

Privacy Notice



Company name:	The Edwin Group - Edwin Supply - Vision for Education / ABC Teachers / Smart Teachers
Document	Privacy Notice
Topic:	Data Protection
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Introduction

We are The Edwin Group ("us", "we", "our"), a limited company registered in England and Wales under registration number 1240603. Our registered office is at First Floor (South), Cathedral Buildings, Dean Street, Newcastle upon Tyne NE1 1PG. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of personal data under registration number ZB589488.

The Edwin Group includes our trading activities that are Vision for Education / ABC Teachers / Smart Teachers, referred to in this notice as "Edwin Supply", and it is to those specific trading activities that this Privacy Notice applies. Each entity is registered with the UK supervisory authority, Information Commissioner's Office ("ICO") in relation to our processing of personal data under registration numbers Z1460924, Z9150659 and ZA426450 respectively. Please read the following Privacy Notice which explains how we use and protect your personal information. This Privacy Notice applies to the use of all our services and websites (and web-based services) on which a link to this Notice appears (the "Sites").

For the purpose of the Data Protection Act 2018 and the UK General Data Protection Regulation (the "GDPR") (together, the "Data Protection Legislation"), we are the Data Controller in relation to personal data we process about you.

We take your privacy seriously and we are committed to keeping your information private. To the extent we are required by law, we have notified the United Kingdom's Information Commissioner's Office that we will process your personal information in accordance with the Data Protection Legislation (as defined above).

By providing us with any information about yourself (including via our websites and in branch), you understand that we will process your personal information in accordance with this Privacy Notice and our Cookies Notice.

This Privacy Notice covers:

1. What personal information we collect about you and how we collect it.
2. Our legal basis for collecting and using your personal information.
3. How we will use your personal data.
4. Personal information that we share with third parties.
5. Data retention, data security and transfers of personal information outside of the European Economic Area (EEA).
6. Your rights – Accessing, erasing and updating your personal information.
7. How to unsubscribe from any email alerts that you receive.
8. Changes to our Privacy Notice.
9. Legal and contact information.

1. Personal information we collect about you and how we collect it

Edwin Supply is a recruitment business which provides work-finding services for our clients and work-seekers. Edwin Supply must process personal data (including sensitive personal data) so that we can provide these services – in doing so, Edwin Supply acts as a Data Controller.

Information that you provide to us directly

We collect personal information whenever you contact us and provide us with information that we are able to identify you by, including when you contact us by phone, email or when you sign up to use any of our services. In particular, we collect information about you when you register and create an account, upload your CV, and every time you email us directly.

During the registration process, we will collect information via our website, during face-to-face interview and via our registration forms including:

- Name
- Date of birth
- Contact details (address, email address, telephone number)
- NI number
- Bank details
- CV (employment, qualifications and education history)
- Emergency contact details
- Medical details
- Professional registration membership numbers (e.g. TRA number)
- Right to work documentation
- Criminal record history

Information that we automatically collect (including use of “cookies”)

We collect personal data from website users through cookies and Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer to help analyse how you use the website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the USA. Google will use this information for the purpose of evaluating your use

of our website, compiling reports on your activity for us and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this your ability to use our website may be restricted. By using the website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

We automatically collect technical information about the device you use to visit our website, including your IP address, browser type/version and related settings. We also use cookies to monitor website use and how you interact with it.

For further information, please see our Cookies Notice and for more independent information about cookies, visit www.aboutcookies.org.

Information that we collect from third parties

Certain third-party partners of Edwin Supply and The Edwin Group may provide us with information relating to you. It is that third party's responsibility to ensure that it has obtained your consent to do this. However, where possible, we will request from our partners that they have the right to pass on this information. These third parties include:

- Jobs boards
- Referees
- DBS certificates via online DBS certificate processors
- Pre-employment checks including via the TRA and Update Service

Personal data of third parties provided by candidates

Edwin Supply receives personal data from candidates as part of the registration process, such as referees and emergency contacts.

We collect referee contact details in order to fulfil our Safer Recruitment responsibilities. We require the referee's name, contact details, and relationship to the candidate (e.g. former employer, personal referee, etc.)

We collect emergency contact details in order to fulfil our responsibilities to our candidates should an emergency situation occur while the candidate is at work. We require the emergency contact's name, contact details and relationship to the candidate.

We will only use the information that our candidates give us about emergency contacts and referees for its intended purpose. If you are named as an emergency contact, we will contact you in the case of an accident or emergency affecting them. If you were named by the candidate as a referee, we will contact you to obtain and discuss a reference.

Where appropriate and in accordance with legal obligations and regulatory requirements, we will share this personal data, in various ways and for various reasons, with the following categories of people:

- Any of our group companies
- Client schools and education providers

Business contacts

We host all personal data relating to contacts we liaise with in connection with our services through our wider group databases, and access to that data is made available to other companies within The Edwin Group and may be used for marketing and data analytics purposes. Further information regarding which companies are part of the Edwin Group and their privacy notices can be found in the [Edwin Group Privacy Notice](#).

2. Our legal basis for collecting and using your personal information

Data Protection Legislation mandates that any personal information can only be used where there is a lawful basis to do so. At Edwin Supply, we rely on one or more of the following grounds to legally collect and use your personal information:

- The data is necessary for the performance of the contract which we have with you (i.e. to provide our services to you)
- We are using your personal information where it is in our legitimate interests to do so
- We have a legal obligation to process your personal information
- You have consented to the use of your personal information by us

Where we rely on your consent to process any of your personal information, you may revoke your consent at any time. Any such revocation will not affect the lawfulness of any prior use of that personal information.

3. How we use your personal information

We will use your personal information to enable us to provide our services to you and enable you to use the Sites, including for the following purposes:

Performance of a contract

Your personal data is required by law and/or is a contractual requirement (e.g. our client may require this personal data). You are obliged to provide the personal data and if you do not, the consequences of failure to provide your personal data are:

- Edwin Supply will be unable to find you work as our clients require this information in order to comply with their Safer Recruitment practices.

Edwin Supply 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. The legal bases we rely upon to offer these services to you are:

- Processing is necessary for carrying out the Data Controller's obligations under employment, social security or social protection law, or a collective agreement, providing for appropriate safeguards for the fundamental rights and interests of the individual. This is on the understanding that you may be entering into a contract with us to provide work-finding services to you.

Legal obligation

We will use your personal information where we are legally obliged to do so, this includes:

- Establishing right to work
- Compliance with HMRC and taxation laws
- Compliance with all regulatory pre-employment checks for the education sector
- To maintain records as required under the Conduct of Employment Agencies and Employment Businesses Regulations 2003
- For financial reporting and auditing purposes
- Employment placement history
- For anti-money laundering or fraud prevention, detection and reporting
- To maintain records of actions taken on your account

To comply with the above, we collect the following special category data:

- Personal data revealing racial or ethnic origin via right to work documentation
- Biometric data (where used for identification purposes)
- Data concerning health

We always ensure that our processing is generally lawful, fair and transparent and complies with all the other principles and requirements of the GDPR. All special category data is obtained for the purposes of employment, social security and social protection (if authorised by law) and reasons of substantial public interest (with a basis in law) as per Article 9 of the GDPR, specifically relating to the safeguarding of children and of individuals at risk in accordance with Data Protection Act Schedule 1.

Legitimate interest

Where Edwin Supply has relied on a legitimate interest to process your personal data, our legitimate interest(s) is/are as follows:

- Edwin Supply is an employment business, which means, we have a commercial interest in finding work for our work-seekers in educational establishments. We will contact you regarding employment opportunities in line with your requirements.
- Edwin Supply will contact you about free training opportunities that you may be interested in attending. We have a legitimate interest to enhance the skills of our current workforce, to support your professional development and help you stay at the forefront of developments in the industry. Your data will not be shared with any third-party training provider without your prior consent.
- Edwin Supply will contact you to invite you to our free social events for staff. These events give you the opportunity to network with schools and other teaching and support staff and widen your professional contacts. Edwin Supply has a legitimate interest to create a more engaged community of supply staff who are loyal to Edwin Supply.

Consent

We will use your personal information where we have your consent to do so:

- Send specific marketing to schools or introduce you to a school
- Conduct status checks on your DBS through the update service
- Register you for Team Teach training services
- Approach any individual or organisation that The Edwin Group require/identify in order to obtain references to complete the registration process

It is your responsibility to ensure that any information submitted as part of the registration process is accurate and up-to-date. Should you wish to withdraw your consent at any time, please contact dpo@edwin.group.

4. Personal information that we share with third parties

In order to provide the services offered, we sometimes need to share your personal information with third parties. However, we will continue to be responsible for the usage and security of your personal information when this happens.

Edwin Supply will process your personal data and/or sensitive personal data with the following third-party recipients:

- Educational establishments for the process of providing work-finding services
- The Police and any child protection professionals in the event of an investigation into your conduct
- Other companies, governing bodies or government agencies in order to carry out checks, for investigative purposes or to provide services for the fulfilment of work-finding services as required
- A CCS Accreditation Body, e.g. APSCo, Recruitment and Employment Confederation, etc., for audit purposes

Your personal information may be disclosed to any company within the Group, for the purposes of processing that personal information, using appropriately secure methods, for services being provided.

As part of the registration process, you may be required to register with our Candidate Registration Portal. If this is the case, the following information will be provided to Llama ID:

- Name
- Email address

Relevant employees within the Edwin Group will have access to your profile on Llama ID for compliance purposes.

Llama ID may also share your details with the following third parties:

- Yoti – for the purposes of ID verification
- Credas – for the purposes of ID verification

- First Advantage – for the purposes of processing a DBS certificate
- DBS update checking service – for the purposes of checking your DBS update service status

You will be required to agree to the above third parties' Terms and Conditions in order to register.

As part of the registration process, we may need to apply for a new DBS certificate for you. If this is the case, the following information will be provided to eSafeguarding to process the DBS application:

- Name
- Email address

In order to verify your qualifications, we may be required to provide limited personal information to regulatory or awarding bodies.

In order to offer additional services to you, The Edwin Group will, with your consent, share minimal personal data with the following third-party recipients:

- Team Teach

In order to complete relevant safeguarding and child protection courses required for our registration process, and for any further training needs identified during your work with the company, minimal personal data (name and email address) will be shared with our safeguarding training provider.

Should you wish to work as an online tutor, you will be required to register with our online tutoring platform Tutexa and you will be asked to provide the following information:

- Name
- Address
- Email address
- Date of birth
- Mobile number

This platform is completely separate from our own systems and database and you will be required to agree to Tutexa Terms and Conditions in order to register.

Some of our branches work with other agency education providers in a Master Vendor Supplier agreement, where an external agency has been appointed by its clients to coordinate and manage the procurement of the services of non-permanent staff from staffing agencies, including ABC Teachers and Vision for Education, for onward supply via the external agency to its clients.

Staff successfully confirmed for these bookings will be asked to give their written consent to provide the following information to the Master Vendor agency for the purposes of fulfilling the booking:

- Name
- Date of birth
- Job role
- Photo
- DBS number, issue date, and expiry date (if applicable)
- References received dates
- Medical reasonable adjustments required (if applicable)

- Confirmation ABC Teachers/Vision for Education has completed compliance checks on the candidate to the required standard

Personal data will not be transferred to a Master Vendor agency for any candidate who has not given prior written consent. Any candidate who has given consent must withdraw this consent in writing.

Other circumstances where we share or use your personal information

In certain circumstances, we may be required by law to disclose your personal information to third parties such as government bodies, law enforcement agencies and data protection regulators.

We provide outgoing employment and financial references, on request. You must confirm your consent in writing before a financial reference is provided to a requestor.

5. Tutoring Provision

Online and out-of-school tutoring

For online tutoring, Edwin Supply uses online tutoring platform Tutexa.

Tutor accounts and school/guardian accounts are set up directly by the tutors and schools/guardians. An Edwin Supply consultant will send a link to setup. All pupil accounts are set up by the pupil's guardian/school.

The 'Messages' data for all tutoring sessions is always available for The Edwin Group to review within the Tutexa platform. Video and audio data is available by request of The Edwin Group to Tutexa. This is for the safeguarding of both pupils and tutors.

For further information, please see Tutexa's Privacy Notice which will be visible on login to the platform.

Face-to-face out-of-school tutoring can take place in a variety of locations, including the pupil's home address, a public location, or an education provider such as a school.

Edwin Supply's usual data assurances contained within its Terms of Engagement with all tutors, and within its Terms of Business with all clients, apply to these arrangements.

Pupils

All tutoring data will be kept securely within our systems, or on Tutexa, and will only be used for the purposes of providing a tutoring service. This data will be transferred securely to the pupil's assigned tutor in order to assist them in providing effective tutoring to the pupil. All pupil data, alongside any tutoring session information, will be deleted after a period of one year following the end of the tutoring arrangement. Edwin Supply will take further action as may be necessary or desirable to ensure our compliance with data protection legislation. For further information, please see the 'Tutoring Code of Conduct and Privacy Notice for Pupils'.

Any tutoring arranged by education providers with Edwin Supply tutors may necessitate limited transfer of pupil data from the education provider to Edwin Supply, who will be obliged to transfer

this data to the billing authority. This is due to the need of the billing authority to identify the funding source for the pupil's tutoring, for example, if the pupil receives extra tutoring through funding awarded by an Education and Health Care Plan (EHCP). The data transferred in these cases is limited to the minimum required and is retained under Edwin Supply's data retention policy.

Schools & Guardians

Personal data of parents/carers/ guardians of pupils receiving tuition may be collected where it is appropriate in the situation, including but not limited to names and contact details; for example, where tutoring sessions are taking place in the pupil's home, or where the pupil does not attend school. All data is kept securely.

For further information, please see the 'Tutoring Code of Conduct and Privacy Notice for Parents and Carers of Pupils'.

National Tuition Programme (NTP)

Edwin Supply collected data for pupils, schools, guardians and tutors engaged in tutoring sessions via the NTP between 2020 and 2021. Specific data was collected as instructed by the NTP and it has now been erased from Edwin Supply's computers, storage devices and storage media.

It was collected, processed and shared in line with the following policies:

- NTP Privacy Notice for Parents and Carers of Pupils
- NTP Privacy Notice for KS4 Pupils

These are available on request from dpo@edwin.group.

Tribal Tutors are the auditing body for our current arrangement to provide tutoring under the National Tuition Programme. Tutor data is shared with Tribal Tutors as part of the auditing process but this is anonymised and no tutor can be identified from the data by Tribal Tutors.

6. Data retention, data security and transfers of personal information outside the UK

Edwin Supply will retain your personal data only for as long as is necessary. Different laws require us to keep different data for different periods of time. Please contact us if you have any queries about our retention periods.

The Conduct of Employment Agencies and Employment Business Regulations 2003 require us to keep work-seekers' records for at least one year from:

- a) The date of their creation, or
- b) The date on which we last provide you with work-finding services

We must also keep your payroll records, holiday pay, sick pay and pensions auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation.

We retain personal information for as long as we reasonably require it for legal or business purposes. Edwin Supply offer work-finding services including permanent placements where the length of

service is significantly longer, so our data retention period is greater. With this in mind, your information will not be kept for longer than 7 years after your last day of work, or from the date you were cleared to work, whichever is longer. Please note that we may be required, in certain circumstances, to retain your information indefinitely (for example, under child protection legislation).

We will take all necessary steps to ensure that the privacy of information is maintained for the period of retention.

Overseas transfers

We take steps to protect your personal information from unauthorised access and against unlawful processing, accidental loss, destruction, and damage. We will only keep your personal information for as long as we reasonably require and for the activities we have detailed above. This means we will retain personal information for the duration of any contract we have with you, in line with any legal obligation for data retention (such as that for HMRC) or, primarily, until erasure is requested by you.

Your personal data may be processed outside of the UK. This is because some organisations and employees we use to provide our services to you are based outside of the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your personal data is only processed in a country which the Secretary of State has confirmed as an adequate level of protection (an adequacy regulation), or
- We enter into an International Data Transfer Agreement ("IDTA") with the receiving organisation and adopt supplementary measures, where necessary.

7. Your rights

You have certain rights in relation to the processing of your personal data, including:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purposes and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a "Subject Access Request")
You have the right to receive a copy of the personal data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the "Right to be forgotten")
You have the right to ask us to delete your personal data.
- **Right to object to processing**
You have the right to object to us processing your personal data. If you object to us using your personal data for marketing purposes, we will stop sending you marketing material.

- **Right to restrict processing**
You have the right to restrict our use of your personal data.
- **Right to portability**
You have the right to ask us to transfer your personal data to another party.
- **Automated decision-making**
You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your personal data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
You have the right to lodge a complaint with the relevant supervisory authority if you are concerned about the way in which we are handling your personal data. The supervisory authority in the UK is the Information Commissioner's Office, who can be contacted online at: <https://ico.org.uk/global/contact-us/> or by telephone on 0303 123 1113.

Should you have any queries or complaints in relation to how we use your information, please in the first instance contact us via the details set out in Section 9 below.

8. How to unsubscribe from any email alerts you receive

If you have elected to receive information about our products or services, or the products or services offered jointly with or on behalf of other organisations, and/or "alerts" from us via email (for example, by creating an email alert for a job) and would like at any time to unsubscribe from this service, please email us at dpo@edwin.group or click on the "unsubscribe" link at the bottom of any email.

9. Changes to our Privacy Notice

Edwin Supply may amend this Privacy Notice at any time and where we make material changes to it, we will provide notice on our website. By continuing to use our services and/or our Sites, you agree to the updated Privacy Notice. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) our services and/or our Sites.

10. Legal and contact information

The registered office of The Edwin Group is:

First Floor (South), Cathedral Buildings,
Dean Street, Newcastle-upon-Tyne,
NE1 1PG

Privacy Notice



We will use all reasonable efforts to answer any questions or resolve any concerns regarding your privacy promptly.

All comments, queries and requests relating to our use of your personal information are welcomed (including in relation to transfers of personal information outside the EEA). If you would like to contact us, queries should be addressed to the Data Protection Coordinator at the above address, or by email at dpo@edwin.group.