

Employee Applicant Privacy Notice (compliant with GDPR)



halow Project is a registered charity operating with a Care Quality Commission (CQC) registered department **halow** Care.

As part of any recruitment process, **halow project** collects and processes personal data relating to volunteer applicants. **halow project** is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information do we collect?

halow 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;
- Eligibility to work status.
- whether or not you have a disability for which **halow project** needs to make reasonable adjustments during the recruitment process.
- Whether or not you have ever been convicted of an offence or are there any proceedings pending against you.

Halow project may collect this information in a variety of ways. For example, data might be contained in application forms, CVs, covering letters or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

We may also collect personal data about you from third parties, such as references supplied by former employers. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

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

Why does halow process personal data?

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



In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is mandatory to check a successful applicant's eligibility to work in the UK before employment starts. Due to the nature of the work **halow project** undertakes some of our roles are exempt to legislation under [Rehabilitation Offenders Act 1974](#), meaning we can request information regarding any spent or unspent convictions and / or cautions that you may have.

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

Halow project may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. We may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. We process such information to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, **halow's** Application Tracking System retains personal data on file for a period of six months in case there are future employment or voluntary 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.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers of projects with the employment vacancy and IT staff if access to the data is necessary for the performance of their roles (e.g. administration volunteering).

We will not share your data with third parties, unless your application is successful and we make you an offer for employment. We will then share your data with your referees to obtain references for you.

halow works with other Applicant Tracking Systems and job board integrations to ensure an efficient and smooth application process. For information on how these organisations access data and their individual privacy notices please get in contact with us.

How does halow project protect data?

We take the security of your data seriously. We have 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.

For how long does halow keep data?

If your application for employment in respect of a **halow project** role is unsuccessful, **halow project** will hold your data on file for 6 (six) months after the end of the relevant recruitment process. If you agree to allow us to keep your personal data on file, we will hold your data on file for





a further 6 (six) months for consideration for future employment or volunteering opportunities. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed. You will be asked when you submit your CV whether you give us consent to hold your details for the full 12 months in order to be considered for other positions or not.

Unsuccessful applications for roles within our registered service (halow Care)

If your application for employment for a role within our CQC registered care service is unsuccessful, **halow** will hold your data on file 2 years after the end of the relevant recruitment process this is an enhanced period of time due to Care Quality Commission requirements.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your Human Resources file (electronic and paper based) and retained for the duration of your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

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 **halow** to change incorrect or incomplete data;
- require **halow** 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 **halow** is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Nicholas Holt at hr@halowproject.org.uk

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

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to **halow** 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.

