

Privacy Notice

Central Recruitment Services Ltd is a values-based company and is committed to protecting the privacy of our candidates, workers, customers, delegates and users of our website and associated web-based portals. We will ensure that the information we receive about you, through our website or otherwise, is used for the purposes set out in this Privacy Notice.

Who controls your personal data?

The Data Controller is: Central Recruitment Services Ltd

Registered Company Number: 3713353

Address: Studio 1.4, Islington Studios, Marlborough Road, London, N19 4NF

Information Commissioner's Office Registered Number: Z9681737

Data Protection Lead: Steven Patten, Director

What we do and who we work with

Central Recruitment Services Ltd, trading as Central, Central Care and Central Training is a recruitment agency, a supplier of temporary staffing services (sometimes referred to as an employment business), a provider of contingency staff management systems and a provider of training solutions.

Our customers are organisations that use recruitment, temporary staffing, contingency staff management systems and training services.

Our Preferred Supplier List (PSL) agencies are also recruitment agencies, suppliers of temporary staffing services and providers of training services.

Data Controllers and Data Processors

Central is a data controller who holds and processes information about our applicants, temporary workers, employees, customers, suppliers and PSL agencies' applicants and temporary workers.

Our customers are data controllers who will also gather, hold and process information about our applicants and temporary workers, and PSL agencies' applicants and temporary workers.

Central is also a data processor for our customers and PSL agencies, gathering, holding and processing information about their applicants, temporary workers and employees, our applicants and temporary workers, and PSL agencies' applicants, temporary workers, and employees.

Our customers are also data processors for Central and PSL agencies who will gather, hold and process information about our applicants and temporary workers and PSL agencies' applicants and temporary workers.

PSL agencies are also data processors for Central and our customers who will gather, hold and process information about their applicants and temporary workers.

Central, our customers and PSL agencies are legally obliged to protect this information and for this reason, Central is a registered data controller with The Information Commissioner's Office (ICO).

General Data Protection Regulations (GDPR) - 6 Principles of Data Processing

Central fully endorses and complies with the 6 principles within Article 5 of the GDPR, which states that all personal data must be:

1. Processed fairly, lawfully and in a transparent manner in relation to the data subject
2. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed
4. Accurate and, where necessary, kept up to date
5. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed
6. Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Central, PSL agencies and our customers process the following personal data for a number of legitimate business activities

- Identity information: name, date of birth, gender, national insurance number
- Location: home address, work addresses
- Contact details: phone numbers, email addresses
- Health information: disability, health, sickness,
- Ethnicity and nationality
- Right to work in the UK, passport, visa status,
- Education, qualifications, training, skills, experience
- Criminal convictions, alleged criminal activity, and related information
- Salary, tax, bank details
- Work history
- References
- Next of kin and emergency contact details
- Work availability
- CCTV images

Central, PSL agencies and our customers process personal data for the following purposes

- To send information to third parties with whom we have or intend to enter into arrangements which are related to our services
- To register and recruit to positions working with vulnerable adults and children
- To notify applicants and workers of potential roles or opportunities
- To assess and review suitability for job roles
- For staff administration
- To retaining a record of our transactions
- To pay wages or to facilitate the payment of wages by a third party
- To provide information about other services we offer that are similar to those have already been provided with or enquired about
- To perform tasks in connection with legal proceedings or obtaining legal advice
- To comply with our legal and regulatory obligations
- To ensure we do not discriminate against people on the grounds of race, gender, age, disability, religion or sexuality

- To account for the work our customers do for the commissioning organisations that fund them
- To perform tasks carried out in the public interest or discharge our statutory rights
- To collate market or sector specific information and provide the same to our clients
- To provide information to regulatory authorities or statutory bodies, and our legal or other professional advisers including insurers
- To market our services
- To establish quality, training and compliance with our obligations and best practice
- Backing up information on our computer systems
- Personalise your experience and our offering, whether via our website or otherwise
- Prevention or detection of a crime

What is the legal basis for processing personal data?

Central and our customers process personal data for legitimate business interests and this is the legal basis for processing personal data.

We will also rely on the following for specific uses of personal data:

Contract

We will rely on contract if we are negotiating or have entered into a placement agreement with you or your organisation or any other contract to provide services to you or your organisation, or receive services from you or your organisation.

Legal Obligation

We will rely on legal obligation if we are legally required to process information relating to you to fulfil our legal obligations.

Consent

We will rely on consent for particular uses of personal data from time to time and on such occasion you will be asked for your specific consent. An example of when consent may be the lawful basis for processing personal data includes processing your ethnicity and nationality for the purposes of monitoring diversity.

Automated decisions

We do not use automated decision making in processing your personal data.

Our legitimate interests in processing, collecting and retaining your personal data

As a recruitment agency, a supplier of temporary staffing services and a provider of contingency staff management systems, Central introduces workers to customers for permanent employment and temporary placements. The exchange of personal data of our applicants, workers, our customer, PSL agency contacts and their applicants and workers is a fundamental and essential part of this process.

In order to provide recruitment services to our applicants, workers and our customers we require a database of worker and customer personal data containing historical information as well as current requirements.

This means that for our commercial viability and to pursue these legitimate interests, we may continue to process your personal data for as long as we consider necessary for these purposes.

- To maintain, expand and develop our business we need to record the personal data of candidates, workers, and customer contacts
- Retaining records of our dealings and transactions and where applicable, use such records for the purposes of
 - establishing compliance with contractual obligations with customers or suppliers
 - addressing any query or dispute that may arise including establishing, exercising or defending any legal claims
 - protecting our reputation
 - evaluating quality and compliance including determining staff training and system requirements
 - maintaining a backup of our system, solely for the purpose of being able to restore the system to a particular point in the event of a system failure or security breach

Disclosure of your information to third parties

Central will disclose your personal information to third parties including our customers and PSL agencies:

- For the purposes of providing our services including recruitment, temporary staffing and contingency staff management systems
- If we are under a duty to disclose your personal data in order to comply with any legal or contractual obligation, or to protect our customers' or others rights, property, or safety.
- Investigation of misconduct
- Prevention or detection of crime

This includes exchanging information with other companies and organisations to:

- Account for the work they do for the commissioning organisations that fund them
- Perform tasks carried out in the public interest or discharge our statutory rights
- Perform tasks in connection with legal proceedings or obtaining legal advice
- Comply with their legal and regulatory obligations
- Ensure they do not discriminate against people on the grounds of race, gender, age, disability, religion or sexuality
- Prevent fraud
- Comply with a court order
- Report a criminal act
- Prevent serious risk to yourself or others
- To maintain records of our dealings to address any later dispute, including but not limited to the establishment, exercise or defence of any legal claims

The lawful basis for the third party processing will include:

- Their own legitimate business interests in processing your personal data
- To fulfil their legal obligations
- For the purpose of a contract in place or in contemplation;
- Satisfaction of their contractual obligations to us as our data processor

If you do not wish to provide us with necessary data

There may be circumstances where we require you to provide data which is necessary for us to meet statutory or contractual obligations, or perform our services.

If you do not wish to provide us with information we request, then please notify us. However, please be aware that as a result we may be unable to provide you with our services, and in some cases, this may result in a breach of the contract we have with you.

Retention of your data

It is our policy to only store your personal data for as long as is necessary for us to comply with our legal and contractual obligations and for our legitimate business interests including providing you with our work finding services. Central retains data for 7 years from the last point at which we provided any services or otherwise engaged with you to comply with the Limitation Act 1980 before deleting it.

Some information is kept for longer than a 7 year period where we have a legal or contractual obligation to do so, or we form the view that there is otherwise a continued basis to do so (e.g. serious incidents, safeguarding concerns or complaints) in which case we may continue to process your personal data for as long as we consider necessary for these purposes.