SCREENING PRIVACY NOTICE

1. About this notice

H&T Experts Ltd (“H&T”, “we”, “us”) uses personal information to assess suitability for security-related roles and assignments, including screening undertaken in accordance with BS 7858:2019 where applicable. This notice explains how we collect, use, verify, disclose, protect and retain screening information. It applies to people applying to work for H&T, those conditionally employed while screening continues and individuals whose screening H&T conducts directly. Our Supplier Personnel Privacy Notice (QMS-66) separately addresses information received about personnel provided by third-party suppliers.

2. Who controls your information and how to contact us

H&T Experts Ltd is normally the data controller for screening it determines and conducts. Where another organisation determines the screening purposes or acts jointly with us, the respective roles will be assessed and explained where relevant.

H&T Experts Ltd, 27 Old Gloucester Street, London, England, WC1N 3AX. Email: compliance@htexperts.uk. Telephone: +44 7490 876368. Please mark privacy requests for the attention of the Compliance Manager.

3. Information we collect

Identity and contact details: name, previous names, date of birth, addresses and address history, contact details, photograph and identity documents.

Eligibility and licensing: right-to-work evidence, immigration permission where relevant, SIA licence status, licence number and expiry, role-related qualifications and certifications.

Career and activity history: employment, self-employment, education, unemployment, overseas residence, career gaps, referee details and documentary evidence supporting relevant periods.

Verification results: references, confirmation of dates and activities, authenticity checks, correspondence with referees and discrepancies requiring clarification.

Suitability checks: relevant public-record and financial information, sanctions or watchlist screening, directorship or insolvency information and role-appropriate criminal-record or other legally permitted checks.

Screening decisions: risk assessments, explanations, correspondence, interview notes, conditional-employment approvals, screening status, review and sign-off records.

We only seek information necessary and proportionate to the role and screening purpose. We do not routinely request unrestricted medical histories, unrelated personal details or social-media access.

4. Where information comes from

Information may come directly from you, your identity and eligibility documents, current and former employers, education providers, referees, official licensing and government services,

authorised criminal-record checking bodies, public records, appropriately selected screening providers and other sources reasonably necessary to verify your declared history. We may contact referees or organisations you identify, and may use independently obtained contact details to authenticate a reference.

If you request that we defer contacting your current employer, we will consider that request and explain any alternative evidence needed and when contact may become necessary. Deferral cannot guarantee that screening can be completed without verification.

5. Why we use information and our lawful bases

Different activities may rely on different lawful bases under Article 6 UK GDPR. We assess and record the appropriate basis for each activity rather than treating BS 7858 itself as a law requiring all checks.

Steps before entering a contract / performance of a contract (Article 6(1)(b)): handling applications and relevant employment or engagement arrangements where this basis applies.

Legal obligation (Article 6(1)(c)): carrying out checks or retaining records required by applicable law, including employer right-to-work obligations where applicable.

Legitimate interests (Article 6(1)(f)): verifying identity and history, protecting people, property and clients, preventing fraud, managing security risk, and demonstrating contractual or industry-standard screening; we balance these interests against your rights.

Legal claims (where applicable): information may be retained or used to establish, exercise or defend legal claims under the appropriate lawful basis and any applicable additional condition.

We do not generally rely on GDPR consent as the lawful basis for employment screening. Where your authorisation is requested to approach a referee or obtain a particular check, that authorisation does not necessarily constitute GDPR consent or replace the lawful basis required for processing.

6. Criminal offence data and special category information

Criminal offence data receives additional protection under Article 10 UK GDPR and the Data Protection Act 2018. We will only obtain and use such information where permitted by law, with an identified Article 6 basis and a relevant Schedule 1 DPA 2018 condition or other lawful authority. Where required, H&T will maintain an appropriate policy document (HTE-DP-005), safeguards and retention controls. We will use the appropriate lawful disclosure route and will not request information that we are not entitled to receive. Spent-conviction rules and the Rehabilitation of Offenders Act 1974 and its exceptions will be considered as applicable.

We do not routinely seek special category data for screening. If information such as health or disability data becomes relevant, we will identify a separate Article 9 condition and any required DPA 2018 condition, minimise collection and restrict access. Requests for reasonable adjustments will be handled separately where practical.

7. How screening decisions are made

Screening may involve preliminary checks, limited screening, full screening and documented risk assessment, as appropriate to the role. In some cases H&T may permit conditional employment only after the required preliminary and limited checks and an authorised risk assessment. A recruitment offer does not by itself authorise commencement of work. If verification is incomplete, contradictory or raises concerns, we may request clarification, assess the relevance of the issue, delay a start date, restrict duties or decide not to proceed. We aim to consider context fairly rather than automatically reject applicants because of an adverse record.

Screening decisions are subject to human review. H&T does not currently use solely automated decisions that produce legal or similarly significant effects in this screening process. If that changes, we will provide the additional information required by law.

8. Who we share information with

We may share only necessary information with authorised H&T screening and management personnel; reference providers; identity, right-to-work, licensing, criminal-record or financial-check providers where lawful; IT and document-storage service providers acting under appropriate agreements; clients where a proportionate confirmation of screening status or suitability is required; and regulators, law enforcement, legal advisers or other bodies where permitted or required by law. We do not ordinarily provide clients with a complete screening file where a status confirmation is sufficient.

9. International access and transfers

Some history checks may involve overseas employers, education providers or records. If personal information is transferred outside the UK in a manner restricted by UK data protection law, we will assess the transfer and use an applicable adequacy regulation, appropriate safeguards or another permitted mechanism, as required. You may request information about relevant safeguards.

10. Retention and secure disposal

We keep screening information only as long as necessary for the purpose, taking account of applicable legal requirements, BS 7858 recordkeeping recommendations, contractual obligations, possible disputes and H&T’s Data Retention & Disposal Schedule. Retention depends on whether you are appointed, whether screening is completed and the type of record. H&T will document the applicable retention period for each category, including any period after employment ends; records subject to a lawful hold may be kept longer. We securely delete, destroy or anonymise records when no longer required.

We do not retain original identity documents unless necessary; where a copy is required, access and retention are restricted. Criminal-record certificates and related information are subject to additional handling and retention safeguards.

11. Security and confidentiality

Screening records are treated as confidential. We use proportionate organisational and technical controls, including access limited to authorised personnel, secure storage and transfer, verification of recipients, confidentiality obligations and incident-response arrangements. We investigate suspected personal-data breaches and make notifications to the ICO or affected people where the law requires.

12. Your rights

Subject to legal conditions and exemptions, you may request access, rectification, erasure, restriction, portability (where applicable) or object to processing based on legitimate interests. Where processing genuinely relies on consent, you may withdraw it. You may also challenge qualifying solely automated decisions, if any are introduced. To exercise your rights, contact compliance@htexperts.uk. We may need to verify your identity before responding. You can complain to the Information Commissioner’s Office at ico.org.uk, although we welcome the opportunity to address concerns first.

13. Providing information and accuracy

Some information is required to assess suitability, verify eligibility or meet legal obligations. If relevant evidence is not provided, H&T may be unable to complete screening, confirm eligibility or proceed with an appointment or assignment. We will explain requests and consider reasonable alternatives where permitted. Please provide accurate information and tell us promptly about relevant changes or errors. Material discrepancies will be considered fairly and may require further verification.

14. Updates to this notice

We may revise this notice when our screening practices, service providers or applicable legal requirements change. Material changes will be communicated to affected individuals as appropriate. The current version should be provided at the start of the screening process and made accessible throughout.