

<b>Policy</b>	<b>Recruitment Privacy Notice</b>
<b>Date of last Board review</b>	<b>January 2025</b>
<b>Next review date</b>	<b>January 2027</b>
<b>Approved and authorised by</b>	<b>Jenni Anderson, CEO</b>

As someone who is applying for a position at The Talent Foundry Trust (TTF) this notice explains:

- what personal data (information) we will hold about you,
- how we collect it, and
- how we will use and may share information about you during the application process.

We are required to notify you of this information, under data protection legislation. Please ensure that you read this privacy notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### **Who collects the information**

TTF is known as a ‘data controller’ and gathers and uses certain information about you. This information is needed to process your application and we do not share it with anyone outside of our organisation, unless it is necessary and in your interest.

### **Data protection principles**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

### **What information**

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Details of your education and qualifications, experience, employment history, and working hours, reasons for leaving previous employment and interests;
- Information on your nationality and right to work in the UK;
- Information regarding your criminal record;
- Details of your referees.

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Information regarding your academic and professional qualifications;
- Information regarding your criminal record, in criminal records certificates, enhanced criminal records certificates;
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- A copy of your driving licence.
- Proof of your address (which may include previous addresses).

You are required by law or in order to enter into your contract of employment to provide the categories of information to enable us to verify your right to work and suitability for the position.

## **How we collect the information**

We may collect this information from you directly, your referees (details of whom you will have provided), your education provider, any relevant professional body, the Disclosure and Barring Service (DBS), the Home Office.

## **Why we collect the information and how we use it**

We will typically collect and use this information for the following purposes (other purposes that may also apply are explained in our General Privacy Notice Data Protection Policy):

- to take steps to enter into a contract;
- for compliance with a legal obligation (e.g. our obligation to check that you are eligible to work in the United Kingdom);
- for the performance of a task carried out in the public interest; and
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

## **How we may share the information**

We may also need to share some of the above categories of personal information with other parties such as the company who processes our payroll (if you are appointed). The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

## **Special categories of data and criminal records information**

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are in our Recruitment of ex-offenders Policy.

## **Where information may be held**

Information is held in databases online and third-party agencies, service providers, representatives and agents as described above.

## **How long we keep your information**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed or engaged by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination, after which they will be destroyed. Normally this would be for 6 months.

If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

Further details on our approach to information retention and destruction are available in our Data Protection Policy.

**Your rights to correct and access your information and to ask for it to be erased**

Please contact our Data Protection Officer, who can be contacted by phone or by e-mail [jenni.anderson@talentfoundry.org.uk](mailto:jenni.anderson@talentfoundry.org.uk) if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice.

You also have the right to ask our Data Protection Officer for some, but not all of the information we hold and process, to be erased (the ‘right to be forgotten’) in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you ask for it.

**Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**How to complain**

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

**Information we collect – further details**

1. Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process. Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages.	To enable HR personnel (or the manager of the relevant department) to contact you to progress your application, arrange interviews and inform you of the outcome. To inform the relevant manager of your application.

Details of your qualifications, experience, employment history (including current or previous job titles, reason for leaving and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process. Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.	To make an informed recruitment decision. If you are invited for interview, the interviewer will receive your details.
Information regarding your criminal record	From you, in your completed application form	To comply with our legal obligations. For reasons of safeguarding children and young people.	To make an informed recruitment decision. To carry out statutory checks. Information shared with DBS and other regulatory authorities as required.
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process To comply with our obligations on safeguarding.	To carry out a fair recruitment process. To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

#### B. Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit. To comply with our legal obligations. Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice.	To obtain the relevant reference about you. To comply with legal/regulatory obligations. Information shared with relevant managers and HR personnel.
Information regarding your academic (and professional is applicable) qualifications	From you, from your education provider or from the relevant professional body.	Legitimate interest: to verify the qualifications information provided by you.	To make an informed recruitment decision.

Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs)	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract. To comply with our obligations around safeguarding Legitimate interest: to verify the criminal records information provided by you.	To make an informed recruitment decision. To carry out statutory checks. Information shared with DBS and other regulatory authorities as required.
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/performance the employment contract. To comply with our legal obligations. Legitimate interest: to maintain employment records.	To carry out right to work checks. Information may be shared with the Home Office.
A copy of your driving licence and other proof of address	From you	To enter into/performance the employment contract. To comply with our legal obligations	To make an informed recruitment decision.