

GLOBAL TALENT HIRE — FULL POLICY SUITE (OFFICIAL DOCUMENT SET)

1. GDPR & DATA PROTECTION POLICY

Purpose

Global Talent Hire is committed to protecting the privacy and security of personal data belonging to students, candidates, employees, partners, and clients. This policy outlines how we collect, store, process, and protect personal information in compliance with the UK GDPR and Data Protection Act 2018.

Scope

Applies to:

- All staff, contractors, and partners
- All data collected through website, CRM, email, applications, and recruitment processes

Data We Collect

- Personal identification (name, DOB, nationality)
- Contact details
- Academic/employment history
- Passport/visa information
- Application documents
- Employer details
- Communication records

Lawful Basis for Processing

- Consent
- Contractual necessity

- Legal obligation
- Legitimate interest

Data Storage & Security

- Encrypted digital storage
- Restricted access
- Secure CRM
- Password-protected systems
- Regular audits

Data Sharing

We may share data with:

- Universities
- Employers
- Partner agencies
- Compliance bodies
- UKVI (where required)

We never sell personal data.

Data Retention

- Student/candidate data: 6 years
- Employer contracts: 7 years
- Financial records: 6 years

Rights of Individuals

- Access
- Correction
- Deletion
- Restriction
- Data portability
- Objection

Data Breach Procedure

- Immediate internal reporting
- Investigation within 24 hours
- Notification to ICO where required

2. SAFEGUARDING POLICY

Purpose

To ensure the safety and wellbeing of students and candidates, especially minors and vulnerable adults, during recruitment, counselling, and placement activities.

Commitments

- Protect all individuals from harm, exploitation, or abuse
- Provide safe counselling and recruitment environments
- Train staff on safeguarding responsibilities
- Report concerns promptly

Types of Harm Covered

- Physical
- Emotional
- Sexual
- Financial
- Neglect
- Exploitation (including visa fraud, trafficking, coercion)

Staff Responsibilities

- Verify identity of students/candidates
- Maintain professional boundaries
- Report concerns to the Safeguarding Lead
- Keep accurate records

Reporting Procedure

1. Identify concern
2. Report to Safeguarding Lead
3. Document incident
4. Refer to authorities if required

Safeguarding Lead

- Name: **Md (Director)**
- Email: info@globaltalenthire.co.uk

3. ANTI-FRAUD & ANTI-BRIBERY POLICY

Purpose

To prevent fraud, bribery, corruption, and unethical behaviour in all recruitment and education activities.

Prohibited Activities

- Accepting or offering bribes
- Charging illegal fees
- Misrepresentation of universities or employers
- Document falsification
- Visa fraud
- Ghost applications
- Unauthorised commissions

Staff Responsibilities

- Maintain transparency
- Declare conflicts of interest
- Report suspicious activity
- Follow ethical recruitment standards

Reporting Fraud

- Confidential reporting channel: compliance@globaltalenthire.co.uk
- Zero retaliation policy

4. MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Purpose

Global Talent Hire is committed to preventing modern slavery, forced labour, and human trafficking in all recruitment operations, supply chains, and partnerships.

Our Commitments

- Zero tolerance for exploitation
- Ethical recruitment practices
- No worker-paid recruitment fees
- Transparent contracts
- Monitoring of overseas partners
- Compliance with Modern Slavery Act 2015

Risk Management

- Due diligence checks
- Partner audits
- Worker interviews
- Transparent fee structures

Reporting

Any concerns must be reported immediately to the Compliance Lead.

5. EQUALITY, DIVERSITY & INCLUSION POLICY

Purpose

To ensure fair, inclusive, and non-discriminatory recruitment and counselling services.

Protected Characteristics

- Age
- Disability
- Gender
- Race
- Religion
- Sexual orientation
- Pregnancy
- Marital status
- Gender reassignment

Commitments

- Equal access to opportunities
- Fair recruitment processes
- Inclusive communication
- Reasonable adjustments for disabilities
- Zero discrimination

6. COMPLAINTS POLICY

Purpose

To provide a fair, transparent process for handling complaints from students, candidates, employers, and partners.

How to Make a Complaint

- Email: complaints@globaltalenthire.co.uk
- Provide details, evidence, and desired resolution

Process

1. Acknowledge within 48 hours
2. Investigate within 7 working days
3. Provide written outcome
4. Offer escalation to Director if unresolved

7. ETHICAL RECRUITMENT POLICY

Purpose

To ensure all recruitment activities follow ethical, transparent, and fair practices.

Principles

- No worker-paid recruitment fees
- Transparent job descriptions
- Honest representation of roles
- No misleading promises
- Respect for candidate rights
- Compliance with international labour standards

For Student Recruitment

- Honest course guidance
- No false promises about visas or jobs
- Transparent commission structure
- Accurate information about universities

8. HEALTHCARE RECRUITMENT COMPLIANCE POLICY

(Required for NHS, care homes, and master vendors)

Includes

- DBS checks
- Right-to-work verification
- Clinical references
- Immunisation records
- Training compliance (e.g., CSTF)
- Professional registration checks (NMC, HCPC)

Commitments

- Safe staffing
- Full compliance with NHS standards
- Transparent documentation
- Ethical international recruitment

9. DATA SECURITY & IT POLICY

Purpose

To protect digital systems, CRM, and confidential information.

Controls

- Password protection
- Two-factor authentication
- Encrypted storage
- Regular backups
- Restricted access
- Cyber Essentials alignment

10. AGENT CODE OF CONDUCT (FOR UNIVERSITY PARTNERSHIPS)

Commitments

- Provide accurate information
- Follow university guidelines
- Maintain confidentiality
- Avoid misrepresentation
- Support students ethically
- Attend training sessions
- Maintain compliance records