



## GDPR Employment Records

This Policy is adhered to by Central Education Group Ltd and all noted subsidiaries below:

- Activated Care Ltd
  - Educate Schools Ltd
  - Central Education Ltd
  - Bee Active Ltd
  - Dream Big Sports Ltd
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- It is not generally necessary to seek a worker's consent to keep employment records. It will usually be sufficient to ensure that the worker is aware that records are being kept and is given an explanation of the purposes they are kept for and the nature of any intended disclosures.
  - It is only if sensitive data are collected that consent may be necessary.
  - Decide on how best to inform new workers about how information about them will be held, used and disclosed.
  - If your organisation has not done so previously, distribute this information to existing workers.
  - In large organisations, randomly check with a sample of workers, that they did in fact receive this information. Rectify any communication gaps.
  - Ensure that information given to new workers includes information about their rights under the Act.
  - Set up a system to remind existing workers of their rights
  - Review all forms where information is requested from workers.
  - Remove or amend any questions which require the worker to provide information extraneous to your needs.
  - Review who in your organisation has access to employment records and determine whether it is necessary for everyone who currently has access to retain it.
  - Remove access rights from those who have unnecessary or over-extensive access to personal information about others.
  - Make sure manual files that hold personal information are securely held with locks and only those who should have access retain the key.
  - In the case of computerised records, ensure that passwords or similar controls are set up to limit unauthorised access.
  - Carry out background checks on staff that will have access to workers' records, for example by taking up references.
  - Review the contracts of workers who deal with personal information to ensure they include confidentiality clauses concerning the unauthorised disclosure and use of personal information.
  - Set up induction training for these staff that contains explanation about their responsibilities. Organise refresher training as and when necessary.
  - Formulate a procedure for taking laptop computers off-site (or review the existing procedure). Include points regarding the information that may be taken off-site, security of passwords and keeping the laptop in view or secured at all times.



- Inform all workers, including senior staff, of the procedure.
- Where possible keep sickness and injury records separate from absence and accident records. Do not use sickness records for a particular purpose when records of absence could be used instead.
- Review how sickness and accident records are currently kept.
- If necessary, change the way information on sickness and accidents is kept so that information on workers' health is not accessed when only information on absence or the circumstances of an accident at work is needed.
- Inform those accessing both sickness/injury and absence records of when it is and is not necessary to access the full sickness or injury records.
- Managers can be provided with information about those who work for them in so far as this is necessary for them to carry out their managerial roles.
- No 'league tables' of individual records should be published.
- Ensure that managers are aware of the sensitive nature of sickness and injury records.
- Have a checklist in place listing all places where personal information might be held that should be checked.
- Use the checklist to gather all personal information in time to enable a response within 40 days.
- Set out a clear company policy stating who can give corporate references, in what circumstances, and the policy that applies to the granting of access to them. Make anyone who is likely to become a referee aware of this policy.
- Determine who is allowed to give corporate references, this may, for example, be done by grade. Check whether your organisation distinguishes between corporate and personal references. If not, consider doing so.
- Draw up a policy explaining how reference requests should be handled, outlining the types of information that can be provided and the extent to which workers are given access. Ensure the policy is brought to the attention of anyone who is likely to receive a reference request.
- As part of the policy, include a requirement that all those giving corporate references must be satisfied that the worker wishes the reference to be provided.
- As part of an Exit Policy, include on file a record of whether the worker wishes references to be provided after he/she has left.
- give workers a clear notification that video or audio monitoring is being carried out and where and why it is being carried out.
- Ensure that there are adequate notices, or other means, to inform such people about the monitoring and its purpose(s)

This policy was reviewed by our Operations Director last on 05/01/2026.

The policy will next be reviewed on 01/09/2026.

**Name:** Jake Davies

**Signed:** 