

**Freebridge Community Housing**

**Privacy Notice for Applicants for Employment or Work**

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## **Freebridge Community Housing**

### **Privacy Notice for Applicant's for Employment or Work**

**Our Privacy Notice describes the categories of personal data we process and for what purposes. We are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulation (GDPR) and Data Protection Act 2018.**

#### **1. Introduction**

- 1.1 We take your privacy seriously and you can find out more here about your privacy rights and how we collect, use, share and secure your personal identifiable information. This includes the personal identifiable information we already hold about you now and the further personal identifiable information we might collect about you, either from you or from a third party. How we use your personal identifiable information will depend on the services we provide to you.
- 1.2 It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.
- 1.3 This Privacy Notice is a public document available when Freebridge Community Housing (Freebridge) obtain and use your personal identifiable information. It explains how we and appointed third party organisations/people use your personal identifiable information and it details your rights. We obtain your personal identifiable information in order to conduct our normal business operations as a registered social housing provider.
- 1.4 Our Data Protection Officer (DPO) provides help and guidance to make sure we apply the law to the processing and protection of your personal identifiable information.

Should you have any questions about how we use your personal identifiable information, our DPO can be reached by writing to us and addressing your letter to:

Data Protection Officer,  
Freebridge Community Housing,  
Juniper House,  
Austin Street,  
Kings Lynn,  
Norfolk PE30 1DZ;; or

Email us at [DataProtectionOfficer@freebridge.org.uk](mailto:DataProtectionOfficer@freebridge.org.uk)

- 1.5 Please also refer to Your Privacy Rights (section 3) for more information about your rights and how our DPO can help you.
- 1.6 This Privacy Notice provides up to date information about how we use your personal identifiable information with effect from 25<sup>th</sup> May 2018 and updates any previous information we have published/supplied about using your personal identifiable information. If we make any significant changes affecting how we use your personal identifiable information, we will make changes to this Privacy Notice, and we will contact you to inform you of these changes.

## **2. Who We Are**

- 2.1 Where we refer to 'we' or 'us' in this Privacy Notice, we are referring to Freebridge.
- 2.2 Freebridge is the 'data controller' of your personal identifiable information because we determine the use of this information. As a registered social housing provider, we are regulated by the Home & Communities Agency's (HCA) regulation directorate, the Regulator of Social Housing.

## **3. Your Privacy Rights**

- 3.1 From the 25 May 2018 you will have eight rights relating to the use and storage of your personal identifiable information. These are:
- The right to be informed.
  - The right of access.
  - The right to rectification.
  - The right to erasure.
  - The right to restrict processing.
  - The right to data portability.
  - The right to object.
  - Rights in relation to automated decision making and profiling.
- 3.2 In brief, you have the right to be informed who is obtaining and using your personal identifiable information, how this information will be retained, shared and secured and what lawful grounds will be used to obtain and use your personal identifiable information. You have the right to object to how we use your personal identifiable information in certain circumstances. You also have the right to obtain a copy of the personal identifiable information we hold about you.
- 3.3 In addition, you can ask Freebridge to correct inaccuracies, delete or restrict personal identifiable information or to ask for some of your personal identifiable information to be provided to someone else. You can make a complaint if you feel Freebridge is using your personal identifiable information unlawfully and/or holding inaccurate, inadequate or irrelevant personal identifiable information which if used may have a detrimental impact on you and/or has an impact on your rights.
- 3.4 You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority, about our collection and use of your personal data.

They can be contacted at:

Information Commissioner's Office,  
Wycliffe House,  
Water Lane, Wilmslow,  
Cheshire, SK9 5AF  
<https://ico.org.uk>.

- 3.5 To make enquires for further information about exercising any of your rights in this Privacy Notice, please contact Freebridge's DPO -- please also refer to Section 1 above.

#### **4. What Kinds of Personal Identifiable Information We Use:**

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

#### **4.2 Personal Information**

The information you have provided to us in your application for a role within Freebridge, including:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Place of birth.
- Previous surname.
- Gender.
- Marital status.
- Next of kin and emergency contact information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date.
- Location of employment or workplace.
- Copy of driving license.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records, qualifications and professional memberships).
- Office based CCTV footage and other information obtained through electronic means.
- Disclosure & Barring Service (DBS) records
- Any information you provide to us during an interview.
- Any test results as part of application process

#### **4.3 Special Information**

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

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

There are other types of special information which we do not collect but are deemed important under the law:

- Genetics;
- Biometrics (where used for ID purposes).

## **5. How We Gather Your Personal Identifiable Information**

5.1 We collect personal information about prospective employees, workers and contractors from the following sources:

- You, the candidate.
- Information provided by any recruitment agency we work with as part of recruitment for the role you have applied for.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees, from whom we collect the data from.

5.2 Some further examples of how we may gather your personal identifiable information are set out below:

- From monitoring or recording calls as part of our quality and complaints monitoring arrangements. We record these calls for training and to ensure the safety of our staff;; and
- From our office based CCTV systems for the prevention and detection of crime and to ensure the safety and security of our staff and individuals obtaining services from us.

## **6. How We Lawfully Use Your Personal Information**

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

- Assess your skills, qualifications, and suitability for the work or 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, including checking you are legally entitled to work in the UK.

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

6.3 We also need to process your personal information to decide whether to enter into a contract of employment with you.

6.4 Having received your application form and the results from any relevant tests required for the role 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 or work.

6.5 Should we decide to offer you the role or work, we will then take up references and/or carry out a criminal record and/or any other check agreed before confirming your appointment.

### **6.6 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 references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## **7 How We Use Sensitive Personal Information.**

7.1 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 your interview process,
- 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.

## **8 Information about Criminal Convictions**

8.1 We will process information about criminal convictions if a DBS is required for the role you have applied for.

8.2 We will collect information about your criminal convictions history if we would like to offer you the work or role, conditional on checks and any other conditions, such as references, being satisfactory, in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

## **9 Automated Decision Making**

9.1 We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **10 Data Sharing**

10.1 We may share your personal information with third parties only for the purposes of processing your application. 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.

10.2 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.

10.3 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.

## **11 Transferring information outside the EU**

11.1 We do not normally transfer your information outside the UK. There may be some occasions when your information leaves the UK because a third party has servers outside the UK; on such occasions, we will take steps to ensure that your information is processed securely.

## **12 Data Retention**

12.1 We will retain your personal information for a period of 12 months after we have

communicated to you our decision about whether to appoint you to the role or work. 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 applicable laws and regulations.

- 12.2 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.

## 13 Rights of Access, Correction, Erasure and Restriction

### 13.1 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 application for employment or work with us.

### 13.2 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.

- 13.3 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 DPO in writing.

## 14 No Fee Usually Required

- 14.1 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 clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such

circumstances.

- 14.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **15 Right to Withdraw Consent**

- 15.1 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:

Human Resources Business Partner,  
Freebridge Community Housing,  
Juniper House,  
Austin Street,  
Kings Lynn,  
Norfolk  
PE30 1DZ;;

*Email: [HRTeam@freebridge.org.uk](mailto:HRTeam@freebridge.org.uk)*

- 15.2 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.

## **16 Changes to this Privacy Notice**

- 16.1 We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.