



**CRA Consulting LTD (the  
Company) Privacy Policy**

<b>Company Name:</b>	CRA Consulting LTD ('the Company')
<b>Company Contact details:</b>	Caroline Naylor CRA Consulting LTD, 51 CLARKEGROVE ROAD, SHEFFIELD, S10 2NH
<b>Document DP5A</b>	Privacy Notice (when personal data is obtained directly from the data subject)
<b>Topic:</b>	Data protection
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

### **1. Data Protection Principles**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.



## **2. The kind of information we hold about you**

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter and/ or application form.
- Any information you provide to us during an interview.
- Any other documents or information provided during the selection process.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

## **3. How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agency if this is how you came to us
- Disclosure and Barring Service (DBS)
- Your named referees

## **4. How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.



It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

We will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role or possibly also offer you a second interview or assessment day as may be appropriate for the particular role. If we decide to offer you the role we will contact DBS and also make enquires with references. If you have not included the most recent employer you have had we will need to know why this is the case.

#### **5. If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

#### **6. How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during any tests or interview or to documents that we send to you.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- Criminal conviction information may be used to determine whether or not we would be able to offer you a role if you were successful.

#### **7. Information about criminal convictions**

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the any work (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.



### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **8. Collection and use of personal data**

### **a. Purpose of processing and legal basis**

The Company 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. This includes for example contacting you about job opportunities, assessing your suitability for those opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us, We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

The legal basis we rely on to offer these services to you are :

- Consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have with you
- To fulfil a contractual obligation we have with you

### **b. Legitimate interest**

This is where the company has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Key areas in legitimate interest would be :

- Managing our database and keeping work-seeker records up to date;
- Contacting you to seek your consent where needed;
- Providing work-finding services to you, including sending information to our clients where you have demonstrated an interest in doing that particular type of work but not expressly consented to you passing on the cv;
- Contacting you with information about similar products or services that you have used recently

We would not expect the time period before Consent is received to be more than 30 days.

### **c. Recipients of data**

The Company will process your personal data and sensitive personal data with our clients and with trusted third parties whom we have retained to provide services that you or our clients have requested such as qualification, criminal reference and reference checking services and skill tests. The details you have provided may also be verified with relevant third party sources on an as required basis.



#### **d. Statutory/contractual requirement**

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

- Job offers from clients could be restricted
- Our ability to seek relevant job opportunities for you could be compromised

#### **9. Data retention**

The Company 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.

The Conduct of Employment Agencies and Employment Businesses Regulations 2003, require us to keep work-seeker records for at least one year from (a) the date of their creation or (b) after 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.

Where the Company has obtained your consent to process your personal and sensitive personal data, we will do so in line with our retention policy which means a period of 1 years. Upon expiry of that period the Company will seek further consent from you. Where consent is not granted the Company will cease to process your personal data and sensitive personal data.

#### **10. Your rights**

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting Caroline Naylor at our registered office.

Our full privacy policy is available on our website at <https://www.craconsultants.com/>



**11.Complaints or queries**

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Caroline Naylor, at CRA Consulting LLP, telephone number 0114 241 8030 or email to [info@craconsultants.com](mailto:info@craconsultants.com)

You also have the right to raise concerns with Information Commissioner’s Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.

Caroline Naylor  
CRA Consulting LTD  
51 CLARKEGROVE ROAD  
SHEFFIELD  
S10 2NH

I, \_\_\_\_\_ (candidate name), acknowledge that on \_\_\_\_\_ (date), I received a copy of CRA Consulting Limited Candidate Privacy Notice and that I have read and understood it.

Signature

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Name

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