



Company Name:	Vine Recruitment Solutions Ltd
Policy No.	Privacy Policy and Data Protection v2 May 2018
Policy Name:	Privacy Policy and Data Protection
Date Reviewed:	May 2020
Version:	V1

Data Protection

VINE is a recruitment business which provides work placements to its clients and job seekers.

VINE must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the VINE acts as a data controller.

Agency Worker may give their personal details to the VINE directly, such as on

- an application or registration form
- via our website
- we may collect the information from another source such as a jobs board.

VINE must have a legal basis for processing Agency Worker's personal data for the purposes of providing them with work placement and/or information relating to roles relevant to them.

Privacy Policy

In May 2018, the law changed about how employers record, store and use individuals' personal data. Previously the Data Protection Act covered how this was managed but the new GDPR law means VINE has to change some of working practices.

VINE need to collect and hold data about Agency Worker to enable them to employ and process tasks like your wages. The GDPR law places a new obligation on VINE an employer to tell Agency Worker in more detail why VINE collect their data, what it does with it and how long VINE expect to retain it. VINE also need to ensure Agency Worker is fully consenting to this data being collected.

VINE hold personal and special data about Agency Workers in order that they can process employment agreement. Agency Workers are entirely in control of their decision to give consent to VINE's use of their data for engagements of work and processing of pay. There will be not repercussions if an Agency Worker chooses to withhold consent. However, without some data VINE might not be able to make a decision on their suitability for employment or comply with the law and therefore VINE may not be able to make an offer of employment or assignment to work.

Purpose of Processing and Legal Basis

VINE will collect Agency Worker personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing them with work placement. The legal bases VINE relies upon to offer these services to Agency worker is a ‘Legitimate Interest’.

Legitimate Interest

VINE’s legitimate interest to process Agency Worker personal data for the performance of an agreement with them or in order to take steps at Agency Worker’s request to enter into an agreement to find work placements for them.

The specific data VINE wishes to obtain, and hold is as follows:

	Type of data	Why I wish to hold it	How long it will be kept for
1	Recruitment data: Previous experience Skills and qualifications	This will allow me to make a decision on your suitability for employment	Data will be kept for duration of your employment with me. When your employment is completed, it will be destroyed after 6 months.
2	Recruitment data: convictions This is classed as ‘special’ data under GDPR and is more strictly controlled	This will allow me to make a decision on your suitability for employment	Data will be kept for duration of your employment with me. When your employment is completed, it will be destroyed after 6 months.
3	Your personal details: Name, address etc.	This enables me to comply with the law and maintain correct employment records	Data will be kept for duration of your employment with me When your employment is completed, it will be destroyed after 6 months.
4	Next of kin and their contact details	If there is an accident then I can contact your emergency contacts	Data will be kept for duration of your employment with me When your employment is completed, it will be destroyed after 6 months.
5	Health / disability information and details of your GP This is classed as ‘special’ data under GDPR and is more strictly controlled	So that I am aware of any medical issues you may have, can make provision for these in your work and know who to contact if you have a medical episode	Data will be kept for duration of your employment with me When your employment is completed, it will be destroyed after 6 months.
6	Financial information: Bank details Tax codes NI number etc.	This will allow me to comply with the law and register you as an employee with HMRC and share with HMRC how much I pay you. It will also allow me to pay you.	Data will be kept for the duration of your employment with me When your employment is completed, it will be destroyed after 6 months. (HMRC may keep the data for up to 7 years).
7	Financial information: Tax codes	I will need to share this information with my	Data will be kept by payroll provider for 7 years.

	NI number etc.	payroll service in order that they can calculate what I need to pay you.	
8	Financial information Bank Details, salary payments	I will need to share this information with the Holding account provider so that they can pay your salary to you on my behalf (delete if don't use the holding account)	Data will be kept by Holding account provider for 7 years.

Sharing of data

VINE will need to share Agency Worker data with third party outside agencies such as our clients for the purposes of work engagements in support of Agency Worker skills and compliance.

- HMRC – see above
- Payroll Service - (Quick Books Online)
- Geometric Results International
- Clients (Care Homes, Supported living houses, etc)
- Invoice Simple for Self Employed Agency Workers

If an Agency Worker leaves VINE employment, their data will be destroyed after 6 months, or if longer this is stated above.

Agency Worker's Rights

Agency Worker have the following data protection rights:

- The right to be informed about the personal data the Company processes on them
- The right of access to the personal data the Company processes on them
- The right to rectification of your personal data
- The right to erasure of their personal data in certain circumstances
- The right to restrict processing of their 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.

VINE Data Controller is Zororo Mubaya and can be contacted directly if agency worker has any questions or concerns about their data on;

zororo@vinerecruitmentsolutions.co.uk

01865481428

07848149924

If Agency worker is dissatisfied with how VINE use their data, the Agency Worker can make a complaint to the government body in charge (Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or online at www.ICO.org.uk)