



# Supply&Teach

QUALITY PRIMARY SUPPLY TEACHERS

<b>Company Name:</b>	Supply&Teach Ltd ('the Company')
<b>Company Contact details:</b>	David Mackinnon david@supplyandteach.org
<b>Document</b>	Privacy Notice (incorporating Privacy Notice DP5A and DP5B)
<b>Topic:</b>	Data protection
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<b>Version:</b>	1

## 1. Definitions and interpretation

a. In this privacy policy, the following definitions are used:

<b>Data</b>	Collectively all information you submit to Supply&Teach Ltd via the website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Data Protection Laws</b>	Any applicable law relating to the processing of personal data, including but not limited to the GDPR, and any national and implementing and supplementary laws, regulation and secondary legislation;
<b>GDPR</b>	The UK General Data Protection Regulation;
<b>Supply&amp;Teach Ltd, we or us</b>	Supply&Teach Ltd, a company incorporated in England and Wales with registered number 13818979 whose registered office is at Mill House, Ingleby Road, Stanton by Bridge, Derbyshire DE73 7HU;
<b>User or you</b>	Any third party that accesses the website and is not either (i) employed by Supply&Teach Ltd and acting in the course of the;
<b>Website</b>	The website that you are currently using, <a href="http://www.supplyandteach.org">www.supplyandteach.org</a> , and any sub-domains of this site are expressly excluded by their own terms and conditions.

b. In this privacy policy, unless the context requires a different interpretation:

- i. The singular includes the plural and vice versa;
- ii. References to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or of this privacy policy;

- iii. A reference to a person includes firms, companies, government entities, trusts and partnerships;
- iv. “including” is understood to mean “including without limitation”;
- v. Reference to any statutory provision includes any modification or amendment of it;
- vi. The headings and sub-headings do not form any part of this privacy policy.

## 2. Scope

This privacy policy applies between you, the User of this Website and Supply&Teach Ltd, the owner and provider of the website. Supply&Teach Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all data collected by us or provided by you in relation to your use of the website. It does not extend to any websites that can be accessed from the website including but not limited to, any links we may provide to social media websites.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions, which can be found within our Website Disclaimer.

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. 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 the terms of the following statement.

## 3. Collection and use of personal data

### a. How we collect data

We collect data in the following ways;

- Data is given to us by you;
  - Data is collected automatically
1. Data that is given to us by you  
Supply&Teach Ltd will collect your data in a number of ways, for example:
    - i. When you contact us through the website, by telephone, post, e-mail or through any other means;
    - ii. When you complete surveys that we use for research purposes (although you are not obliged to respond to them);
    - iii. When you use our services;

In each case, in accordance with our privacy policy.

2. Data that is collected automatically  
To the extent that you access the website, we will collect your data automatically, for example:
  - i. We automatically collect some information about your visit to the website. This information helps us to make improvements to the website content and navigation, and

includes your IP address, the date, times and frequency with which you access the website and the way you use and interact with its content.

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

The Company will collect your personal data (which may include sensitive 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.

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.

The legal bases we rely upon to offer these 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

#### **c. 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:

- As a recruitment business, we introduce candidates to clients for temporary worker placements or permanent employment. The exchange of personal data of our candidates and our client contacts is a fundamental, essential part of this process.
- In order to support our candidates' career aspirations and our clients' resourcing needs, we require a database of candidate and client personal data containing historical information as well as current resourcing requirements.
- To maintain, expand and develop our business we need to record the personal data of prospective candidates and client contacts. This enables us as a business to provide recruitment services to candidates and clients by sharing your information with prospective employers, assessing your skills against potential vacancies and sourcing potential opportunities.
- For clients, we store contact details of your organisation as well as records of conversations, meetings, jobs and placement information.
- To deliver our ancillary services we need to use your personal data for payroll and invoicing

#### **d. Recipient/s of data**

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

- Clients that the Company introduces or supplies individuals to e.g., schools, academy trusts

- Candidates' former or prospective new employers that the Company obtain or provide references to
- The Recruitment and Employment Confederation
- Any other third parties who carry out audits to ensure that you run your business correctly
- Payroll service providers in the event of their use by the Company
- Any umbrella companies that you pass candidate data to e.g. UCheck
- The Company's insurers
- The Company's legal advisers
- Social networks
- The Company's IT and CRM providers
- Any public information sources and third-party organisations that you may use to carry out suitability checks on work-seekers e.g. Companies House, the Disclosure and Barring Service (DBS), National College for Teaching and Leadership (NCTL), Government, law enforcement agencies and other regulators e.g. the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs)
- Trade unions;
- Any other organisations an individual asks the Company to share their data with.

#### **e. Statutory/contractual requirement**

Your personal data is required by law and/or a contractual requirement (e.g. our client may require this personal data), and/or a requirement necessary to enter into a contract. You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We cannot supply you with work-seeker opportunities or placements.

#### **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.

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.

Where the Company has obtained your consent to process your personal and sensitive personal data we will do so in line with our retention policy (a copy of which is available from David Mackinnon ([david@supplyandteach.org](mailto:david@supplyandteach.org)) upon request. 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.

#### **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 David Mackinnon.

There may be circumstances where the Company will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting 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 undertake automated decision making or profiling. We do use our computer systems to search and identify personal data in accordance with parameters set by a person. A person will always be involved in the decision-making process.

## 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. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. The cookies in use to deliver Google Analytics services are described in the table below.

Cookie	Name	Purpose
_utma _utmb _utmc _utmv	Google Analytics	These cookies are used to store information, such as what time your current visit occurred, whether you have been to the site before, and what site referred you to the web page. These cookies contain no personally identifiable information but they will use your computer's IP address to know from where in the world you are accessing the Internet. Google stores the information collected by these cookies on servers in the United States. Google may transfer this information to

_utmz		third-parties where required to do so by law, or where such third-parties process the information on Google's behalf.
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### Opt-out

In order to provide website visitors with more choice on how data is collected by Google Analytics, Google has developed the Google Analytics Opt-out Browser Add-on. The add-on communicates with the Google Analytics JavaScript (ga.js) to stop data being sent to Google Analytics. The Google Analytics Opt-out Browser Add-on does not affect usage of the website in any other way. A link to further information on the Google Analytics Opt-out Browser Add-on is provided below for your convenience.

<http://tools.google.com/dlpage/gaoptout?hl=None>

For more information on the usage of cookies by Google Analytics please see the Google website. A link to the privacy advice for this product is provided below for your convenience.

<http://www.google.com/analytics/learn/privacy.html>

### Disabling Cookies

If you would like to restrict the use of cookies, you can control this in your Internet browser. Links to advice on how to do this for the most popular Internet browsers are provided below for convenience and will be available for the Internet browser of your choice either online or via the software help (normally available via key F1).

Internet Explorer <http://windows.microsoft.com/en-GB/windows7/Block-enable-or-allow-cookies>

Google Chrome [https://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647&p=cpn\\_cookies](https://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647&p=cpn_cookies)

Mozilla Firefox <http://support.mozilla.org/en-US/kb/Blocking%20cookies>

Apple Safari <http://docs.info.apple.com/article.html?artnum=32467>

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 other websites

This website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## 10. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, in the first instance we encourage you to please contact: David Mackinnon email: [david@supplyandteach.org](mailto:david@supplyandteach.org) or in writing at: Mill House, Ingleby Road, Stanton-by-Bridge, Derbyshire, DE73 7HU

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.

### **11. 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.

### **12. Data Security**

The Company takes every precaution to protect our users' information. All Company IT equipment is fingerprint protected to a specific user, uses McAfee for its firewall and malware protection and is also protected with Two Factor Authentication. In addition, the systems for storing data are themselves individually password protected. The Company's website ([www.supplyandteach.org](http://www.supplyandteach.org)) has HTTPS security protocol and is validated with an SSL certificate. It uses industry best practices for handling personal information (PII) and managing website security risks and is monitored 24/7 for any suspicious activity. The information stored on our cloud-based CRM system is held on secure servers by our third-party CRM provider. Appropriate physical, technical and organisational measures have been designed to secure users' information against accidental loss and unauthorised access, use, alteration or disclosure.

Only employees or designated third parties who need the information to perform a specific job (for example, consultants, our accountants or specific software providers) 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 [david@supplyandteach.org](mailto:david@supplyandteach.org)**

### **13. 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.