

Job Applicant Privacy Notice

St Michaels Homes Ltd is committed to ensuring transparency about how it collects and uses job applicant data and to meeting its data protection obligations. During the recruitment process, St Michaels Homes Ltd will collect and process personal data relating to job applicants as outlined below.

What information is collected?

A range of relevant information may be collected about those who submit a job application to the Company, whether via CV, covering letter, supporting documents, qualification certificates, or application form. This may include:

- your name, address and contact details, including email address and telephone number;
- information about your current level of remuneration, including benefit entitlements;
- details of your qualifications, skills, experience and employment history;
- whether or not the company needs to make a reasonable adjustment during the recruitment process in respect of a disability;
- information about your eligibility to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, disability and religion or belief.

As noted, this information may be collected in a number of ways, such as through information contained within application forms, CVs or resumes, cover letters, supporting application documents, passport or other identity documents, or collected through interviews or other forms of assessment.

Where necessary, St Michaels Homes Ltd may also collect personal data about you from third parties, such as health questionnaire information from an Occupational Health service to help ensure additional control measures are considered where required, or information from criminal records checks. Any such information will only be sought from third parties on an applicant's receipt of a job offer and with them having been informed prior to any request being made.

Data will be stored in secure locations within the Company, such as; your application records, in HR and Payroll systems and on other secure IT systems (including email).

Why is personal data processed?

St Michaels Homes Ltd has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process.

Processing job applicant data facilitates the company's management of the recruitment process and allows us to assess and confirm a candidate's suitability for employment in the consideration of to whom to offer a job.

Personal data is processed only as necessary to fulfil the steps of the recruitment process and is done so in order to take the steps requested by you which are required prior to entering into a contract of employment.

Data is also processed in order to comply with our legal obligations, for instance in the performance of checking an applicant's eligibility to work in the UK before employment starts. St Michaels Homes Ltd may also process job applicant data to respond or defend against legal claims.

In order to carry out obligations and exercise specific rights in relation to employment, the Company may process information about whether reasonable adjustment are required to the recruitment process in support of candidates who have a disability.

Other special categories of data relating to ethnic origin, sexual orientation, disability or religion or belief, will only be processed for equal opportunities monitoring purposes.

Where roles require St Michaels Homes Ltd to seek information about criminal convictions and offences, we will do where necessary to carry out obligations and exercise specific rights in relation to employment or fulfilment of a position.

Your data will not be used for any purpose other than the recruitment exercise for which you have applied.

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

Who has access to applicant data?

Information may be securely shared internally for the purposes of the recruitment exercise. This includes members of the recruitment team, shortlisting and interview panel members involved in the recruitment process (this may include external panel members and business consultant) and IT staff if access to the data is necessary for the performance of their roles.

Your data may be shared securely with St Michaels Homes Ltd approved third parties in order to:

- Obtain references as part of the recruitment process
- Obtain HR advice relating to the legitimate interest of the organisation, as set out above.

Data may be shared with such third parties where relevant and necessary in the following instances;

- With referees provided by you in order to obtain a reference during recruitment;
- With an external member of the recruitment panel, such as a board member or consultant, where relevant in order to make up part of the recruitment assessment process;
- With our external HR Provider in assistance with the recruitment and onboarding process;
- With our bank where it is necessary to make payment in instances such as reimbursement of approved expenses;

- With the UK Visas and Immigration department in order to perform relevant right to work checks;
- Disclosure & Barring Service (DBS) on offer of employment;
- Companies or organisations providing specific services to, or on behalf of the company, for other reasons such as Occupational Health Services, on offer of employment.

The organisation will not transfer your personal information to countries outside of the European Economic Area.

How is your data protected?

St Michaels Homes Ltd takes data security seriously and has implemented process to guard and protect data against accidental loss or disclosure, destruction or abuse.

Personal data is stored within secure IT systems with access restricted to those who have a legitimate purpose to view it. Any hard copy data will be stored in a secure filing cabinet with the same restricted access process applied.

Where your personal information is shared with third parties, we require that appropriate technical and organisational security measures are met to protect your personal data, that data is treated subject to a duty of confidentiality and in accordance with data protection laws. Such parties are only allowed to process your data for specified purposes and in accordance with our written instructions. They are not permitted to use your personal information for their own purposes or business interests.

St Michaels Homes Ltd also has in place procedures to deal with suspected data breaches and will notify the Commissioner's Office (or other applicable supervisory authority) and individuals of a suspected breach where legally required to do so.

How long is data kept?

St Michaels Homes Ltd will only keep your data for as long as is necessary.

If your application is unsuccessful we will keep your data for six months once the recruitment exercise ends. If you agree, your data may also be considered for other employment opportunities for six months. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent. Third parties will also be required to destroy or erase such information where applicable.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file (in hard copy or electronic format, or both), and Payroll systems and retained for the duration of your employment.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the company to change incorrect or incomplete data;

- require the company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact the Data Protection Officer using the contact details provided at the end of this Policy.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However in some cases, we may continue to use the data if so permitted through a legitimate interest for doing so. If you believe that the company has not complied with your data protection rights, you can contact the Information Commissioner.

If you do not provide your data

There is no statutory or contractual obligation to provide data to St Michaels Homes Ltd during the recruitment process. However, if you do not provide the information, St Michaels Homes Ltd may not be able to process your application effectively or at all.

Automated decision-making

St Michaels Homes Ltd recruitment processes are not based solely on automated decision-making.

Consent

Please confirm that you have read this privacy notice and understand that;

- you may ask to see the data and check its accuracy at any time via a subject access request (SAR).
- You may ask for a copy of personal data held about you at any time, and request this free of charge.
- You may request that data that is no longer required to be held can be removed and destroyed.
- That if my application for employment is unsuccessful, the organisation will hold my data on file for 6 months after the end of the relevant recruitment process.
- If unsuccessful, you also agree that the Company may keep your data for 6 months in consideration of any other suitable employment opportunities.
- At the end of the 6 month period, or when you withdraw your consent if sooner, your data is deleted or destroyed.

Contact Details

Address: St Michaels Homes Ltd, Dudbrook Hall, Dudbrook Road, Kelvedon Hatch, Brentwood, CM14 5TQ.

Contact Details: **Amanda Brewster, 01277 372095 opt 4**