

General Data Protection Regulations -Policy Statement

**PRIVACY NOTICE**

Blue Pencil is committed to maintaining the highest level of data protection across all activities of its business. Confidentiality and data protection will always be a paramount consideration for us and this impacts on how we deal with clients, candidates and any other service providers that support our operations.

Any personal data that is provided to us either for the purposes of our recruitment service activity or for our own employment purposes will always be processed in accordance with all applicable data protection laws in force from time to time (e.g. Data Protection Act 1998 and the 2018 General Data Protection Regulations).

**CANDIDATES**

For candidates, the information we may collect to assist you with career development and subsequent placements is likely to include some or all of the following:

|  |  |  |
| --- | --- | --- |
| \*Name | · | Your name |
| \*Address | · | Your address |
| \*Email address | · | Your email address |
| \*Telephone number | · | Your telephone number |
| \*CV/work history | · | CV/work history |
| \*job preferences including role/geographical areas and salary/other related information   |  |  |  | | --- | --- | --- | |  | · |  | | · | Job preferences including role, geographical areas and salary |
| **CLIENTS**  For clients, the information we may collect to assist us in managing our recruitment services include include the following:   |  |  |  | | --- | --- | --- | | \* | · | Name of business | | \* | · | Location/locations | | \* | · | Names and contact details for client contact points | | \* | · | Demographical/descriptive information relating to client size/nature of operations, | | \* | · | Record of previous placements/dealings with client | | \* | · | Details of client vacancies and related information | | · | Any other work related information you provide, for example, education or training  Certificates |

**EMPLOYEES**

For those individuals who are currently employed by the firm or who have worked with us in the past, information on the following areas is likely to be retained solely for the purposes of compliance with statutory employment regulations and our duties as an employer:

|  |  |
| --- | --- |
| · | Passport details (where applicable) |
| · | Permits and visas (where applicable) |
| · | DOB |
| · | National insurance number |
| · | CV/work history |
|  |  |
| · | Medical information as appropriate (e.g. disability discrimination, management of ill health |
| · | References |
| · | Financial information (including but not limited to payroll details and terms, HMRC data, pension scheme details, court orders and statutory payments) |
| · | A log of our communications with you by email and telephone |

This above information will normally have been directly obtained from the individual being employed/employed by the firm.

In respect of references, it is the firm’s policy to obtain basic factual employment information regarding recent employment from previous employer/s. Any medical information obtained will only have been done so with the employee’s explicit consent with the aim of assisting the firm to manage ill health or known medical conditions protected under disability discrimination legislation.

**DATA RETENTION**

**CANDIDATES/CLIENTS**

All candidate and client related data is stored securely on a password protected externally hosted database in compliance with all relevant data protection regulations.

**Disclosure of candidate information**

Candidate CVs and related information will be shared or sent to prospective employers and our clients with the agreement of the candidate.  Once a placement has been secured, Blue Pencil will work to obtain and provide the client with any relevant follow up information required for them to process a candidate’s appointment. Blue Pencil operates globally and takes all reasonable precautions to ensure that any client it is dealing with maintains an adequate level of protection or the appropriate safeguards are in place to maintain data confidentiality where information is being passed on for employment purposes.

**EMPLOYEES**

Blue Pencil and its third party payroll provider only holds the necessary minimum information to ensure that an employee can be paid and the relevant data returns made to the appropriate authorities in respect of employment related contributions (HMRC), pensions etc. Payroll related data is maintained securely on a password protected database by our third party payroll provider as well as the relevant pension scheme provider. Other employee related information for the purposes of ongoing management (appraisals etc) is maintained securely by the HR Director.

**RIGHT OF ACCESS TO INFORMATION (Candidates.Clients.Employees)**

Blue Pencil is committed to ensuring that any individual is afforded access to information relating to them that Blue Pencil holds. An individual has the right at any time to ask for a copy of the information about them that Blue Pencil maintains. Blue Pencil works on the principal that all data is maintained with the consent of the relevant parties purely for the administration of its recruitment services or more directly for the employment of its staff. Any requests for information should be directed to Chris Lipscomb who is the accountable Director in respect of General Data Protection Regulations: [chris.lipscomb@bluepencil-legal.com](mailto:chris.lipscomb@bluepencil-legal.com)

In addition to this right of access, all individuals have the right to request: erasure, restriction of processing, objection and data portability

**RETENTION OF DATA/WITHDRAWL OF CONSENT**

Data will be retained for no longer than is necessary both in relation to our recruitment service activities (up to a max of 3 years or longer with permission of individual) as well as our responsibilities as an employer. Individuals may withdraw their consent at any point in time

**Withdrawal of consent**

If an individual has provided us with consent to process data, for the purpose of using our services and us finding the individual suitable work, the individual has the right to withdraw this consent at any time.

**Who to speak to**

As Blue Pencil takes data protection very seriously, the responsibility for data protection rests directly with Chris Lipscomb, Director and Chief Operating Officer of Blue Pencil. Chris can be contacted by email: [chris.lipscomb@bluepencil-legal.com](mailto:chris.lipscomb@bluepencil-legal.com)

**Policy Review**

This policy will be reviewed at least annually by the Chief Operating Officer of Blue Pencil. This policy was last reviewed in May 2018.