

Recruitment 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. You are being sent a copy of this privacy notice 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 UK General Data Protection Regulation.

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 any covering letter.
- The information you have provided to saha in our application form and / or when registering in our Talent Pool, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications, details of your availability for work and information about remuneration.
- Any information you provide to us related to the assessment process, including during interview in person or on line or any work based test, psychometric test, or for any other legitimate aspect of the assessment process

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

- Information about your nationality, race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your marital status, next of kin, dependants and emergency contacts

- information provided by you or others in relation to pre employment checking, including :-
 - your right to work in the UK,
 - information about your health including any medical condition, health and sickness records and any disabilities
 - information including allegations of criminal offences, or about any criminal record including past and current convictions, barred lists and / or other information revealed by appropriate checking undertaken by the Disclosure and Barring Service ('DBS') on our behalf.
 - Driving licence information (where having a driving licence is a requirement of the role).

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the applicant – such information you provide to saha through our recruitment portal , talent pool and applicant tracking systems
- Recruitment agencies we may appoint from time to time. From from which we collect the following categories of data: name, address, date of birth, work history, information contained within the CV provided, covering letters, application forms, references already undertaken, right to work information, and where appropriate, DBS information.
- Disclosure and Barring Service information as released by the DBS and / or provided by you in relation to criminal convictions, barred lists and / or other appropriate information.
- Your named referees, from whom we collect the following categories of data: Employment history including type of work undertaken, attendance, punctuality, quality of work, dates of employment and salary information.

How we will use information about you

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

- assess your suitability for the job, including skills, qualifications and experience
- assess your suitability for future jobs according to parameters you set on our Talent Pool if you decide to register
- 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.

Data will be stored in a range of different places, including on your application record within the recruitment portal and/or Talent Pool system, in HR management systems and on other IT systems (including email).

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 worker roles
- a contract of employment with you for prospective employees
- a contract for services if you are otherwise contracted via the recruitment portal

Having received your CV, covering letter and / or you application form we will then process that information to decide whether or not you should be shortlisted for the role. If we decide to call you for assessment and / or interview we will also use the information you provide to us at assessment / interview to decide whether or not to offer the role to you.

If we decide to offer the job to you then subject to your acceptance of the offer, we will then conduct pre-employment checks including for example the take up of references, a right to work in the UK check and as applicable to the role being applied for, arrange for a check with the Disclosure and Barring Service (DBS) in relation to convictions, barred lists or other relevant information that is disclosed. We may outsource the administration of the DBS checking process to a third party organisation.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (or confirm an offer of employment, such as evidence of right to work or work history), we will not be able to progress your application further. For example, if we require references for a 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 assessment / interview and for meaningful anonymised equal opportunity monitoring and reporting
- We may also use information provided by you and / or saha's occupational health provider about your disability status or health to consider whether you are fit to undertake the role you have applied for and / or if we should consider appropriate reasonable adjustments to your workplace on a temporary or permanent basis
- 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 anonymised equal opportunity monitoring and reporting. However, 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.

Information about criminal convictions

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

- If we are legally required by a Regulatory Body to carry out criminal record checks for those carrying out particular jobs.
- The job 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 related to current convictions only.

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 our recruitment portal and recruitment applicant tracking system to ensure that those applicants with appropriate qualifications 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 and or where a qualification (such as driving licence or the right to work in the UK) is essential for the role. The consequence of this process is that you might not be considered for shortlisting 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 our People Services Team, Peopleservices@saha.org.uk within 21 days of being informed of the outcome.

Data sharing

Why might you share my personal information with third parties?

Should you be offered a job, we will share information with the named referees you have provided for the purposes outlined in the sections above.

We will also share your personal information with the following third party providers for the purposes of processing your application:

- Recruitment Applicant Tracking System provider who operates the recruitment portal and talent pool

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

- Occupational health and health screening
- DBS check administration and processing
- Pension provision and administration
- Lone working protection

These third party providers will change from time to time in accordance with our delivery needs and procurement regulations. If you would like further information regarding a specific provider, please contact Peopleservices@saha.org.uk

All our third-party service providers 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 People Services via peopleservices@saha.org.uk

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.

We will not transfer your data outside the UK.

Data retention

How long will you use my information for?

Talent Pool Registration – Our Recruitment Portal provides you with the opportunity to request automatic job alerts according to criteria you set. It also provides for a hiring manager and key People Services employees to access your stored details to determine possible suitability for vacant position in future. Your registration information will be stored and you may store an application form also. This will continue for a maximum period of 12 months from your date of registration. You may alter your consent, cease registration or extend registration for a further period of up to 12 months at any time by accessing your portal area using your own password protected access.

Job Application - We will retain your personal information for the remainder of the duration of your Talent Pool Registration (maximum 12 months). We retain your personal information and information obtained to assist with decision making related to your application 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:

- the personal information submitted by you in your application will be anonymised, the remaining information will not be attributable to you and will continue to be used for statistical purposes only
- we will securely destroy all other information obtained in relation to the assessment (eg assessment and interview notes, pre-employment check information (if this has been taken up) etc, whether held on the recruitment system or on paper in accordance with our data retention policy.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment. A separate privacy notice exists for data belonging to current and former employees **Rights of access, correction, erasure, and restriction**

Your rights 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; or object to the processing of your personal data you may do so at any time by accessing your personal settings in the recruitment portal. If you have any concern regarding the above or if you want to request that we transfer a copy of your personal information to another party, please contact The Data Protection Officer (DPO) 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 registered on our recruitment portal and 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. You may withdraw your consent at any time by accessing your personal settings in the recruitment portal. If you have any concerns regarding withdrawing 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 remove and / or anonymise your personal data securely.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this recruitment privacy notice. If you have any questions about this recruitment privacy notice or how we handle your personal information, please contact the DPO via e.mail at dpo@saha.org.uk

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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