

Job applicant privacy notice

As part of the recruitment process we collect and process personal data relating to job applicants. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

Types of information we collect

We collect a range of information about you. This includes:

- your personal details including your name, address, date of birth, email address, phone numbers
- your photograph
- gender
- marital status
- dependants, next of kin and their contact numbers
- medical or health information including whether you have a disability
- information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin
- information included on your CV including references, education history and employment history
- information about your entitlement to your right to work in the UK
- driving licence
- bank details & tax codes
- national Insurance number
- current and previous job titles, job descriptions, pay grades, pension entitlement, hours of work and other terms and conditions relating to your employment/engagement with us
- details of your criminal record

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers, referees, and information from criminal records checks. The company will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so. Data will be stored in a range of different places, including on your job application form, in HR management systems and on other IT systems (including email).

Why does the company process personal data

We need to process data at your request, prior to entering a contract with you. It also needs to process your data to enter a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

There is a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

We process health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, we will keep your personal data on file in case there are future employment opportunities for which you may be suited. You will be asked for your consent before we keep your data for this purpose, and you are free to withdraw your consent at any time.

How does the company process special categories of personal data

The company processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability, for example whether adjustments need to be made during a test or interview. This is to carry out its obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, religion or belief, marital status, gender re-assignment and age status this is for equal opportunities monitoring purposes.

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data in the following ways:

We rely on the lawful basis of legitimate interests for security clearance and to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role to process this data.

Who has access to the data

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Special categories of data that we use for equality purposes is collected with the express consent of candidates, which can be withdrawn at any time. Applicants are entirely free to decide whether to provide such data and there are no consequences of failing to do so. This data is kept in a secure online location with limited access only by specific HR individuals. Equality data cannot be seen by line management or any other employees.

We will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers/ referees to obtain references for you, and the Disclosure and Barring Service to obtain necessary criminal records checks.

We will not transfer your data outside the European Economic Area.

How does the company protect data

The security of your data is taken very seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. We use technical and organisational measures to safeguard your personal data, these include;

- ensuring that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them
- ensuring that all files or written information of a confidential nature are not left where they can be read by unauthorised people
- refraining from sending emails containing sensitive work-related information to their personal email address
- checking regularly on the accuracy of data being entered into computers
- always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them
- using computer screen blanking to ensure that personal data is not left on screen when not in use.

How long does the company keep the data

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request
- Require us to change incorrect or incomplete data
- Require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing
- Object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the company's legitimate grounds for processing data
- You can make a subject access request by completing the company's form for making a subject access request.

If you believe that the company has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data

You are under no statutory or contractual obligation to provide personal data to the company during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision making

Recruitment processes are not based solely on automated decision-making.