

Privacy Notice for Applicants

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1. Introduction

As part of our recruitment process, Strode Park Foundation collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meet our data protection obligations.

2. Our details

Data controller: Strode Park Foundation, Strode Park House, Lower Herne Road, Herne, Herne Bay, Kent, CT6 7NE.

Data protection officer: Kerry Bardsley, HR Director

3. General Data protection principles

In collecting and processing your personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

4. What personal information does Strode Park collect?

We collect 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;
- whether or not you have a disability for which we may need 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.

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs, or collected through interviews or other forms of assessment.

If appointed to the role, we will also collect personal data about you from third parties, such as references supplied by former employers, obtained from your passport or other identity documents and information from criminal records checks. We will only seek information from third parties once a job offer to you has been made and will inform you that we are doing so.

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Data will be stored in a range of different places, including on your application record, in our electronic HR management systems and on other IT systems (including email).

5. Why does Strode Park process personal data?

We need to process data to take steps at your request prior to entering into a contract of employment with you. We also need to process your data to enter into a contract of employment 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.

We have 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, we have considered whether or not those interests are overridden by the rights and freedoms of employees or workers and have concluded that they are not.

We process health information if we need to make reasonable adjustment 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.

Where we process 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, 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 for **six months** in case there are future employment opportunities for which you may be suited. We will ask for your consent before we keep your data for this purpose and you are free to withdraw your consent at any time. If unsuccessful after interview, we will remind you of your right to withdraw this consent. After six months, data will be shredded securely.

6. Who has access to 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.

We will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary

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background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We may transfer the personal data we collect about you to countries outside the EEA so long as there is a lawful basis for doing so or we have your consent. In certain circumstances we may seek your explicit consent to send your personal data outside of the EEA. When doing so we will inform you in clear terms of the data protection framework in place in the relevant countries in order to enable you to make an informed decision.

Before sending your personal data to countries outside of the EEA data we will ensure that adequate data protection provisions are in place, the processor has provided appropriate safeguards to ensure enforceable rights and legal remedies or other specified conditions are met under data protection law.

7. How does Strode Park protect data?

We take the security of your data 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 our employees in the proper performance of their duties.

Where Strode Park engages third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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.

8. For how long does Strode Park keep data?

Strode Park will hold your personal data for the duration of your employment. At the end of your employment, your employee file is held until your 75th birthday or 6 years after you leave employment; whichever is sooner.

9. 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 Strode Park to change incorrect or incomplete data;
- require Strode Park to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Strode Park is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Strode Park's Data Protection Officer (details above) stating you wish to make a **subject access request**. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you believe that we have not complied with your data protection rights, you can complain to the Information

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Commissioner. We would, however, like to have the opportunity to deal with your concerns before you approach the ICO so please contact us in the first instance.

10. What if you do not provide personal data?

You have some obligations under your employment contract to provide Strode Park with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide Strode Park with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable Strode Park to enter a contract of employment with you. If you do not provide other information, this will hinder our ability to administer the rights and obligations arising as a result of the employment relationship efficiently or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

11. Do we need your consent to use particularly sensitive information?

We do not need your consent if we use your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law.

12. Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

13. Automated decision-making

For information, employment decisions are not based solely on automated decision-making.

Version History				
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