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Right to Rectification Policy

Purpose

This policy explains how Pure Resourcing Solutions Limited handles requests for rectification under the UK GDPR and the Data Protection Act 2018.

The right to rectification allows individuals to have inaccurate personal data corrected and incomplete personal data completed where appropriate.

This policy explains how the organisation receives, assesses, records and responds to rectification requests within the statutory time limits.

Scope

This policy applies to all employees, workers, contractors and other personnel who receive or handle requests for rectification.

It applies to personal data held in electronic systems, paper files, emails, recruitment systems, shared drives and other relevant records.

It covers personal data relating to candidates, employees, clients, suppliers and other contacts where the organisation acts as a data controller.

What Rectification Means

Individuals have the right to have inaccurate personal data corrected.

They may also have incomplete personal data completed, including by providing a supplementary statement where appropriate.

This right supports the UK GDPR accuracy principle but is a separate right that must be considered whenever a request is received.

Requesting Rectification

A rectification request may be made verbally or in writing and does not need to use any particular wording.

Requests may be made to any employee or department.

Employees receiving a request must:

- record the request;
- forward it to the Data Protection Lead within one working day; and
- avoid making changes until the request has been assessed.



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Assessment of Requests

The organisation will take reasonable steps to determine whether the personal data is accurate.

In doing so, it will consider:

- evidence provided by the individual;
- information already held;
- the purpose for which the data is processed;
- any previous verification of the data.

Each request will be assessed individually.

Recruitment Records

Examples of rectification requests within the recruitment business may include:

- incorrect contact details;
- inaccurate employment history;
- incorrect qualifications or professional memberships;
- duplicate candidate records;
- factual inaccuracies within interview records;
- incorrect compliance documentation;
- inaccurate client or supplier contact information.

Each request will be considered on its own facts.

Opinions and Professional Judgements

A genuine professional opinion does not become inaccurate simply because an individual disagrees with it.

Where an opinion accurately reflects the view genuinely held at the time, rectification may not be appropriate.

Where appropriate, the organisation may record the individual's contrary view or note of dispute alongside the existing record.

Historical Records

Where disputed information relates to an event that occurred in the past, historical records that accurately reflect what happened at the time should not normally be altered simply because circumstances have changed.

Where an error is identified, the organisation should ensure the record clearly reflects both the original entry and the corrected position so that an accurate historical record is maintained.

Restriction of Processing Pending Verification

Where an individual contests the accuracy of personal data, the organisation will consider whether processing should be restricted while the accuracy is verified.



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Where restriction is applied, the personal data will not be processed further except where permitted under UK GDPR.

Where No Rectification Is Required

If the organisation concludes that the personal data is already accurate, it will explain its decision to the individual.

The response will include:

- reasons why no amendment has been made;
- the individual's right to complain to the Information Commissioner's Office (ICO);
- the individual's right to seek a judicial remedy.

The organisation should also record internally that the accuracy of the information has been challenged.

Notification of Rectification

Where personal data has previously been disclosed to another organisation, the organisation will notify those recipients of any rectification unless this proves impossible or involves disproportionate effort. If requested, the organisation will also inform the individual of those recipients.

Time Limits

The organisation will respond without undue delay and within one month of receiving the request.

Where identity verification is reasonably required, the one-month response period begins once sufficient information has been received to verify the individual's identity.

Where requests are particularly complex or numerous, the response period may be extended by up to two further months.

Where an extension applies, the individual will be informed within the initial one-month period together with the reasons for the delay.

Identity Verification

Where the organisation has reasonable doubts about the requester's identity, it may request additional information to verify identity.

Only information that is necessary and proportionate will be requested.

Identity verification should only be requested where genuinely required.

Refusing Requests

The organisation may refuse a request where it is manifestly unfounded or manifestly excessive, including where requests are repetitive.



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Where appropriate, the organisation may either:

- refuse the request; or
- charge a reasonable administrative fee.

Any refusal must be fully documented and approved by the Data Protection Lead.

Refusal Notices

Where the organisation refuses a request, it will notify the individual without undue delay and within one month.

The response will explain:

- the reasons for refusal;
- any applicable exemptions;
- the right to complain to the Information Commissioner's Office;
- the right to seek a judicial remedy.

The same information will be provided where a fee is charged or additional identity information is required before the request can proceed.

Record Keeping

All rectification requests must be logged centrally.

The record should include:

- date received;
- requester details;
- nature of the request;
- evidence considered;
- identity verification undertaken;
- systems updated;
- any restriction applied;
- recipients notified;
- decision reached;
- reasons supporting the decision;
- response date.

A clear audit trail should be maintained demonstrating compliance with UK GDPR.

Responsibilities

Data Protection Lead

Responsible for:

- managing rectification requests;
- assessing evidence;
- ensuring statutory deadlines are met;
- approving refusals;
- maintaining records.



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IT Function

Responsible for:

- updating electronic systems where instructed;
- maintaining audit logs where appropriate;
- ensuring corrections are reflected across relevant systems where technically possible.

Managers

Managers must ensure staff cooperate promptly with rectification investigations and provide relevant information when requested.

Employees

Employees must recognise rectification requests, forward them immediately to the Data Protection Lead and cooperate with investigations.

Related Policies

This policy should be read alongside:

- Privacy Notice
- Subject Access Request Policy
- Right to Erasure Policy
- Data Retention Policy
- Data Breach Response Procedure

Contact Details

Requests for rectification should be sent to:

Email: privacy@prsg.co.uk

Telephone: 01223 209888

Post: Pure Resourcing Solutions, The Workspace, Pioneer Court, Vision Park, Histon, Cambridge, CB24 9PT

Policy Ownership

Responsible: Quality, Compliance & Systems Team Leader

Accountable: Operations Director

Informed: All employees, candidates and contacts

Complaints

If an individual is dissatisfied with the handling of their request, they may use the organisation's internal complaints procedure.

They also have the right to complain to the Information Commissioner's Office (ICO) or another relevant supervisory authority and, where appropriate, seek a judicial remedy.

Any refusal notice should clearly explain these rights.



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Policy Review

This policy will be reviewed annually, or sooner where changes to legislation, ICO guidance or organisational processing activities make this necessary.