

Privacy Policy Version 1.5

Safety and Environmental Consulting needs to collect and use personal information pertaining to employees and representatives of organisations it interacts with. By providing information to us (either in person, by letter, phone or email), those individuals agree to the processing set out in the relevant Privacy Schedules set out below.

We are committed to protecting the privacy of all those individuals about whom we hold and use personal information (information, or a combination of pieces of information, that could reasonably allow you, as a living individual, to be identified). This Privacy Policy explains how we collect, manage and use the personal data of all those individuals.

We may change this Privacy Policy (or the individual Privacy Schedules below) from time to time to ensure it reflects current legislation without notice to you, so please check it regularly as required.

1. Privacy Schedule for Clients

This schedule sets out the details of our processing of personal information of our customers and their employees or representatives.

1.1 What Information We Collect About You

Depending on the circumstances, we may hold some or all of the following about you:

- your name
- your contact details (email, phone numbers)
- how you would like to hear from us
- details relating to your role in the client company's organisation (e.g. job title, responsibilities, staff report to/from etc.)
- training records (training undertaken, training required, certificates issued, refresh dates etc.)
- your enquires, feedback, responses to surveys and consultations and details of individual complaints and other direct contact with us

1.2 How Do We Use Your Information

We collect information in consultation with representatives and employees of organisations in order to be able to deliver our services. This includes:

- Contact with staff in support of service administration and delivery
- Understanding the staffing structure of an organisation and the roles within that structure
- Assessing and recording the skills required for relevant roles and the training required to carry these out effectively
- Reminding organisations and individuals of when critical health and safety elements need to be redone or refreshed (e.g. audits, risk assessments, training certificates etc.)

- Alerting organisations to new and relevant training courses and services
- General matters in relation to the administration of the client account

Unless otherwise specified, or required or implied by legislation, we archive client information 1 year after the end of the contract/relationship with the client and delete this 6 months later.

We retain historical records of training in perpetuity, as some of the certificates issued can be valid for several years. We retain this information to be able to respond to requests from candidates, to confirm that a certificate was previously held/issued or whether a specific qualification was attained and/or remains valid. As part of our professional services, we will also remind candidates when certificates expire and/or need to be refreshed.

1.3 Legal Basis for Processing Personal Information

Processing is necessary in order to provide the range of services and associated services that we have been contracted to deliver.

1.4 How We Share this Data

We do not share data with any organisations except under the following circumstances:

- We may need to share data with training organisations for accreditation purposes.
- We may need to share data with enforcing authorities where directed i.e. Health and Safety Executive, Police, local authorities and other law enforcement and regulatory and safeguarding agencies where we are satisfied that the relevant agency has a proper legal basis for obtaining personal information.
- We will not share data with any other organisation or individuals without explicit permission from the data owner or their employer

We do not sell or share data for marketing purposes.

2. Privacy Schedule for Employees

This schedule sets out the details of our processing of personal information of our employees.

2.1 What Information We Collect About You

We may hold and process some or all of the following about you:

- Your name, date of birth and gender
- Your address and contact details, including email address and telephone number(s)
- The terms and conditions of your employment
- Details of your qualifications, skills, experience and employment history
- Information regarding your remunerations, including entitlement to benefits such as pensions or insurance cover
- Expenses details including mileage, travel and accommodation
- Your bank account details and national insurance number
- Information regarding you marital status

- Information about your nationality and entitlement to work in the UK (including a copy of your passport and/or work visa)
- Details on any unspent convictions
- Your driving licence endorsements and driving convictions (where appropriate)
- Your work schedule and attendance at work
- Your trade union affiliations (where membership fees are deducted from payroll)
- Periods of leave taken, including holiday, sickness absence, unpaid etc. and the reasons for that leave
- Details of any disciplinary or grievance procedures in which you have been involved in your employment with us
- Assessments of your performance during your employment with us, including appraisals, performance reviews and action plans
- Information regarding your medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments

2.2 How Do We Use Your Information

The data may be collected in a variety of ways;

- Obtained from your passport or other identity documents such as your driving licence
- By you at the start of or during employment through application forms, CVs or other correspondence with you; or through interviews, meetings or other assessments.
- Personal data may also be collected about you from third parties, such as references supplied by former employers and information from criminal records checks where appropriate for the role
- Data will be stored in a range of different places, including in your personnel file and on the company's computers/servers

We process personal information for the purposes of administration, workforce planning and forecasting, recruitment, payments and benefits, performance management, career development and succession planning, adhering to our policies and procedures, responding to legal claims, maintaining and promoting workplace equality and programmes of work.

In addition, we may process sensitive personal information (known as special category data) such as information relating to your health or medical condition if it is needed for legitimate business reasons (such as determining your physical ability in the workplace environment) or if it is required to comply with applicable law (such as determining the extent of the reasonable adjustment the company is required to make in discharging its duty as an employer under the Equality Act 2010). Sensitive personal information will not be collected, processed or transferred, except where adequate privacy protection mechanisms are in place.

Unless otherwise specified, or required or implied by legislation, we delete relevant personal information no later than 18 months after the end of the employment contract or relationship with the employee.

2.3 Legal Basis of Personal Information Processing

We will be processing your personal information to fulfil the obligations of the employment contract that you have entered with us. For example, we need to process your data to provide you with an employment contract, to recruit you, pay you in accordance with your employment contract including deductions for tax, pensions, trade union subscription and to administer relevant benefits and entitlements.

In some cases, we will be processing your personal information to fulfil our legal obligations. For example, we will be processing your right to work in the UK through information such as passport data or visa information, proof of address and national insurance. We will also use data to deduct tax, to comply with health and safety laws and to enable colleagues to take periods of leave to which they are entitled. We will be processing some special categories of personal data, such as information about health or medical conditions.

We may process some categories of your personal information where there is a legitimate business interest to do so and where there are adequate privacy protection mechanisms in place.

We will be processing some employee personal data which relates to certain employee benefits (e.g. life assurance) as part of our obligations under your employment contract.

Other employee benefit providers (e.g. private medical health insurance) should inform you of their privacy policies when you sign up for those benefits.

2.4 How We Share This Data

Your information may be shared internally in the organisation, including members with HR and payroll functions, relevant line managers and IT/admin staff if access to the data is necessary for performance of their roles.

The Company shares your data with third parties in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers, obtain necessary criminal records checks from the Disclosure and Barring Service. In those circumstances, the data will be subject to confidentiality arrangements.

We also share your data with the following third parties that process data on our behalf:

- external recruitment services providers
- banking services providers, external payroll provider and pension administrator
- external occupational health and private medical health insurance providers
- company car and motor insurance providers
- external corporate travel providers
- IT hosting partners
- external legal advisors, employer's insurance policy providers and loss adjustors
- external auditors and other consultants and research companies (including employee survey providers)
- regulators

3. Privacy Schedule for Applicants

As part of any recruitment process, the Company collects and processes personal data relating to job applicants. The Company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Safety and Environmental Consulting Ltd is the data controller for your personal information. Our registered offices are; Safety & Environmental Consulting Ltd, Oak House Business Centre, Waterside South, Lincoln LN5 7FB. You can contact our Data Protection Officer by emailing info@safetyenviro.co.uk with the subject line **FAO Data Controller**.

3.1 What information do we collect?

We collect a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number(s)
- details of your qualifications, skills, experience and employment history
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process
- information about your entitlement to work in the UK
- information about your Criminal Record status (where required to meet safeguarding legal obligations)

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data from your application record will be stored in a range of different places, including our systems IT systems, servers and emails.

3.1 Why do we process personal data?

We need to process your personal information in order to support the recruitment and decision-making process in respect of your potential employment. In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The organisation processes health information to assess applicants' ability to perform the role applied for and if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations under the Equality Act

2010 and exercise specific rights in relation to employment. We also collect health information for the same purposes once a job offer has been made and accepted.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its legal obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, the organisation may keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

3.3 Who has access to data?

Your information may be shared internally in the organisation for the purposes of the recruitment exercise, including HR and payroll functions, interviewers involved in the recruitment process, managers in the business area with the vacancy and IT/admin staff if access to the data is necessary for performance of their roles.

The organisation will not share your data with third parties, unless your application for employment is successful and you are made an offer of employment. The organisation will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

3.4 How does the organisation protect data?

The organisation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

3.5 For how long does the organisation keep data?

If your application for employment is unsuccessful, the organisation will normally hold your data on file in relation to the vacancy you applied for, for no more than 2 months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisation will hold your data on file for consideration for future employment opportunities. Your data is deleted or destroyed at the end of the stated period, or once you withdraw your consent.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment.

3.6 What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you choose not to provide the information, the organisation may not be able to process your application properly or at all.

3.7 Automated Decision Making

We do not envisage that any decision will be taken about any individual using automated means. In the event that this position changes we will update this Privacy Policy and notify those individuals.

4. Your Rights

4.1 A summary of your Rights under the Law

- Anyone has the right to see the personal data that is held about them and have a copy provided to them, or someone else on their behalf.
- If at any point anyone believes that the personal data we hold about them is inaccurate, that person can ask to have it corrected.
- Anyone can require the company to limit the processing of their personal data in certain circumstances, for example, whilst a complaint about its accuracy is being resolved.
- Anyone can object to their personal data being processed.
- Where someone has given us their consent to process their personal data, they can withdraw that consent at any time by notifying us (see “Who to contact about your personal data” below).
- Anyone can request that their personal data is deleted altogether.
- In some circumstances, there is a right to have your information provided in a machine- readable format to ensure the portability of your personal data to other service providers.

4.2 Your Rights as a Data Subject

- You have a right to be informed how we are using your personal data. This is known as the right to be informed.
- You can request a copy of the information we hold about you, which will be provided to you within one month. This is known as a right of access.
- You have a right to update or amend the information we hold about you if it is wrong. This is known as the right of rectification.
- You can ask us to stop using your information if you think that the personal data we hold about you is inaccurate or we have done something unlawful with your personal data. This is known as the right to restrict processing.

- Ask us to delete your personal information from our records. This is known as the right to be 'forgotten' or erasure.
- You can object to the processing of your information
- You can obtain a copy of the personal information that you have supplied in a machine-readable format this is known as the right to data portability.
- You can request that your information is not to be subject to a decision when it is based on automated processing.

4.3 Exercising Your rights

Requests for personal information will generally be provided free of charge, although the company is entitled to charge a reasonable fee in certain circumstances.

Some of these rights are dependent on the legal basis under which your information is being processed. For more information of your rights please see the Information Commissioners website.

It should be noted that taking any of these steps could impact upon our ability to continue our relationship with you, the provision of our services to you and our ability to answer questions relating to our services to you.

If you would like to exercise any of your rights, have a privacy concern or have a complaint about how we have handled your personal data, please contact:

The Office Manager
Safety & Environmental Consulting Ltd
Oak House
Waterside South
Lincoln LN5 7FB
or by email to info@safetyenviro.co.uk.

We encourage you to let us know if your personal information changes or if you think the personal information we hold about you is out of date.

4.4 Making a Complaint to the Information Commissioner's Office

If you are not satisfied with our response to any query you raise with us, or you believe we are processing your personal data in a way which is inconsistent with the law, you can complain to the Information Commissioner's Office at www.ico.org.uk

5. Updates to this Privacy Policy

This Privacy Policy is the latest version, details as per the document title. The Policy will be updated from time to time and you can request to see the current version any time by emailing info@safetyenviro.co.uk or via the link on our website.

Should any significant changes be made to this notice in the future, a revised copy will be published on our website.