> 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.

If you have any questions or if you feel that we are not complying with the terms of this privacy policy please do contact us by e-mailing us at the following address [andy@classroomteachers.co.uk](mailto:andy@classroomteachers.co.uk) inserting the words 'Privacy Policy Grievance' in the heading.

The DPO is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.