

## **HEAD FIRST PRIVACY NOTICE FOR JOB APPLICANTS**

**Data controller: "Head First", of Grove Mills, Cranbrook Road, Hawkhurst, Kent TN18 4AS Tel: 01580 752275 Email: info@head-first.org**

**Data compliance officer: Jo Clark-Wilson - contact details as above.**

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

### **What information does Head First collect?**

Head First collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number and mobile number;
- your National Insurance number;
- details of your education, training, qualifications, skills and experience;
- current employment, and your employment history including your reasons for leaving and reasons for any gaps in employment;
- details of any professional memberships;
- information about your current level of remuneration;
- information about other activities outside of work;
- whether or not Head First needs to make reasonable adjustments for you during the recruitment process;
- interview notes;
- copy of your driving licence;
- details of people who will provide a reference for you;
- information about your entitlement to work in the UK and copies of proof of right to work documents; and
- information about criminal convictions and offences.

Head First collects this information in a variety of ways. For example, data might be contained in application forms and CVs, obtained from your passport or other identity documents, or collected through interviews.

Head First will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so. Third parties from whom we will seek information include references supplied by former employers and information from criminal records checks (Disclosure and Barring Service).

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

### **Why does Head First process personal data?**

Head First needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, Head First needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

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

Where Head First relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Head First processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

For some roles, Head First is obliged to seek information about criminal convictions and offences. Where Head First seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Head First will keep your personal data on file in case there are future employment opportunities for which you may be suited. Head First will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team and interviewers or interested parties involved in the recruitment process.

Head First will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Head First will then share your data with former employers to obtain references for you and the Disclosure and Barring Service to obtain necessary criminal records checks.

Head First will not transfer your data outside the European Economic Area.

### **How does Head First protect data?**

Head First takes the security of your data seriously. It has 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 staff members in the proper performance of their duties. Details of internal policies and controls include password protected access, IT back-up and recovery, and locked cabinets for paper records.

## **For how long does Head First keep data?**

If your application for employment is unsuccessful, Head First will hold your data on file for no longer than is necessary after the end of the relevant recruitment process. At the end of that period your data will be deleted and/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 data will be held will be provided to you in a new privacy notice.

## **Your rights**

As a candidate in the recruitment process you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Head First to change incorrect or incomplete data;
- require Head First to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where Head First is relying on its legitimate interests as the legal ground for processing; and
- ask Head First to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override Head First's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact Hayley Ranson, Human Resources Manager, [hr.team@head-first.org](mailto:hr.team@head-first.org)

If you believe that Head First 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 Head First during the recruitment process. However, if you do not provide the information, Head First may not be able to process your application properly or at all.

## **Automated decision-making**

Our recruitment processes are not based on automated decision-making.