

## Privacy Statement for Job Applicants

|   |   |
|---|---|
| 1. Overview .....   | 2 |
| 2. What personal data does GreenSquareAccord Limited collect? .....     | 3 |
| 3. How do we collect personal information? .....                        | 4 |
| 4. Why does GreenSquareAccord Limited process your information? .....   | 4 |
| 5. Where does GreenSquareAccord Limited store your information? .....   | 5 |
| 6. Who has access to your information?.....                             | 5 |
| 7. How does GreenSquareAccord Limited protect your information?.....    | 6 |
| 8. How long does GreenSquareAccord Limited keep your information? ..... | 6 |
| 9. What are your rights? .....  | 6 |
| 10. What if you do not provide personal information? .....              | 7 |
| 11. Social Media .....  | 7 |
| 12. Changes to our Privacy Statement.....                               | 7 |

## **1. Overview**

GreenSquareAccord Limited is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you when you apply for a job with us, in accordance with the UK's Data Protection Act 2018 which includes the UK's General Data Protection Regulation (UK GDPR). This requires us to be transparent about the personal data that we hold and how it is used.

GreenSquareAccord Limited operates both as a data controller and a data processor of your personal data.

### **GreenSquareAccord as a Data controller**

Typically this occurs when you apply directly for a role with GreenSquareAccord or via a web-based job application service where your personal data is sent directly to us.. This means that we are responsible for deciding how we hold and use personal information about you.

### **GreenSquareAccord as a Data Processor**

Typically, this is where you do not provide us with your personal data directly but via a job application website. In this instance we will process the personal data in exactly the same manner, but we will have a Data Sharing Agreement with the third party who provides the job application service.

We are required under data protection legislation to notify you of the information contained in this privacy notice.

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.

We have published this statement to tell you:

- What personal information we may collect about you
- Why we process it
- Where we store it
- Who has access to it
- How we protect it
- How long we keep it for
- Your rights, and
- What happens if you do not provide personal information.

This notice does not form part of any contract of employment.

### **Data Protection Principles**

We will comply with data protection law. This says that the personal information we hold about you must be:

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

## 2. What personal data does GreenSquareAccord Limited collect on prospective employees?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are “special categories” of more sensitive personal data which require a higher level of protection.

### **Information related to your application for employment**

We use this information to manage your application, to assess your suitability for a role, and in order to consider you for employment. We will also use it for legal and regulatory purposes. This includes:

- **Personal contact details** such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses
- **Detailed personal information** such as age, gender, date of birth, NI number, information about your marital status, next of kin, dependants and emergency contacts
- **Recruitment information** including references and other information included in a CV or cover letter or as part of the application process
- **Information about your entitlement to work in the UK**, including a copy of your passport or similar photographic identification and /or proof of address documents
- **Employment and education history** including your qualifications, skills, experience and employment history, including any gaps in employment, job titles, work history and professional memberships.
- **A copy of your driving licence**
- **Information about your current remuneration**, including entitlement to benefits such as pensions or insurance cover
- **Details of any secondary employment, gift declarations or conflict of interest declarations**, including whether you are an GreenSquareAccord Limited tenant, previous tenant or related to an existing employee, board member or GreenSquareAccord Limited contractor
- **Your bank account details** to process payroll records and tax status information

### **Information relating to your health and wellbeing and other special category data**

We use the following information to comply with our legal obligations, to process your application and for equal opportunities monitoring.

**Security and DBS check details** including basic checks and enhanced disclosures according to your role

- **Details of criminal convictions**, including details of any cautions or convictions you have, any pending criminal charges and any driving endorsements
- **Health and wellbeing information** including information about your health, any medical conditions, health and sickness records and where applicable your health and mental fitness for the post under Schedule 3 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014

- **Information you have provided regarding Protected** Characteristics as defined by the Equality Act, Including racial or ethnic origin, religious beliefs, disability status, gender identification, sexuality, social mobility and caring responsibilities
- **Details of any disabilities** for which we need to make reasonable adjustments during the recruitment process or beyond

### 3. How do we collect personal information?

We may collect this information **directly from you**. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you, from correspondence with you, or through interviews, meetings or other assessments.

We may obtain the information, or related information, **from our partner organisations and third parties**, such as recruitment agencies, references supplied by former employers, information from employment background check providers and information from criminal records checks permitted by law.

We may also **record factual information** from time to time such as in an interview scenario. If you make a complaint, we will keep the details separate from our other information about you.

### 4. Why does GreenSquareAccord Limited process your information?

We will only use your personal information where the law allows us to, this is known as our lawful basis of processing. We will process your data for the following reasons:

- **Where you have provided your consent** for us to use your data for a specific purpose
- **To determine whether to offer you a contract of employment**, processing data from job applicants allows GreenSquareAccord to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job
- **To comply with our legal obligations**, for example to check your entitlement to work in the UK, to comply with employment and health and safety laws to prevent fraud and to respond to legal claims
- **Where we have a legitimate interest**, for example to contact you in the event of an unplanned event

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests)
- Where it is needed in the public interest or for official purposes.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Where GreenSquareAccord Limited processes special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, information about health or medical conditions and criminal convictions this is done for the purposes of legal obligation such as employment law, diversity and inclusion monitoring. We may anonymise this type of information so that it cannot be linked to you. In limited circumstances, we may rely on your explicit written consent. If we need your consent, we will contact you separately about this.

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation and disability status, to ensure meaningful equal opportunity monitoring and reporting and to comply with employment and other laws.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

### Information about Criminal Convictions

We will only collect information about criminal convictions if it is appropriate given the nature of the role applied for and where we are legally required or able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of the recruitment process. We will use information about criminal convictions and offences as part of the assessment for initial hiring.

GreenSquareAccord will not use your data for any purpose other than the recruitment exercise for which you have applied.

## 5. Where does GreenSquareAccord Limited store your information?

We will hold your personal information securely and limit access to it. This means only those colleagues and partners that need to see it, have access.

Data is stored in a range of different places, including in your electronic HR file, in our HR information management systems and in other IT systems (including our email system).

If we can store your personal information solely on computers, we will; however, there will be cases where we have paper copies instead or as well.

We will not transfer or process your data in countries outside the European Economic Area.

## 6. Who has access to your information?

Normally only GreenSquareAccord Limited will be able to access your personal information, however there may be times when we disclose your details to others.

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 in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Your information may be **shared with organisations within the GreenSquareAccord Limited group of companies** as detailed via our web site here: [Company details - GreenSquareAccord](#).

We may **share data with third parties** if your application is successful, to make and offer of employment, to obtain pre-employment references from other employers, obtain employment

background checks from third party providers and obtain necessary criminal records checks from the Disclosure and Barring Service.

We may **share your data others who have a legal right to request information** from us for their own purposes:

- For crime prevention or detection, risk assessment, insurance, resolution of complaints or other issues
- Local authorities, safeguarding boards, regulators, government departments and other public authorities, such as for safeguarding, preventing payment errors or fraud
- The police, fire service, health authorities or medical practitioners; and
- Regulatory bodies (such as the Care Quality Commission, Service or the Regulator of Social Housing).

We **will not** give anyone else access to your information in return for payment for their marketing or commercial purposes.

## 7. How does GreenSquareAccord Limited protect your information?

We take the security of your data seriously and 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 employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, we do so based on written instructions, under a duty of confidentiality and with the implementation appropriate technical and organisational measures to ensure the security of data.

## 8. How long does GreenSquareAccord Limited keep your information?

If your application for employment is unsuccessful, we will hold your data on file for 24 months after the end of the relevant recruitment process. At the end of that period, your personal data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your personal data will be held will be provided to you in a new privacy notice.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## 9. What are your rights?

As a Data Subject, you have rights under UK GDPR law. You can:

- access and obtain a copy of the information we hold about you (see 'accessing the information we have about you' below)
- require GreenSquareAccord Limited to change incorrect or incomplete data
- require GreenSquareAccord Limited to delete or stop processing your data in certain circumstances, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data in certain circumstances

If you would like to exercise any of these rights, please contact the data protection team [data.protection@greensquareaccord.co.uk](mailto:data.protection@greensquareaccord.co.uk)

### **Accessing the information we have about you**

You have a legal right to access information that we hold about you; this is called a Subject Access Request (SAR). The quickest way to do this is by emailing the data protection team at [data.protection@greensquareaccord.co.uk](mailto:data.protection@greensquareaccord.co.uk) but you can also ask us for this verbally or in writing.

We will acknowledge your request within 10 working days and give a full response within one calendar month, except where the request is complex. In most cases we will be able to comply with your request, however we may not be able to fulfil your request if your personal information contains details about another person or is subject to another exemption.

You can find more information and a Subject Access Request form on our website. You do not have to use this form, but it may help us to process your request more efficiently if you do.

### **Further information and support**

The information rights regulator in the UK is known as the Information Commissioners Office or the ICO. They provide useful reference material guidance and advice to support individuals' information rights. You can also complain to the ICO where you believe we have not handled your information in line with data protection legislation. Please visit [www.ico.org.uk](http://www.ico.org.uk) for more information.

## **10. What if you do not provide personal information?**

You are under no statutory or contractual obligation to provide data to GreenSquareAccord during the recruitment process. However, if you do not provide the information, GreenSquareAccord may not be able to process your application properly or at all.

## **11. Changes to our Privacy Statement**

This Statement may be updated or changed from time to time. We will display the new Statement in all places where it can usually be found, such as on our website.