

For the duration of this document, all reference to Step Teachers also refers to Step Teachers Ltd trading as Class Act Teaching Services in Oxfordshire.

Step Teachers Ltd is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special categories of personal data) so that it can provide these services – in doing so, Step Teachers acts as a data controller.

You may give your personal details to Step Teachers 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. Step Teachers must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with this privacy statement. We will comply with current data protection laws at all times.

1. Collection and use of personal data

a. Purpose of processing and legal basis

Step Teachers will collect your personal data (which may include special categories of 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, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in we may also send you marketing information and news via email/text. You can opt-out from receiving these any time by clicking “unsubscribe” when you receive these communications from us.

On some occasions 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.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

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

b. Legitimate interest

This is where Step Teachers has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where Step Teachers has relied on a legitimate interest to process your personal data our legitimate interests are as follows:

- Managing our database and keeping work-seeker records up to date.
- Providing work-finding services to you and our clients.
- Contacting you to seek your consent where we need it.
- Giving you information about similar services that you have used from us recently.

c. Statutory/contractual requirement

Step Teachers has certain legal and contractual requirements to collect personal data e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements. Our clients may also require this personal data, and we need your data to enter into a contract with you. If you do not give us the personal data we need to collect, in order to comply with our statutory and legal requirements, we may not be able to continue to provide work-finding services to you.

d. Recipient/s of data

Step Teachers will process your personal data and/or sensitive personal data with the following recipients:

- Client schools, nurseries, and colleges whom we may introduce or supply you to.
- Former or prospective new employers that we obtain or provide references to.
- Payroll service providers who manage payroll on our behalf.
- Any public information sources and third-party organisations that we may use to carry out suitability checks on work-seekers (including but not limited to Disclosure and Barring Service (DBS), Teaching Regulation Agency, YOTI, Home Office (online right to work check)).
- Government, law enforcement agencies and other regulators (including but not limited to the Police, Home Office, HMRC, Pension providers, Local Authority Designated Officers (LADO)).
- Third parties who provide, host and/or support our IT systems and software (subject to appropriate security measures).
- Our pension provider; Smart Pensions.
- The Recruitment and Employment Confederation, Department for Education and Affinity Workforce who carry out audits to ensure our business is run correctly.
- Our insurers and legal advisers.
- Any other organisations you ask us to share your personal data with.

2. This section applies to candidates who have not supplied their personal data directly to Step Teachers

Step Teachers has collected some or all of the following personal data on you:

Categories of data:

Personal data:

- Name.
- Address.
- DOB.
- Mobile/home number.
- Email address.

- Employment history.

Step Teachers sourced your personal data from:

Source of the personal data:

- Job boards that we subscribe to including but not limited to C.V. Library, Guardian Jobs, Reed.
- LinkedIn .
- A former employee of Step Teachers that has refereed you to us.
- A former employer of yours that has referred you to us.
- Cookies listed in section 7

Some of the above information came from a publicly accessible source.

3. Overseas Transfers

Step Teachers may transfer the information you provide to us to countries outside of the UK for the purposes of providing you with work-finding services. We will take steps to ensure adequate protections are in place to ensure the security of your information.

4. Data retention

Step Teachers will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. For example, 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 are required to keep your records relating to right to work in the UK for 2 years after employment or the engagement has ended, alterable and working time records including your 48 hour opt out notice, annual leave/holiday records for 2 years from the time they were created.

Additionally, 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. This is currently 3 to 6 years.

For legitimate business interest, we will retain your personal data for six years after the date on which we last provide you with work-finding services to protect the business against any legal claims for breach of contract; to allow us to provide our candidates/client schools with a reference and confirmation as to their suitability to work with children (if requested); to contact the candidate for any further work finding services.

We will keep personal data obtained from job boards that we subscribe to for 18 months from the date it was obtained. The reason for this is that trends in education show that candidates are more than likely to change jobs within the year. We will therefore contact you within that period about job opportunities. If we have no meaningful contact with you after this period, your data will be deleted.

We will retain safeguarding information indefinitely. We retain this information in order to ensure that we are aware of any substantiated safeguarding issues relating to you in the event of any future applications you may submit to us.

5. Your rights

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

- The right to be informed about the personal data Step Teachers processes on you;
- The right of access to the personal data Step Teachers 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 Step Teachers processing your personal data and sensitive personal data, you have the right to withdraw that consent at any time by contacting the Data Protection Officer using the contact details below. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where Step Teachers will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that Step Teachers processes is incorrect or incomplete, please contact us using the details below and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the below details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

6. Automated decision-making

Step Teachers do not use automated decision-making in any of our recruitment decisions.

7. Cookies

We may obtain data about you from cookies. These are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more

efficiently, as well as to provide information to the owners of the site. Cookies also enable us to deliver more personalised content.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, visit <https://www.aboutcookies.org.uk/>. Please note that some of our website features may not function if you remove cookies from your browser.

8. Log Files

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information. If you apply to work with Step Teachers, via our website, we use Google Analytics to record the site that referred you to us; this is so we track the success of the various advertising services we use.

9. Links to external websites

Step Teachers website may contain links to other external websites. Please be aware that Step Teachers is not responsible for the privacy practices of such other sites. When you leave our site, we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by Step Teachers website.

10. Sales of business

If Step Teachers business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Where the sale of the business results in the transfer of your details to a different data controller we will notify you of this.

11. Data Security

Step Teachers takes every precaution to protect our users' information. Security measures include, but are not limited to, the use of firewalls and endpoint protection, browser certification technology, encryption, least privilege principle, malware protection and password managers.

Only employees who need the information to perform a specific job (for example, consultants, our accounts clerk or a marketing assistant) are granted access to your information.

Step Teachers uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason Step Teachers cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others, we recommend that you do not select the “remember my details” function when that option is offered.

If you have any questions about the security at our website, you can email webmaster@stepteachers.co.uk.

12. Changes to this privacy notice

We will update this privacy notice from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you. This current Privacy Notice was updated in October 2025.

13. Complaints or queries

If you wish to complain about this privacy notice or any of the procedures set out in it, please contact:

The Data Protection Officer by emailing GDPR@stepteachers.co.uk.

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