



GDPR – Data Protection Policy

Policy Statement

The purpose of this policy is to ensure that everyone handling personal information at Tatton Recruitment Group Ltd is aware of the requirements of the GDPR, complies with data protection procedures and protects the rights of data subjects as outlined by the GDPR.

Tatton Recruitment Group Ltd is committed to ensuring that personal data is handled in accordance with the principles and requirements of the GDPR. This policy applies to all employees, contractors, and stakeholders of Tatton Recruitment Group Ltd.

Our position is that privacy is essential, valuable and it matters; failure to protect business and personal information can have profound consequences such as violation of individuals' privacy, loss of trade secrets, loss of business/clients, litigation/claims, and penalties from authorities.

Policy Scope

The General Data Protection Regulations and the Data Protection Act 2018 regulate the processing of personal data and protect the rights and privacy of individuals.

The GDPR applies to the processing of personal data that is:

- Wholly or partly by automated means; or
- Non-automated processing of personal data which forms part of, or is intended to form part of, a filing system

In order to provide recruitment and payroll services Tatton Recruitment Group Ltd is required to collect and use personal information from the people that are employed directly by us, contract for us or use our services.

Personal data refers to any information relating to an identified or identifiable natural person ('data subject'). This includes, but is not limited to, names, contact information, identification numbers, location data, or factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

This policy applies to all personal data processed by Tatton Recruitment Group Ltd, including the collection, storage, use, transfer, and destruction of such data, in both electronic and manual formats. Personal data held by Tatton Recruitment Group Ltd may include, but is not limited to, contact information for stakeholders, clients, and candidates, as well as other personal details required to deliver our services.

Responsibility for the policy

We expect all individuals working with us to maintain the standards outlined in this policy. It is the responsibility of line managers to ensure that individuals are aware of the expected standards and conduct themselves accordingly. Disciplinary measures shall be enforced against any individual who is found to be in breach of these principles.

Tatton Recruitment Group Ltd will ensure that:

This policy is available to each member of colleagues

Everyone managing and handling personal information is appropriately trained

Queries about handling personal information are promptly and courteously handled

All colleagues must be aware of the GDPR requirements and understand how these apply to their role.

- Colleagues must complete mandatory GDPR training
- Additional information on our internal processes for GDPR is available via our QMS

- Colleagues are responsible for ensuring that personal data is processed in accordance with this policy and the GDPR, including maintaining confidentiality and securing data
- Disclosure of confidential information to unauthorised third parties will be considered gross misconduct and may lead to disciplinary action
- Colleagues must adhere to the company's data retention schedules and ensure that personal data is retained only as long as necessary
- Colleagues must adhere to the clear screen policy detailed in internal guidelines - computer screens should not be left open when unattended and passwords must not be shared with others
- Colleagues must adhere to the clear desk policy detailed in internal guidelines
- All colleagues must report any data breaches immediately to the Data Protection Team, following the company's data breach reporting procedures
- Care must be taken when sending personal data via email to ensure that only authorised recipients receive it, and that the data is encrypted or password-protected where appropriate
- When disposing of personal data, colleagues must ensure that the disposal method is secure and appropriate, such as shredding paper documents or securely deleting electronic files

For further advice or information email gdpr@tattonrecruitmentgroup.com

Responsibilities Under GDPR

Tatton Recruitment Group Ltd is registered as a data controller on the register kept by the Information Commissioner's Office. Tatton Recruitment Group Ltd is the 'data controller' under the terms of the GDPR, meaning it is responsible for determining the purposes and means of processing personal data.

The principles of the GDPR require that personal information must:

- Be processed fairly, lawfully and transparently
- Be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- Be accurate and where necessary, kept up to date
- Not be kept longer than necessary for the purposes for which the personal data is processed
- Be processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage
- Not be transferred to a country outside the European Economic Area (EEA) unless that country has adequate data protection measures in place, or where specific conditions have been met under the GDPR

In order to meet these principles, Tatton Recruitment Group Ltd will:

- Fully observe conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purpose for which information is used
- Collect and process appropriate information only to the extent necessary to fulfill operational needs or comply with legal requirements
- Retain personal information only for as long as is necessary for the relevant purpose
- Ensure that data subjects can fully exercise their rights under the GDPR, including the right to be informed about processing activities, the right of access to personal information, the right to rectification, and the right to erasure
- Implement appropriate technical and organizational security measures to safeguard personal information
- Ensure that personal information is not transferred outside the EEA unless suitable safeguards are in place, such as standard contractual clauses, binding corporate rules, or an adequacy decision from the European Commission.

Tatton Recruitment Group Ltd has appointed a Data Protection Team, led by the Head of Compliance, to monitor internal compliance, advise on data protection obligations and function as the main point of contact for data subjects and the Information Commissioner's Office (ICO).

The Data Protection Team's responsibilities include:

- Ensuring Tatton Recruitment Group Ltd's compliance with the GDPR and other data protection laws
- Conducting data protection impact assessments (DPIAs) where appropriate
- Providing training and guidance to colleagues on data protection matters
- Responding to data subjects' requests and complaints
- Consulting with the ICO on matters relating to data protection compliance

The Data Protection Team can be contacted at:

Head of Compliance, Tatton Recruitment Group Ltd, Stamford House, Northenden Road, Sale, Manchester, M33 2DH

Email: gdpr@tattonrecruitmentgroup.com

Privacy Notice

Tatton Recruitment Group Ltd is committed to protecting the privacy and security of all personal information. Our privacy notice details how we collect, use, and protect personal information, in accordance with the GDPR. The privacy notice is available on our company intranet and website and is issued to all candidates via email when they register to use our services, all data subjects are encouraged to review the policy to understand how their personal information is handled.

Data Protection Impact Assessments (DPIAs)

Tatton Recruitment Group Ltd will conduct Data Protection Impact Assessments (DPIAs) for new processing activities that are likely to result in an elevated risk to the rights and freedoms of individuals. The DPIA process will involve identifying and assessing the risks to individuals and implementing measures to mitigate those risks.

Subject access requests, requests to be forgotten and other data subject rights

Under the GDPR, individuals have the right to access personal information held by Tatton Recruitment Group Ltd, as well as the right to request the deletion, rectification, or restriction of processing of their data and the right to data portability.

Internal employees can request access to their personal information by emailing our People and Culture department at People&Culture@tattonrecruitmentgroup.com

Temporary workers and contractors can request access to their personal information and exercise their rights by emailing gdpr@tattonrecruitmentgroup.com

Requests will be responded to within one month of receipt. In cases where requests are complex or numerous, Tatton Recruitment Group Ltd, may extend the response time by a further two months, in which case the data subject will be informed within the initial one-month period.

The response will include:

- A copy of the personal data as requested
- The purposes of the processing
- The recipients or categories of recipients to whom personal data has been or will be disclosed
- The envisaged period for which the personal data will be stored

- The existence of the right to request rectification or erasure of personal data or to object to processing
- The right to lodge a complaint with the ICO

Data protection complaints procedure

Tatton Recruitment Group Ltd aims to comply fully with its obligations under the GDPR. If you have any questions or concerns regarding Tatton Recruitment Group Ltd, management of personal data, including your right to access data about yourself, or if you feel Tatton Recruitment Group Ltd, holds inaccurate information about you, please contact

Internal Employees can contact People&Culture@tattonrecruitmentgroup.com

Temporary workers and contractors can contact the GDPR team by e-mailing gdpr@tattonrecruitmentgroup.com.

Complaints will be acknowledged within five working days. We aim to resolve complaints within one month. If the issue is complex, we may extend the resolution period by up to two additional months, and you will be informed of any delays.

If you feel that your questions or concerns have not been dealt with adequately or that a subject access request you have made to Tatton Recruitment Group Ltd has not been fulfilled you can raise a formal complaint by contacting the Head of Compliance.

By Post to: Head of Compliance, Stamford House, Northenden Road, Sale, Manchester M33 2DH

By Email to: gdpr@tattonrecruitmentgroup.com

If you are still dissatisfied, you have the right to contact the office of the Information Commissioner, the independent body overseeing compliance with the GDPR; <http://ico.org.uk/>.

Data Breach Notification

In the event of a data breach, Tatton Recruitment Group Ltd will notify the ICO within 72 hours if the breach is likely to result in a risk to the rights and freedoms of individuals. Affected data subjects will also be informed without undue delay if the breach is likely to result in an elevated risk to their rights and freedoms. All breaches, regardless of their severity, must be reported to the Data Protection Team immediately.

Data Retention Periods

Tatton Recruitment Group Ltd is committed to retaining personal data only for as long as necessary to fulfill the purposes for which it was collected, in accordance with our legal obligations and operational needs. A detailed schedule of retention periods for different categories of data is maintained (appendix 1) and regularly reviewed to ensure compliance with GDPR. After the retention period expires, personal data will be securely deleted or anonymized, unless further retention is required by law.

Communication and Awareness of this Policy

Colleagues have access to this policy via our QMS intranet and annual training is provided. The policy is reviewed on an annual basis as a minimum or if there are legislative amendments, any changes are communicated to colleagues.

Compliance

All colleagues must ensure that they read, understand and comply with this policy and its supporting documents.

Supporting Documents

Tatton Recruitment Group Ltd Staffing maintains the following additional policies relating to GDPR and Data Protection

- GDPR Compliance Statement
- GDPR Data Breach Policy
- GDPR Guide
- GDPR Summary

Appendix 1 - Records Retention Schedule

Health and Safety Records

Type of Record	Recommended Retention Period	Reason for Length of Period
Pre-Employment Health Questionnaire	During employment plus 3 years	Management of Health and Safety at Work Regulations 1999
Occupational Health Records- health surveillance and medical records relation to risk assessments or incidents occurring at work.	40 years	Management of Health and Safety at Work Regulations 1999
Accident books, and records and reports of accidents	3 years from of date of the last entry	Social Security (Claims and Payment) Regulations 1979; RIDDOR 1985
Accident records/reports for any reportable work accident, death or injury	Statutory retention period: At least 4 years from the date the report was made (or until any younger person involved in the accident reaches 21)	The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended, and Limitation Act 1980
Health and Safety representatives and employees' training	5 years after employment	Health and Safety (Consultation) Regulations 1996; Health and Safety Information for Employees Regulations 1989
First Aid Training	6 years after employment	Health and Safety (First Aid) Regulations 1981
Fire Warden Training	6 years after employment	Fire Precautions (Workplace) Regulations 1997
Night workers health assessments	Records to show health assessment records for night workers should be kept at least three years after the relevant period	Working Time Regulations 1998

Accounting Records

Type of Record	Recommended Retention Period	Reason for Length of Period
Accounting Records	6 years	Section 221 of the Companies Act 1985 as modified by the Companies Acts 1989 and 2006
National minimum wage records	6 years after the end of the pay reference period following the one that the records cover	National Minimum Wage Act 1998 and The National Minimum Wage (Amendment) Regulations 2021

Payroll wage/salary records (also overtime, bonuses, expenses, benefits in kind)	3 years after the end of the tax year to which they relate, given their potential relevance to pay disputes seven years after employment ends can be justified	Taxes Management Act 1970
Statutory maternity pay records and calculations	6 years after end of the financial year to which the records relate	Statutory Maternity Pay (General) Regulations 1986
Statutory sick pay records and calculations	6 years after end of the financial year to which the records relate	Statutory Sick Pay (General) Regulations 1982
Wages and salary records	6 years after end of the financial year to which the records relate	Taxes Management Act 1970
Invoices	7 years	Statutory requirement – HMRC
Timesheets	7 years	Statutory requirement – HMRC
Manager Approvals	7 years	Statutory requirement – HMRC
Credit control documents	7 years	Statutory requirement – HMRC
Supplier Records	7 years	Statutory requirement – HMRC

Employee Records

Type of Record	Recommended Retention Period	Reason for Length of Period
Facts of Employment (dates, positions held etc.)	7 years from the end of employment	Provisions of references and requests for confirmation of employment
Personnel files excluding information on disciplinary or grievance (including health info, applications, references)	7 years from the end of employment	Provisions of references and potential litigation
HR Database & Payroll Records including income tax and national insurance	6 years after end of the financial year to which the records relate	Income Tax (Employment) Regulations 1993
Special category or personal data consents	Consents for the processing of special categories of personal and sensitive data should be retained while the data is being processed.	Keeping the consents may be justified for six to seven years after employment end
Applicants Declined (no interview)	6 months	Feedback to applicants. Time limits on litigation
Applicants Declined (interviewed)	12 months	Feedback to applicants. Time limits on litigation
Unsuccessful applicant details	12 months	Feedback to applicants. Time limits on litigation
Oral/verbal warning	6 months	In Accordance with Disciplinary & Grievance policy
First Written Warnings – including notes of disciplinary hearings on file	6 months	In Accordance with Disciplinary & Grievance policy

Documentation relating to grievance and disciplinary hearings (notes, reports, etc.)	2 years	Allows for appropriate appeal mechanism and monitoring future grievances and disciplinary
Final written warnings (subject to satisfactory conduct and performance)	12 months	In Accordance with Disciplinary & Grievance policy
Redundancies less than 20	6 years from date of redundancy	Time limits on litigation
Redundancies 20 or more	12 years from date of redundancy	Limitation Act 1980

Temporary Worker / Contractor and Permanent Candidate Records

Type of Record	Recommended Retention Period	Reason for Length of Period
Registration forms / CV / Assignment details / Compliance Checks / RTW for candidates who have worked	7 years	Statutory requirement - HMRC Asylum and Immigration Act Audit purposes – Client audits
Termination Records	7 years from the end of employment	Statutory requirement – HMRC
Inactive contractor records (where the person has worked)	7 years	Statutory requirement – HMRC
Inactive records Candidates who have not worked or been placed	2 years from last contacted	Service delivery Internal deletion process
Surveys / feedback	2 years	Service delivery