

Hazel Tree Education Recruitment is committed to protecting the privacy and security of all personal data we process. This policy outlines how we comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all relevant data protection legislation.

This policy applies to:

- All employees, candidates, clients, and suppliers of the company.
- All personal data processed in connection with recruitment, placement, employment, and business operations.
- All methods of data processing, including electronic, paper, and verbal records.

1. Key Principles

In accordance with UK GDPR, the company adheres to the following principles when processing personal data. Data must be:

- Processed lawfully, fairly, and transparently.
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with these purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up-to-date.
- Stored for no longer than necessary.
- Processed securely, protecting against unlawful or unauthorised processing, loss, or damage.

2. Lawful Bases for Processing

Hazel Tree Education processes data using the following lawful bases:

- **Consent** (e.g., marketing preferences)
- **Contract** (e.g., processing candidate data for assignments)
- **Legal obligation** (e.g., safeguarding, payroll, right-to-work checks)
- **Vital interests** (e.g., in an emergency)
- **Public task** (where applicable in educational settings)
- **Legitimate interest** (e.g., maintaining business operations)

3. Personal Data We Collect

Depending on the role, we may collect:

- Contact details
- Employment history and references
- Qualifications and training
- Right-to-work documentation
- DBS disclosures and safeguarding information
- Payroll and financial information
- Equal opportunities data (optional)

Sensitive data (Special Category Data) is processed only where strictly necessary and legally permitted.

4. How We Use Personal Data

We collect and use personal data for:

- Recruitment, vetting, and onboarding
- Safeguarding and child protection compliance
- Matching candidates with suitable roles
- Communication with schools, candidates, and staff
- Legal and regulatory compliance
- Payroll and HR administration

Data is never sold to third parties.

5. Data Sharing

Personal data may be shared with:

- Schools and educational institutions for placement purposes
- DBS and safeguarding authorities
- Training, compliance, or auditing partners
- Legal or regulatory bodies when required by law

All third parties must comply with GDPR and sign data processing agreements.

6. Data Security

Hazel Tree Education ensures personal data is protected by:

- Secure systems and encrypted storage
- Access controls and role-based permissions
- Secure email and communication channels
- Password-protected files
- Training for all staff on data protection responsibilities

We do not keep copies of physical files.

7. Data Retention

Data is retained only for as long as necessary:

- Candidate recruitment files: up to 6 years after last engagement
- DBS certificates: one year after the last engagement
- Payroll records: 6 years
- Safeguarding records: in line with statutory guidance

Data is securely deleted once retention periods expire.

8. Right of Data Subjects

Individuals have the following rights:

- Right to be informed
- Right of access (Subject Access Request)
- Right to rectification
- Right to erasure (in certain circumstances)
- Right to restrict processing
- Right to data portability
- Right to object
- Rights related to automated decision-making

Requests must be responded to within one month.

9. Data Breaches

A data breach is any confirmed or suspected loss, unauthorised access, or disclosure of personal data.

Hazel Tree Education will:

- Immediately investigate the breach
- Take steps to minimise harm
- Report serious breaches to the ICO within 72 hours
- Notify affected individuals when required

10. Responsibilities

All staff and candidates must:

- Follow this policy and all data protection procedures
- Report data breaches immediately
- Handle personal information responsibly and professionally

Hazel Tree Education will:

- Provide training
- Maintain secure systems
- Ensure compliance with UK GDPR and all relevant laws

11. Review of Policy

This policy will be reviewed annually or sooner if legislation or company processes change.

Reviewed: September 2025

Next review: September 2026

Reviewed by: Liz Monks