

Schedule 28 - Job Applicant Privacy Notice

General

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 notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Topics:

- **Who collects the information**
- **Data protection principles**
- **About the information we collect and hold**
- **Where information may be held**
- **How long we keep your information**
- **Your rights to correct and access your information and to ask for it to be erased**
- **Keeping your personal information secure**
- **How to complain**

Who collects the information

Graham + Sibbald is a “data controller” and gathers and uses certain information about you.

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/ Employee Privacy Notice.

About the information we hold

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

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.

Where information may be held

Internally your personal information may be held and shared with the following people. Access to this information is limited to that required by each individual to perform their role:-

- Employees in HR, Compliance + Operations
- Manager of relevant department recruiting

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 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 time limits for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. 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. For further information, see our Employee Privacy Notice

Further details on our approach to information retention and destruction are available in our Records Management Policy.

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

Please contact our Data Protection Officer (DPO), who can be contacted at datacontroller@g-s.co.uk if (in accordance with applicable law) 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

If you have any queries or concerns about this notice or about our use of your personal information, please contact our Data Protection Officer.

If our Data Protection Officer is not able to address your query or concern, you can 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.

The Schedule

About the information we collect and hold

Part A: 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
<p>Your name and contact details (i.e. address, home and mobile phone numbers, email address)</p>	<p>From you</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>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</p> <p>To inform the relevant manager or department of your application</p>
<p>Details of your qualifications, experience, employment history (including job titles and working hours) and interests</p>	<p>From you, in the completed application form and interview notes (if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details</p>
<p>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</p>	<p>From you, in a completed anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see * below</p>
<p>Information regarding your criminal record ***Please note – will not asked for until the point an offer is made</p>	<p>From you, in your completed application form</p>	<p>To comply with our legal obligations</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with Disclosure Scotland, DBS and other regulatory authorities as required</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		protecting the public against dishonesty)	For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process In the regulated sector, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Part 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 <input type="checkbox"/>	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 qualifications <input type="checkbox"/>	From you, from your education provider, 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) <input type="checkbox"/>	From you and from Disclosure Scotland or the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal	To make an informed recruitment decision To carry out statutory checks Information shared with Disclosure Scotland, the

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
		records information provided by you For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/>	From you and, where necessary, the Home Office	To enter into/perform 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 <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

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

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Employee Privacy Notice and Criminal Records Information Policy.

This document was last reviewed 5th June 2023

