Company Name:	Frontline Recruitment ('the Company')
Company Contact details:	General Manager Head Office Manager
FLR Privacy Policy (temp)	Privacy Notice (temporary staff)
Topic:	Data protection
Date:	May 2018
Version:	1

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.

1. Collection and use of personal data

a. 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

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 interests is/are as follows:

- Managing your database and keeping work-seeker records up to date;
- Contacting the individual to seek your consent where you need it;
- Providing work-finding services to the individual, including sending their information to your clients where they have demonstrated an interest in doing that particular type of work but not expressly consented to you passing on their cv;
- Contacting the individual with information about similar products or services that they have used from you recently; and
- Passing work-seeker's information to debt collection agencies.

c. Recipient/s of data

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

- Clients that you introduce or supply individuals to (if you supply into a particular sector, you can choose give examples e.g. schools, nurseries, hospitals, care homes, local authorities, warehouses. You do **not** need to name each individual client.
- Candidates' former or prospective new employers that you obtain or provide references to
- The Recruitment and Employment Confederation (and any other trade body that you are a member of who may have access to your candidates' data)
- Any other third parties who carry out audits to ensure that you run your business correctly
- Payroll service providers who manage your payroll on your behalf
- Any umbrella companies that you pass candidate data to
- Other recruitment agencies in the supply chain (e.g. master/neutral vendors and second tier suppliers);
- Your insurers
- Your legal advisers
- Social networks
- Your 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), Nursing and Midwifery Council (NMC), General Medical Council (GMC), DVLA, credit reference agencies
- Government, law enforcement agencies and other regulators e.g the Police, Home Office, HMRC, Employment Agencies Standards Inspectorate (EASI), Local Authority Designated Officers (LADOs), GLAA,
- Trade unions;
- Any of your group companies; and
- Any other organisations an individual asks you to share their data with. Please note that this is not an exhaustive list. You will need to examine your recruitment practices and identify any parties that you process personal data with.

d. 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 will not be able to find you work

2. 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/or sensitive 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 personal and/or sensitive data.

3. 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 and/or sensitive data you have the right to withdraw that consent at any time by contacting the branch that you have registered for work with.

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.

4. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Head Office Manager – headoffice@frontlinerecruitment.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.