# Data Protection Policy

**Policy Statement**
BE Recruitment Ltd takes the security and privacy of your personal data seriously. As part of our operations, we collect, use, and store personal data relating to employees, job applicants, agency workers, clients, and others. We are committed to complying with our obligations under the Data Protection Act 2018 and the EU General Data Protection Regulation (GDPR).
This policy outlines how we manage personal data, the legal basis for doing so, and the rights and responsibilities of both the Company and individuals regarding data privacy.

**Scope**
This policy applies to the personal data of:

- Current and former employees
- Agency work seekers and agency workers
- Job applicants
- Individual client contacts
- Contractors, suppliers, and service providers

It applies to all personal data, whether stored electronically or in hard copy, and to all Company personnel involved in processing such data.

**Data Controller and Contact Information**
BE Recruitment Ltd is the data controller, responsible for determining how and why your data is processed. We are registered with the Information Commissioner's Office (ICO) under registration number ZA439600.

Data Protection Officer (DPO):
Lisa Ridley
0116 482 6500
lisa.ridley@berecruit.co.uk

**Data Protection Principles**
Personal data must be:

- Processed lawfully, fairly, and transparently
- Collected for specific, explicit, and legitimate purposes
- Adequate, relevant, and limited to what is necessary
- Accurate and kept up to date
- Retained only as long as necessary
- Processed in accordance with the rights of data subjects
- Kept secure
- Not transferred outside the EEA without adequate protection

We are accountable for these principles and must demonstrate compliance.

**Definitions**
Personal Data:
Information that identifies a living individual (e.g., name, address, NI number, employment history, etc.).

Special Categories of Data:

Includes information about:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic or biometric data
- Health
- Sex life or sexual orientation
- Criminal convictions or offences

Processing:
Any operation performed on data, including collection, storage, retrieval, sharing, or deletion.

**Legal Bases for Processing**
We process personal data based on:

- Legal obligations (e.g. reporting to HMRC)
- Performance of a contract (e.g. payroll processing)
- Legitimate interests (e.g. managing employee performance)
- Consent (when required for specific purposes)

We do not process personal data for unrelated purposes without informing you.

**When and Why We Process Personal Data**
We may process your data for the following reasons:

- Recruitment and onboarding
- Contract administration and payroll
- Performance management and training
- Disciplinary and grievance procedures
- Health and safety compliance
- Legal obligations (e.g., tax, employment law)
- Security and IT monitoring
- Reference requests
- Business planning and audit compliance
- Preventing fraud or criminal activity

We will inform you if your data will be used for new purposes.

**Processing Special Categories of Data**
We will only process sensitive data where:

- You have given explicit consent
- It is required to carry out legal obligations or exercise rights in employment
- It is needed for health and safety or equal opportunity monitoring

You can withdraw consent at any time by contacting the Data Protection Officer.

**Data Security and Privacy by Design**
We are committed to:

- Minimising data collection and retention
- Applying appropriate technical and organisational measures (e.g. encryption, secure storage)
- Completing Data Protection Impact Assessments (DPIAs) for policy or process changes
- Cybersecurity measures to protect our IT systems

**Sharing and Transferring Personal Data**

We may share personal data with:

- Payroll processors
- Clients (e.g. for audits)
- Regulatory bodies or law enforcement

All third parties must protect your data in line with our policies and data protection law.
We do not transfer data outside the European Economic Area (EEA) without appropriate safeguards.

**Your Responsibilities**

All staff must:

- Only access data required for their role
- Keep data secure and confidential
- Use strong passwords and lock computers when not in use
- Avoid unauthorised sharing or duplication of data
- Dispose of personal data securely
- Seek guidance from the DPO if unsure about data handling

**Data Breaches**

Any data breach must be reported to the DPO immediately.
If the breach is high risk, we may need to:

- Report to the ICO within 72 hours
- Notify affected individuals without undue delay

Failure to report or concealment of a breach may lead to disciplinary action.

**Subject Access Requests (SARs)**

You have the right to:

- Request access to your data (SAR)
- Have incorrect data corrected
- Request erasure or restriction of your data
- Object to processing or request data portability

SARs should be made in writing to the DPO. We will respond within one month, unless the request is complex.

**Data Subjects' Rights**

You have the right to:

- Be informed of how your data is processed
- Access, correct, erase, or restrict your data
- Object to data processing or direct marketing
- Data portability
- Not be subject to automated decision-making
- Be notified of data breaches
- Withdraw consent (if previously given)
- Lodge a complaint with the Information Commissioner's Office (www.ico.org.uk)

**Enforcement and Disciplinary Action**

Any employee who deliberately or negligently breaches this policy may face disciplinary action, up to and including dismissal. It is a criminal offence to destroy or conceal data subject to an access request.

**Monitoring and Review**

This policy will be reviewed annually or sooner in response to legal or operational changes.

**Document Control and Accountability**

- Effective from: 01/06/2025
- Approved by: Lisa Ridley
- Contact for queries:
  Lisa Ridley
  📞 0116 482 6500
  📧 lisa.ridley@berecruit.co.uk