Recruitment Privacy Notice

13th July 2022

for you – for your community – not for profit

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1. Introduction

Data controller: Two Rivers Housing Group

Data protection officer: James Osborne, DPO@2rh.org.uk

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

2. What information does the organisation collect?

The organisation collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The organisation collects 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 including online tests.

The organisation will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks. The organisation 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. Two Rivers Housing inly works with organisations which state that they comply with UK data protection legislation, EU GDPR or equivalent privacy standards

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email) and managed in line with GDPR and the Data Protection Act 2018.

3. Why does the organisation process personal data?

The organisation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the organisation needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

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

The organisation processes 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 the organisation processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, the organisation is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

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

4. Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the People team, interviewers involved in the recruitment process and managers in the business area with a vacancy.

The organisation may share your data with third parties for the purpose of recruitment (ie: consultancy services). If your application for employment is successful and it makes you an offer of employment. The organisation will then share your data with former employers to obtain references for you and the Disclosure and Barring Service to obtain necessary criminal records checks if the role requires it.

The organisation will not transfer your data outside the European Economic Area.

5. How does the organisation protect data?

The organisation takes the security of your data seriously. It has 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.

6. For how long does the organisation keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for twelve months after the end of the relevant recruitment process. At the end of that period 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 electronic personnel file. The periods for which your data will be held will be provided to you in a Staff Privacy Notice.

7. 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 the organisation to change incorrect or incomplete data;
- require the organisation 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 organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

[If you would like to exercise any of these rights, please contact the Data Protections Officer: DPO@2rh.org.uk

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

8. What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation 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.

9. Automated decision-making

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

10. Changes to the Recruitment Privacy Notice

Our Recruitment Privacy Notice is regularly kept up to date and this version was updated on 13th July 2022. The latest full version is always available from our intranet. We will review the Notice every three years or as and when required.