



# Privacy Notice

## Job applicants

<b>Date Approved by IGG:</b>	9 September 2024
<b>Date Due for Review:</b>	9 September 2027
<b>Responsible Officer:</b>	Information Governance Manager

## Privacy Notice - Job applicants

**Data Controller:** Vico Homes, Merefield House, Whistler Drive, Castleford, WF10 5HX

**Data Protection Officer:** [informationgovernance@vicohomes.co.uk](mailto:informationgovernance@vicohomes.co.uk)

As part of any recruitment process, we collect and process personal data relating to job applicants. We're transparent about how we collect and use data while meeting data protection obligations. The information in this privacy notice explains how and why your data is collected and processed as a job applicant. If you're successful in your application and become a Vico Homes colleague, the 'Vico Homes Colleague Privacy Notice' will apply.

### What information do we collect?

We collect a range of information about you. This includes:

- Your name, address and contact details (including email address and phone number)
- Reference details (including current or previous employer and character references)
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration (including benefit entitlements)
- Whether or not you have a disability, for which we need to make reasonable adjustments during the recruitment process and any future employment
- Information about your entitlement to work in the UK
- Any previous criminal convictions
- Information on close working relationships or any direct involvement in the management of a company, firm, business or statutory to comply with the Housing Act 1996
- Equal opportunities monitoring information (including information about your ethnic origin, sexual orientation, health and religion or belief)



## How do we collect the data?

We collect most of this data through the application form. However, data is also collected in other ways, for example, your passport or other identity documents, qualification certificates or through interviews and other forms of assessment.

We will also collect personal data about you from third parties, such as references supplied by former employers and other referees who are willing to supply character references.

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

## Why do we process personal data?

We need to process data before entering into and forming a contract with you.

In some cases, we need to process data to comply with legal obligations. For example, to check a successful applicant's eligibility to work in the UK before employment starts.

We may also need to process data from job applicants to respond to and defend against legal claims.

## Special category data

We process health information relating to job applicants, to make reasonable adjustments to the recruitment process for candidates who have a disability or underlying health condition. This is to carry out legal obligations and exercise specific rights in relation to employment. This information isn't used as part of the selection process.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, this is for equal opportunities monitoring purposes only. This information isn't used as part of the selection process.

When employment is offered, we will ask you to provide information about unspent criminal convictions and offences using the Disclosure and Barring Service (DBS). This information is necessary for us to carry out obligations and exercise specific rights in relation to employment.

We will process special category data and criminal records information in accordance with the policy on processing such data.

## Future processing

If your application is unsuccessful, we may keep your personal data on file in case there are future employment opportunities that you might be interested in. We will ask for your consent before we keep your data for this purpose, and you're free to withdraw your consent at any time. If you don't want us to keep your data for future employment opportunities, then your data will be held and destroyed as set out below.

**Commented [LG1]:** Is this for every role or just some?

**Commented [SE2R1]:** We ask all about criminal convictions on the application form but only undertake DBS checks for certain roles



## Who has access to your data and how will we share it?

Your information will be shared internally for recruitment purposes. This includes members of the HR Team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT colleagues if access to the data is necessary for the performance of their roles.

We won't share your data with third parties unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to get references for you, other referees to supply confidential character references, an occupational health provider to obtain confirmation of your fitness for employment in the role you have been offered, and the DBS to obtain necessary criminal records checks.

## Where information may be held

Information is held at our offices and those of third-party agencies, representatives and agents as described above.

We use data processors. These are third parties who provide elements of services.

We have contracts in place with data processors which means they can't do anything with your personal information unless we instruct them to. They won't share your personal information with any organisation apart from us. They will hold it securely and retain it for the period instructed. When it's necessary for us to transfer your personal information outside the UK, this will only be done in accordance with the UK General Data Protection Regulation.

## How long do we keep data?

If your application for employment is unsuccessful, we will, as a matter of course, hold your data on file for twelve months after the end of the relevant recruitment process. At the end of that period, or if you withdraw your consent, your data will be deleted or destroyed unless we have a continuing legal basis to continue to hold that information (for example, it's necessary to ongoing legal proceedings).

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personal file (electronic) and retained for the duration of your employment. After you're appointed to a role, further information will be provided to you in the form of the 'Vico Homes Colleague Privacy Notice', as outlined earlier in this document.

**Commented [SE3]:** Updated in line with revised policy

**Commented [SE4]:** Updated as we no longer create paper files

## What if you do not provide personal data?



You're under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you don't provide the information, we may not be able to process your application.

## Automated decision making

Our recruitment processes are not based solely on automated decision making. Automated decision making may be used in certain circumstances, but this would be alongside other assessment methods, involving human intervention.

## Your rights

Please read our [Data Protection Rights Notice](#) which tells you how to contact us and make a complaint.

