

## PRIVACY NOTICE

This Privacy Notice tells you what you can expect when the Frankham Consultancy Group Limited and its subsidiaries collect and process personal information. It applies to information we collect about and process to do with:

1. visitors to our website Frankham.com;
2. people who use our services;
3. people who supply services to us;
4. job applicants;
5. current and former employees.

### Visitors to our website

When a person visits [www.Frankham.com](http://www.Frankham.com) we use Google Analytics to capture standard internet log information and details of the behavioural patterns of visitors to our site. This information helps us discover which pages of our site people are visiting.

The information gathered does not identify anyone. No attempt is made to find out the identities of anyone who visits our website. Should we wish to use our website to gather information that identifies a person we will be clear and straightforward about this and inform you of how we will use it.

### Use of Cookies

A Cookie is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. They collect standard internet log information and visitor behaviour information. The information is used to track visitor use of the website and to can be used compile statistical reports on website activity. No personal information or location information is processed by the cookies used on our website.

You can set your browser to not accept cookies and they can be removed from your browser. However, without cookies, in a few case cases some of our website features may not function.

### Security & Performance

Our security and firewall systems ensure the security and integrity of our IT infrastructure, including our website. The systems process the IP addresses of visitors to our website.

### People who contact us via Social Media

We use the well-known social media applications and portals run by third party provider, twitter, facebook and LinkedIn, to engage with people. All the processing of information published by ourselves and followers, retweeters, takes place on those portals. All information that people submit (e.g. by retweeting, sharing, replying, connecting) is processed on those third party provider's infrastructure and is submitted at the persons own risk. No personal information other than what is published on those applications by other users and followers is available by Frankham.

## **People who email us**

Transport Layer Security (TLS) is used to encrypt and protect inbound email traffic. Our outbound emails use SMARTHOSTS to MIMECAST. We also monitor any emails sent to us, including file attachments, for viruses or malicious software. The responsibility rests with the sender to ensure that any email sent is within the bounds of the law.

## **People who use our Services**

Frankham offers various services to commercial and public sector, charities and non-government and Not-For-Profit organisations. We have to hold details of the people working within those organisations in order for us to market, tender and provide those services to them.

We only use those details to provide the service the organisation has requested us to provide and for other closely related purposes. For example, we may use information about people to contact them to arrange a business meeting, collect feedback on the level of service and their satisfaction, invite them to a related business or network event or seminar run by Frankham or to provide news and updates on our services.

When those details are entered onto our secure contact database the individual will be contacted to inform them that the details have been so entered and that they may be used to contact them for marketing and business development purposes. They will be given the option to indicate they wish to “opt-out/unsubscribe”. If the individual so indicates then their details will be removed from the database.

On an annual basis the marketing team will contact via email those registered on the database and confirm that they are happy for the data to be so recorded and they are invited to request they be “unsubscribed/opt-out”.

People have the right at any time to stop us from contacting them for marketing purposes.

If you no longer wish to be contacted for marketing purposes please email us at: [unsubscribe@frankham.com](mailto:unsubscribe@frankham.com) or write to us at: Group Technical Director, Frankham Consultancy Group, Irene House, Five Arches Business Estate, Maidstone Road, Sidcup, Kent, DA14 5AE.

## **People who supply services to us**

Frankham enters into contracts of supply with commercial organisations and individuals so that they may supply products and services to us that help us to market, tender and deliver our own services. We have to hold details of the people working within those organisations in order for them to provide services to us.

We only use those details to support the service the organisation is providing to us and for other closely related purposes. For example, we may use information about people to contact them to arrange a business meeting, invite them to a business event or seminar run by Frankham or to provide news and updates on our services.

When those details are entered onto our secure contact database the individual will be contacted to inform them that the details have been so entered and that they may be used to contact them for marketing and business development purposes. They will be given the option to indicate they wish to “opt-out/unsubscribe”. If the individual so indicates then their details will be removed from the database.

On an annual basis the marketing team will contact via email those registered on the database and confirm that they are happy for the data to be so recorded and they are invited to request they be “unsubscribed/opt-out”.

People have the right at any time to stop us from contacting them for marketing purposes.

If you are a supplier and no longer wish to be contacted for marketing purposes please email us at [unsubscribe@frankham.com](mailto:unsubscribe@frankham.com) or write to us at: Group Technical Director, Frankham Consultancy Group, Irene House, Five Arches Business Estate, Maidstone Road, Sidcup, Kent, DA14 5AE

### **Job Applicants**

All the information that you provide during the process will only be used for the purpose of processing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any information you provide during the recruitment process with any third parties for marketing purposes or store any information outside of the European Economic Area.

The information you provide will be held securely by us and/or data processors whether the information is in electronic or physical format.

The contact details you provide to us will be used to contact you to progress your application. We will use the other information you provide to assess your suitability for the applied for role.

Information we ask for from Job Applicants: We only ask for minimal personal information necessary to process your application and effectively assess your suitability for the role. You have the right to not provide the requested information, but it may affect your application if you do not.

You can apply for our advertised vacancies, or register your CV, by emailing us, using the email addresses specified in our website. We also use third parties, recruitment and headhunting agencies, to provide us with CVs of candidates who have submitted their details to them to help them find a role.

Those involved in the recruitment process, our Recruitment team, the role's Hiring Managers and support staff, our HR team will have access to all of this information. Our hiring managers shortlist applications for interview based on this information.

We might ask you to attend an interview or series of interviews, complete tests or occupation personality profile questionnaires, or a combination of one or more of these.

Should you be invited for interview we will ask for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. You will be asked to complete a criminal records declaration to declare any unspent convictions. We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work.

Those involved in the recruitment process, the role's Hiring Managers and support staff, our HR team will have access to all of this information.

You will also be asked at interview to provide equal opportunities and diversity information. Such information is not mandatory. It will not affect your application if you do not provide it to us. This information will not be made available to any staff outside of our HR and Recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

Information will be generated during the interview process both by us and you. For example, we might take interview notes based on our conversation and you may complete a technical test. We will collect and keep this information.

We may wish to retain your details for a period of up to 6 months following your interview(s), to allow us to contact you in the future should future roles arise, should your current application be unsuccessful. We will seek your written consent to do so during the interview process.

You have the right to not give consent and in which case the personal information we have collected from you during the process will be destroyed within one month of your application process being completed.

If we make you an offer of employment, which you accept, on your start of employment with us we will ask you for information so that we can carry out some checks:

Our ability to offer you a permanent role following completion of the probation period is dependent on the successful completion of these checks. A failure to provide the information necessary to complete the checks will mean you will not be able to successfully complete your probation with us.

We are required by law to confirm the identity of our staff, their right to work in the United Kingdom. We also require referee information so we can seek assurance as to your trustworthiness, integrity and reliability.

Information provided by unsuccessful candidates at any point in the process up to which they are unsuccessful is retained for a period of 6 months from the end of the particular application process.

Information provided during an interview and assessment process, is kept by us for a period of 6 months from the end of the particular application process.

Equal opportunities and diversity information is retained for 12 months following the end of the particular application process.

## **New, Current and Former Employees**

For new employees, the following information will be required to be provided to us on the start of your employment:

1. Bank and National Insurance details – to process salary payments
2. Doctors and emergency contact details – so we know who to contact in case you have an emergency at work
3. You will be asked to bring in original documents that prove your identity. We will take copies.
4. You will be asked to bring in original documents that prove your qualifications. We will take copies.
5. If during the interview process you have indicated you hold a current driving license, you will be asked to bring in your driving licence and original MOT and insurance documents. We will take copies.
6. We may directly contact your referees, using the details you provide in your application.

If you join us as a new employee, the information that you have provided us with during the application process will form part of your employee personnel file.

Employee personnel files are held securely and centrally by our internal Group HR team.

The details of employees who successfully complete their probation will be provided to our occupational health scheme provider. Their use of information is governed by our contract with them. The information is provided to them is to enable you to be registered on the scheme, allow ourselves and the provider to operate the scheme to enable you to receive the relevant benefits.

We are by law obliged to work within the Workplace Pensions Auto-Enrolment Regulations as set by the UK's Pensions Regulator. The Company has selected a Pension Provider and details of the scheme are provided at the start of your employment. Your relevant details will be provided to the Pension Provider at the start of your employment. The information is provided to them is to enable you to be registered on the scheme, allow ourselves and the provider to operate the scheme to enable you to receive the relevant benefits.

Your employee personnel file will be retained by us for the duration of your employment with us plus 7 years following the end of your employment with us. Records of security checks, fitness for work and criminal records declarations are included within this and are retained for the same period of time.

To support our bidding and tendering for new work you will be asked to provide us with a CV detailing your project experience. This, along with any relevant qualification's certificates may be used, as appropriate to support our bid and tendering activities.

To comply with our legal obligations in relation to Accidents at Work, our health and safety team record and retain details of employee's accidents and where required submit these to the regulatory authorities such as the HSE.

Some of the roles may from time to time, depending on our client workload involve working with or in proximity to children and vulnerable people. If this is the case, you will be asked to complete an application for a Basic Criminal Records Bureau check via the Disclosure and Barring Service. They will verify your declaration of unspent convictions and that you are not barred from working with or in proximity to children and vulnerable people.

Some of the roles may from time to time, depending on our client workload, involve working with clients in the Rail transport industry. It in such circumstance we need to comply with the relevant client conditions and regulatory requirements. For example, Network Rail's Health & Safety Management System, TfL/LUL QUENSH manual and the requirements of the Transport and Works Act 1992. This may mean that employees working on transport sector projects may be asked to undertake a drugs and alcohol test. The testing is performed by a third-party data processor under a contract with us. They cannot do anything with your personal information unless we have instructed them. Results of tests are entered onto a secure third-party database run by Sentinel (owned by Network Rail) to register those individuals who are cleared to work on the relevant Transport Projects and issue then with individual Sentinel Cards.

### **Access to Information, Correction, Erasure, Restriction, Transmission and Objection**

We want to make sure that your personal information is accurate and up-to-date. In relation to the personal information that we hold about you, you have the right to:

- a) request a copy of the information;
- b) request the correcting of inaccurate and incomplete information;
- c) request the removal of the information;
- d) request the transmission of the information to yourself or an identified third party;
- e) request that we stop processing of that information.

We do not perform any automated individual decision making (making a decision solely by automated means without any human involvement) or automated profiling (automated processing of personal data to evaluate certain things about a person) of personal information.

If you would like a copy of some or all of the personal information, or to exercise any of the other above rights please email us on [gdprequiry@frankham.com](mailto:gdprequiry@frankham.com) or write to us at the following address:

Richard Sheehan, Group HR Manager, Frankham Consultancy Group, Irene House, Five Arches Business Estate, Maidstone Road, Sidcup, Kent, DA14 5AE

### **Other Websites**

Our Frankham.com website contains links to other websites. This privacy notice only applies to our website. When you link to other websites you should read their privacy notices.

### **Changes to our Privacy Notice**

Our Privacy Notice is kept under regular review. We will place revised versions on this website. This Privacy Notice was last updated during July 2019.

### **Contacting Us**

Please contact us if you have any questions about our Privacy Notice or information that we hold about you:

- a) by email to [gdprenquiry@frankham.com](mailto:gdprenquiry@frankham.com)
- b) or write to us at: Richard Sheehan, Group HR Manager, Frankham Consultancy Group, Irene House, Five Arches Business Estate, Maidstone Road, Sidcup, Kent, DA14 5AE