

Candidate Privacy Notice

What is the purpose of this document?

Salvation Army Housing Association (**SAHA**) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. As a candidate this privacy notice is applicable to you because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and,
- kept securely.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, salary, qualifications, education history/
- Any information you provide to us during an interview.
- Work based test, psychometric test results or referees.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records and disabilities
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate - such as information you provide to us through our recruitment portal Easyweb
- Recruitment agencies we may appoint from time to time. From which we collect the following categories of data: Name, address, date of birth, work history, information contained within the C.V provided, covering letters, application forms, references already undertaken. Right to work information and where appropriate DBS information.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect the following categories of data: employment history, attendance, punctuality, quality of work, dates of employment,

How we will use information about you

We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks, where applicable;
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and,
- comply with legal or regulatory requirements.

A subsidiary of The Salvation Army

Registered office: 3rd Floor, St. Olaves House, 10 Lloyd's Avenue, London EC3N 3AJ

Registered with the Financial Conduct Authority (FCA) as a Community Benefit Society with charitable status No. 15210R.

Registered with the Regulator of Social Housing No LH 2429. VAT Reg No 191 0855 05



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It is in our legitimate interests to decide whether to appoint you to role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into:

- a contract with you - for prospective relief staff work
- a contract of employment with you - for prospective employees.

Having received your C.V, covering letter and / or your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references, conduct a pre-employment check and a right to work check and if applicable to the role applied for, carry out a criminal record check before confirming your appointment.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview and for meaningful equal opportunity monitoring and reporting.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We envisage that we will process information about criminal convictions for any role where this is deemed appropriate and applicable to do so. The level of DBS check required will be in line with current statutory requirements and guidance in relation to the duties the role undertakes and will be stated in the role information provided at application.

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We will only collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). Where appropriate we are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- Where we are legally required by a Regulatory Body to carry out criminal record checks for those carrying out particular roles.
- Where a role is one which is listed on the Rehabilitation of offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233) so is eligible for a Standard or Enhanced check from the Disclosure and Barring service.
- The role requires a high degree of trust and integrity so we would like to ask you to seek a basic disclosure of your criminal records history.

Should the above apply to the role you have applied for, you will be made aware before any checks are sought and your full consent is obtained in order to process.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We operate automated decision making via the Easyweb recruitment portal in order to sift through applications to ensure those applicants with the required skill level are considered for shortlisting. We consider this to be necessary particularly where a large number of applications are received as it would not be practical to go through each one manually. The consequence of this process is that you may not be short-listed for interview if you do not pass the automated sifting process.

We have safeguards in place to protect your rights in relation to automated decision making. We regularly review the process to ensure the sifting is fair and non-discriminatory. Where we have made a decision about you on an automated basis that means you do not progress through the recruitment process, we will let you know. If you wish to have the decision manually reviewed or to contest the decision, please contact the HR department on HR@saha.org.uk within 21 days of being informed of the outcome.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with the following third parties for the purposes of processing your application:

- People point HR who are our retained third party HR administrators
- Easyweb recruitment who operate the recruitment portal.

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Should an offer of employment (conditional in the first instance subject to required checks) follow, then our retained third parties are:

- Occupational health and health screening partners – Healthscope,
- DBS check administration and processing – DDC.
- Pension partner companies
- Solo protect – If lone working devices are required for your role.
- Charity Learning Consortium – Our Learning and development on line portal providers.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Head of HR and OD.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

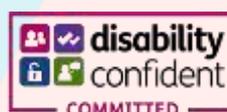
If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

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Your rights of access, correction, erasure, and restriction in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing at Saha Head Office, St Olaves House, 10 Lloyds Avenue, London EC3N 3AJ or e mail: DPO@saha.org.uk.

Right to withdraw consent

When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Data Protection Officer at the above address. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

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Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO via email at dpo@saha.org.uk or in writing at the address noted above. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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