



CA Case Management Ltd

Privacy Notice

CA Case Management Ltd takes its Data Protection responsibilities seriously and we are committed to using the data we hold in accordance with the law. The following explains how and why we collect your personal data and what we plan to do with it as well as outlining your privacy rights under GDPR. Please read the following carefully to understand our practices regarding your personal data.

Data Controller

CA Case Management Ltd (Company Registration Number 6915609 and Information Commissioner's Office "ICO" Registration Number Z9720207)

Address: 26-28 Church Street, Saffron Walden, Essex, CB10 1JQ

Telephone: 01799 540734

www.cacm.co.uk

If you have any queries about this privacy notice or wish to exercise any of the rights mentioned in it please contact office@cacm.co.uk

Definitions

"Candidates" includes applicants for all roles advertised by CA Case Management Ltd including permanent, contract and temporary positions.

"Employees" includes people directly or indirectly employed or whose work is managed by CA Case Management Ltd.

"Clients" while it speaks for itself, this category covers our clients and others to whom CA Case Management Ltd provides services to in the course of its business.

"Data Controller" means a person who determines the purposes for which any personal data are to be processed.

"General Data Protection Regulation (GDPR)" a European Union statutory instrument which aims to harmonise European data protection laws. It has an effective date of 25th May 2018, and any references to it should be construed accordingly to include any national legislation implementing it.

"Personal Data/Information" means information that is about you or from which we can identify you.

"Processing" means obtaining, recording or holding any data or carrying out any operation on the data including erasure, disclosure, retrieval or alteration.

"Sensitive data" means personal data consisting of information as to racial or ethnic origin, sexual life, physical or mental health, religious beliefs, political opinions and any proceedings for offences committed.

"Suppliers" refers to partnerships and companies who provide services to CA Case Management Ltd.

Personal Data We May Collect

We will collect personal data on candidates, employees, clients, suppliers, referees, emergency contacts. We will only ask you to provide data which we consider essential to supplying case management services and managing your employment effectively.

Data collected may include (but is not limited to):

Candidate and Employee Data:

- Name
- DOB
- Photograph
- Contact details
- Gender
- Marital Status
- Right to work in the UK – passport/identity card/birth certificate
- Education details
- Employment details
- Tax related information (NI)
- Referee details
- Nationality
- Work permit details
- Banking/Financial information (for background checks or to process payroll)
- Criminal conviction details (if required)
- Disability-related information
- Details about your current benefits/salary arrangements
- Information your referees choose to tell us

Client Data: (information required in providing case management services)

- Name
- DOB
- Photograph
- Contact details
- Gender
- Marital Status
- Education details
- Employment details
- Tax related information (NI)
- Nationality
- Financial information
- Disability-related information and medical history
- Information your instructed solicitor/Deputy chooses to tell us

Supplier Data/Referees/Emergency Contacts:

- We collect details from contacts within your organisation (name, phone number, address email)
- Bank details so payments can be arranged
- Emergency contacts and referee details (name, email, phone number)

How Data is Collected

Candidate/Employee Data:

We will collect candidate/employee data in the following ways:

- Directly from you:
 - Entering your details on an application form
 - Applying for jobs through a job site
 - Emailing your CV to us
 - Being interviewed by a CA Case Management Case Manager/Employee
 - Completing and returning paperwork following an offer of employment
 - In the course of the management of your employment (e.g. annual appraisal and supervision)
- Other sources:
 - Referees may disclose information about you
 - Instructed solicitor/Deputy working on behalf of our clients
 - Clients
 - Managed service providers (MSP) may share information

Client Data:

We will collect client data in the following ways:

- Directly from you:
 - Where you proactively contact us by telephone/email/post
 - At initial assessment and throughout the case management process and ongoing services
- Other sources:
 - Instructed Solicitors/Deputies instructed to act on your behalf
 - Family members acting on your behalf and with your consent
 - Therapists or other professionals involved in your care
 - Managed service providers (MSP) may share information

Why Data is Collected

We use it in a number of ways:

- Recruitment activities: to help candidates find employment and fulfil contractual agreements with our clients
- As necessary to manage your employment effectively and for our own legitimate interests and/or those of persons and organisations related to your employment
- As necessary to provide effective case management services and for our own legitimate interests and/or those of persons and organisations related to your service provision
- Make contact in the case of an emergency
- As necessary to comply with legal obligations e.g.
 - For compliance with legal and regulatory requirements and related disclosures

- To verify your identity
- In the course of the management of your employment in order to comply with UK regulatory practice guidelines
- Based on your consent e.g
 - When you request that we disclose your personal data to other people or organisations, for example payroll/DBS providers, referees

Who Personal Data is Shared With

Where appropriate, we may share your personal data with:

- Clients to introduce candidates to them
- Candidates to arrange interviews and employment
- Employees as part of their employment
- Instructed Solicitors/Deputies working on our Client's behalf.
- Instruction Solicitors/Deputies working on behalf of you as a Client
- Case Managers and CA Case Management Ltd office staff who are directly involved in your employment
- Case Managers and CA Case Management Ltd office staff who are directly involved in the case management services you receive
- Third part service providers who perform functions on our behalf (including accountants, lawyers)
- Payment or other financial service providers (e.g. debt recovery teams, HMRC, payroll providers)
- Companies and other persons providing services to us related to your employment (e.g. DBS providers/Regulatory Authorities)
- Third party outsourced IT providers where we have a processing agreement in place
- Managed Services Providers as part of our client's arrangements
- Individuals or organisations who hold information related to your reference or application to work (past employers)
- If CA Case Management merges with, or is acquired by, another business in the future we may share your data with the new owners
- Anyone else where we have your consent or as required by law

Your Rights

Here is a list of your individual rights under GDPR Laws (they do not apply in all circumstances):

- The right to be informed about the processing of your personal data
- The right to have your personal data corrected if it is inaccurate and to have incomplete personal data completed
- The right to object to processing of your personal data
- The right to restrict processing of your personal data
- The right to have your personal data erased (the "right to be forgotten")
- The right to request access to your personal data and information about how we process it
- The right to move, copy or transfer your personal data ("data portability")
- The rights in relation to automated decision making which has a legal effect or otherwise significantly affects you (we mention this right here for completeness but we do not carry out automated decision making and so in practice this right will not be relevant to you)
- The right to withdraw consent at any time

Please contact office@cacm.co.uk (or contact details at the top of this Privacy Notice) if you wish to exercise any of these rights if and to the extent that they are relevant.

Data Access Rights

You have the right to access information we are processing and obtain information about how we process it (subject access request). A copy will be sent to you no later than one month from when we received your request. We will not charge you for providing you with the information but may charge you a reasonable fee for supplying any additional copies.

Please apply using the reference Subject Access Request:

- By post to CA Case Management Ltd, 26-28 Church Street, Saffron Walden, Essex CB10 1JQ
- By email to office@cacm.co.uk

Please note that where the request is received via email, security checks will be conducted prior to release of any information.

Our legal basis for processing your data

We will collect and process your personal data (which may include sensitive personal data) for the purposes of providing you with employment or case management services. The legal basis we rely upon to offer you these services are:

1. Consent

Should we want or need to rely on consent to lawfully process your data we will request it in an appropriate manner and record your response on our system. "Opt-in" consent means you have given us consent freely without pressure, that you know what you are consenting to and that you have given positive and affirmative action in giving us consent.

You have the right to withdraw your consent to processing at any time, please email office@cacm.co.uk

2. Legitimate Interest

Under data protection law there are some circumstances where we may rely on a legitimate interest to process your personal data. We do this if we have a genuine and legitimate reason and we are not harming your rights and interests.

We don't think any of the following activities harm your fundamental rights – in fact, they help us to provide a more efficient service.

- In order for us to continue providing services to candidates, employees and clients we need to process your relevant data for internal administration including payroll and invoicing.
- We think it's reasonable to expect that if you've posted your information and CV on a job board or professional site, you are happy for us to collect the data you have shared in this way
- We introduce candidates to clients for employment and therefore the sharing of data is an essential part of this process in helping facilitate and manage your employment
- To allow us to make relevant job offers we think it's reasonable for us to process your data.

- We have our own obligations under the law and therefore may share your data in relation to tax collection, crime detection and litigation cases.
- For us to provide the best possible case management services to clients
- We store supplier data to enable to the receipt of services from you as well as financial details to pay you for your services
- As an emergency contact, we will use these details to contact you in the case of an emergency.
- As a referee, we use your personal data in order to contact you for a reference. This is a part of our quality assurance process and so we deem this to be necessary for our legitimate interests.

Third Party Websites

This privacy policy applies onto the personal data collected and processed by CA Case Management Ltd. We are not responsible for the privacy of any third-party websites or services.

Data Retention

CA Case Management Ltd will retain your personal data only for as long as we need it for our legitimate business interests, is consistent with the law and that you're happy for us to do so. Different laws require us to keep different data for different periods of time.

To ensure our data is accurate, we keep in touch with you so you can let us know of any changes to your personal data.

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

Client personal data is retained for the duration of case management service provision and for 7 years following cessation of case management services.

Employee personal data and contracts will be held for the duration of employment and then for 6 years after the last day of contractual employment.

Personal data relating to pensions auto-enrolment are kept for 6 years and payroll information is kept for 3 years plus the current tax year for relevant staff members.

In all other circumstances, if you have had no "meaningful communication" with CA Case Management Ltd for at least five years we will ensure that all your personal data is deleted. When we refer to "meaningful communication" we mean communication between us where you are actively engaging with our services (e.g. submitting your CV or discussing potential roles). After this period, it is likely your data will not longer be relevant for the purposes for which it was collected.

Cookies

CA Case Management Ltd uses 'Cookies' on the website. Cookies are small pieces of information stored by us on your computer which enable us to identify your computer when you access our website.

We use cookies to collect information in an anonymous form and to provide us with information about how many visitors use our site and where they come from. This helps us to improve our site.

We will not disclose information obtained by the use of cookies to third parties.

Cookies do not provide us with access to your computer or any information about you other than that which you choose to share with us. Cookies can also be controlled by functions within your browser.

Data Storage

All data is held in-house using various services. We do not store personal data outside of the UK. Data security is of great importance to CA Case Management Ltd and to protect your data we have put in place suitable procedures.

Changes to our Privacy Notice

CA Case Management Ltd reserves the right to amend this privacy notice as we deem necessary or as may be required to by law. Such modifications shall be effective immediately upon posting on our website. Any substantive changes will be announced on the site and a notification by way of email will be sent.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by CA Case Management Ltd please contact Carolyn Archibold office@cacm.co.uk 01799 540734

You also have the right to raise concerns with the ICO on 0303 123 1113 or at <https://ico.org.uk/concerns/> if you believe that your data protection rights have not been adhered to.