

Our Privacy Policy

Industrial Workforce (NW) Ltd (hereinafter “Workforce”) is a recruitment business which provides work-finding services to its clients and work-seekers. Workforce must process personal data (including sensitive personal data) so that it can provide these services – in doing so, Workforce acts as a data controller.

You may give your personal details to Workforce 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. Workforce 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 this privacy statement. At all times we will comply with current data protection laws.

Collection and use of personal data

Purpose of processing and legal basis

Workforce 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.

If you have opted-in we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding 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

Legitimate interest

This is where Workforce 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 Workforce has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping records up to date;
- Providing work-finding services to candidates and clients;
- Providing and managing benchmarking and skill testing records;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently;

- Providing and managing payroll operations;
- Providing information to third party debt collection agencies.

Statutory/contractual requirement

Workforce has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.) Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect we may not be able to continue to provide work-finding services to you.

Categories of personal data that may be collected

The categories of personal data Workforce may collect will depend on the type of contact you have with us. This data may be collected directly or from a third party or publically accessible source.

Candidates

If you are a Candidate or Work Seeker Workforce may collect the following personal data:

- Name and any Previous Names
- Photographic ID or other Right to Work documentation
- Date of Birth
- Marital Status
- Address and postcode
- Email address
- Telephone numbers
- National Insurance number
- Nationality
- Immigration status
- Record of criminal convictions
- Emergency contact details
- Qualifications, licences and certifications
- Employment history / CV
- Work and personal referee details
- Current salary and bank account details
- Tax status
- Sensitive personal data such as sex / gender, physical or mental disabilities and additional health information about any health condition that may affect your ability to undertake certain roles as may be required in line with Working Time Regulations
- And any additional information that you, your referees, our Clients or third party agency may provide about you.

Clients

If you are a Client Workforce may collect the following personal data:

- Contact details for you and employees of your organisation such as name, work address, email address and telephone number

- Details about previous, current and prospective job requirements
- Records of correspondence and other contact as required to maintain service levels.
- Credit status details

Suppliers

If you are a Supplier Workforce may collect the following personal data:

- Contact details for you and employees of your organisation such as name, work address, email address and telephone number
- Details of previous and current orders, invoices and payments
- Bank Details, Company number and VAT number
- Credit status details

Website

If you are a Website User Workforce may collect the following personal data:

- Name, address, contact telephone numbers and email address
- Search criteria for job roles and location
- IP address, traffic data, location data, date and time stamps and content from contact forms

Recipient/s of data

Workforce will process personal data and/or sensitive personal data with the following non exhaustive list of recipients:

- Clients (whom we may introduce or supply work seekers to)
- Candidate Former employers from whom we may seek references
- Candidate Prospective employers to whom we may provide references
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to
- Pension providers and HMRC in line with payroll regulatory requirements
- Other recruitment agencies in the supply chain including master or neutral vendors
- ISO Representatives and other third parties who carry out audits to ensure that we run Workforce correctly
- Our insurers and insurance brokers, legal and other professional advisors, and our accountants and auditors
- Social networks and platforms such as Facebook and LinkedIn
- Our IT Support, Database and Payroll Software, Website host / maintenance providers, benchmark and skills testing providers and providers of marketing services
- Public information sources and third party organisations that we may use to carry out suitability checks on work seekers such as the Disclosure and Barring Service and the DVLA
- Public information sources and third party organisations that we may use to carry out Client Credit Account checks such as credit reference agencies and Companies House
- And where required by law, Government, law enforcement agencies and other regulators for example the Police and the Home Office.

Overseas Transfers

Workforce may transfer the information you provide to us to countries outside the European Economic Area ('EEA') for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information. The EEA comprises the EU member states plus Norway, Iceland and Liechtenstein.

Data retention

Workforce will retain your personal data only for as long as is necessary for the purpose we collect it. For example we may keep assignment information for as long as it is deemed likely that a reference may be requested from a third party regarding your employment with us. Also, different laws may 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 pension 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.

In respect of marketing data, Workforce will keep your information for as long as you wish to receive communications and all other data for the period required in order to meet our business, legal or regulatory responsibilities. Where Workforce 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 Workforce will seek further consent from you. Where consent is not granted Workforce will cease to process your personal and/or sensitive data.

Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data Workforce processes on you;
- The right of access to the personal data Workforce 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 Workforce processing your personal and/or sensitive data you have the right to withdraw that consent at any time by contacting Amanda Davis at amanda@workforce.uk.com or contact our Head Office on 0151 236 0831. 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 Workforce 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 Workforce 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

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. Cookies also enable us to deliver more personalised content. Most web browsers allow some control of most cookies through the browser settings.

Log Files

We may 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.

Links to external websites

Workforce's website may contain links to other external websites. Please be aware that Workforce is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by Workforce's website.

Sale of business

If Workforce 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

Workforce takes every precaution to protect our users' information. Security measures include use of firewall technology, limited access and password protection.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

Workforce 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 Workforce 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 amanda@workforce.uk.com

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.

Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it please contact: Amanda Davis at amanda@workforce.uk.com or by calling our Head Office on 0151 236 0831.

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.

Rev: May 2018