

UK GDPR Privacy notice for job applicants

1. What is the purpose of this document?

Ealing Community Transport is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

2. Data protection principles

We will comply with data protection law, which 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; and
- kept securely.

3. The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you (if applicable):

- the information you have provided to us in your curriculum vitae and covering letter (if applicable);
- the information you have provided on our application form (including name, title, address, telephone number, personal email address, employment history, qualifications, right to work information and driving licence information); and
- any information you provide to us during an interview.

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

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your health, including any medical condition, health and sickness records;
- information about criminal convictions and offences.

4. How is your personal information collected?

We collect personal information about candidates from the following sources:

- you, the candidate;
- recruitment agency (if applicable);
- job listings website (if applicable);
- Disclosure and Barring Service in respect of criminal convictions (where the role is exempted from the Rehabilitation of Offenders Act 1974);
- DVLA (if applicable); and
- your named referees.

You are under no statutory or contractual obligation to provide personal information to us during the recruitment process.

Your personal information may be stored in different places, including on your application record, in our HR management system and in other IT systems, such as the e-mail system.

5. How we will use information about you

We will only use your personal information when the law allows us to. We will use the personal information we collect about you to:

- assess your skills, qualifications, and suitability for the role;
- carry out background and reference checks (where the role is exempted from the Rehabilitation of Offenders Act 1974);
- communicate with you about the recruitment process;
- keep records related to our hiring processes; and
- comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you since it would be beneficial to our business to appoint someone to that role. We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV, covering letter and/or application form (as applicable), 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. If we decide to offer you the role, we will then take up references and carry out a criminal record check (where the role post is exempted from the Rehabilitation of Offenders Act 1974) before confirming your appointment.

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 a credit check or 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 particularly sensitive personal information

We will use your particularly sensitive personal information in the ways outlined below.

- 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 an interview.
- 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

If you are applying to a role as a driver or passenger assistant, we envisage that we will process information about criminal convictions. We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. The role of driver and passenger assistant are exempted from the Rehabilitation of Offenders Act 1974 so is eligible for an enhanced check from the Disclosure and Barring Service.

We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

9. Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making. However, as permitted by law, one of our recruitment decisions is based on automated decision-making (that is, on Indeed, candidates for driving roles are asked to confirm whether or not they have a D1 licence, and if they answer 'no', their application is automatically precluded from entering the next stage of the recruitment process).

10. Data sharing

We will only share your personal information with the following third parties for the purposes of processing your application: BambooHR. All our third-party service providers and other entities in the group 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.

11. Data security

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. Details of these measures may be obtained from the Data Protection Officer.

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.

12. Data retention

If unsuccessful in obtaining the role, we will retain your personal information for a period of 12 months after we have communicated to you our decision not to appoint you. 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 our Data Protection Policy.

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.

If successful in obtaining the role, we will retain your personal information in accordance with our privacy notice for employees.

13. Rights of access, correction, erasure, and restriction

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.

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 Data Protection Officer in writing.

14. Data protection officer

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact them via email at becky.casement@ectcharity.co.uk, by mail to Becky Casement, ECT Charity, Greenford Depot, Greenford Road, Greenford, Middlesex UB6 9AN, or by phone at 020 8813 3210.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.