



## **PRIVACY NOTICE FOR RECRUITMENT CANDIDATES**

HCCG CIC is committed to protecting the privacy and security of candidates' personal data. This privacy notice describes how we collect and use personal data about you during and after the recruitment process in accordance with the General Data Protection Regulation (GDPR).

Our approach to your personal data is that we will do our best to ensure that we:

1. comply with relevant data protection legislation and all other applicable laws;
2. be open and transparent about how we use your personal data;
3. only collect personal data that may be required as part of the recruitment process;
4. make sure you can access and exercise your other rights under relevant data protection legislation;
5. protect your personal data and keep it secure; and
6. ensure our administrative and management team is trained on the importance of privacy and making them aware of the correct processes to follow in relation to privacy and the handling of personal data.

This notice applies to candidates that apply for advertised clinical placements/counsellor vacancies or other job vacancies with Horsham and Crawley Counselling Group CIC ('HCCG').

### **What's the purpose of this notice?**

HCCG CIC is a "data controller" in respect of any personal data it collects and holds about you as part of the recruitment process. As a data controller, we are responsible for deciding:

(i) what data we collect (ii) how we use it; (iii) how we store it; and (iv) when we delete it. Under the GDPR, we are required to notify you of (i) to (iv).

### **What sort of personal information might we collect and hold about you**

Personal data means any information about a person from which they might be identified. Personal data does not include anonymous data. The categories of personal data we may collect and hold about you may include:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Application forms or cover letters or any other supplementary document included as part of the application process where requested or not;
- Information about your right to work in the UK;
- Information regarding your work history, qualifications, professional memberships, education, experience, or employment references;

We may also collect, store and use the following special categories of more sensitive personal data, which could include:

- Information about whether or not you have a disability for which we need to make reasonable adjustments as part of the recruitment process; and
- Information about criminal convictions and offences as the nature of our work requires this

More information about how we treat special categories of personal data is set out below.

### **How is your personal data collected?**

- We may collect this information in a variety of ways. For example, data might be collected through application forms; from correspondence with you; or through interviews or meetings.
- We may collect personal data about you from third parties, such as references supplied by former employers or agencies and information from criminal records checks permitted by law.

### **Where is your personal data stored?**

Your personal data will be stored in our recruitment files within our HR system, and in other IT systems (including our email system).

### **Why is your personal data processed?**

Under the GDPR, a data controller should only collect your personal data if it has a valid purpose for doing so that falls into one of the prescribed categories set out in the GDPR. The purposes for which we process your data are set out below.

- HCCG 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 the role and decide to whom it might be offered. We may also need to process data from job applicants to respond to and defend against legal claims.

- 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 formal employment starts.
- We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment.
- For all roles within HCCG we are 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 team members and employment to establish whether or not an individual has committed an unlawful act or been involved in dishonesty or other improper conduct.
- Where it is necessary to collect and process any special categories of sensitive personal data, we will ensure it is handled with the utmost discretion and will limit access to the information to the individuals who require it for the purposes of which it is being requested / processed.

If you have any questions as to why we hold any type of personal data about you, please contact the HCCG's Data Processing Officer (Rachel Gardiner-Hill).

### **Who has access to your data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the team involved in the recruitment process, administrative staff and interviewers, if access to the data is necessary for the performance of their roles.

HCCG will only share your data with third parties for the purposes of assessing your application. If your application is successful then this will only be with your nominated referees and we will contact them in order to obtain references for you and we will use your name within that correspondence, and we may contact the Disclosure and Barring Service to undertake necessary criminal records checks (if required for the nature of the role).

### **Is my data secure?**

We take the security of your data very seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by managers and administrative staff in the performance of their duties.

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.

## **How long do you retain my data for?**

We will not hold your personal data longer than we need it. If unsuccessful, generally we keep the majority of your information for the duration of the recruitment process plus an additional 12 months thereafter. If you are successful in your application, information collected as part of the recruitment process will be transferred to your personnel file and retained during your employment.

## **Your rights**

You also have the following rights when it comes to our handling of your data:

- Right of access – you have the right to request a copy of the personal data we have on you and to request supporting information explaining how the personal data is used
- Right of rectification – you have the right to request that we rectify inaccurate personal data about you
- Right of erasure – you have the right to request that we erase all personal data about you (please note that we may be able to reject or restrict the request in some circumstances, depending on the information we hold and our lawful reason to keep it)
- Right to restrict processing – in some situations, you have the right to request that we do not use the personal data you have provided (e.g. if you believe it to be inaccurate)
- Right to object– you have the right to object to certain processing of your personal data (unless we have overriding compelling grounds to continue processing)
- Right to data portability – where we are relying on your consent to use your information, you have the right to require us to provide you with a copy of your information for your use or transfer to another service provider.

If you would like to exercise any of these rights, please contact HCCG's Data Protection Officer at [rachelgh@hccounselling.org.uk](mailto:rachelgh@hccounselling.org.uk)

If you believe that the data controller has not complied with your data protection rights, you can complain to the Information Commissioner. Contact details for the ICO can be found at <https://ico.org.uk/> .

## **If you fail to provide personal data**

You are under no statutory or contractual obligation to provide data to HCCG 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. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

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.

Last Updated: January 2020