

GDPR PRIVACY NOTICE FOR JOB APPLICANTS

Data controller: Mothers' Union

Introduction

As part of any recruitment process, Mothers' Union collects and processes personal information, or personal data, relating to job applicants. This personal information may be held by the Mothers' Union on paper or in electronic format.

Mothers' Union is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information during the recruitment process.

This privacy notice applies to all job applicants, whether the role is applied for directly with us or indirectly through an employment agency and is non-contractual.

Data protection principles

Under the GDPR, there are six data protection principles Mothers' Union must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

What types of personal information do we collect about you?

Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. where all identifying particulars have been removed. There are also "special categories" of personal information and personal information on criminal convictions and offences, which require a higher, level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual's race or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

During the recruitment process, we will collect a range of information about you. This

includes:

- your contact details, including your name, address, telephone number and personal e-mail address;
- personal information included in a CV, any application form, cover letter or interview notes
- references;
- information about your right to work in the UK and copies of proof of right to work documentation;
- copies of qualification certificates;
- information that confirms your identity such as passport, driving licence or another form of personal identity issued by the Government;
- details of your skills, qualifications, experience and work history with previous employers
- your professional memberships;
- information about your right to work in the UK.

We may also collect, use and process the following special categories of your personal information during the recruitment process and for equal opportunities purposes with your explicit consent:

- whether or not you have a disability for which Mothers' Union may need to make reasonable adjustments during the recruitment process;
- information about your race or ethnic origin, religion and sexual orientation;
- information about criminal convictions and offences.

Mothers' Union may process other special categories of data such as information about your religion or belief if a role for which you have applied has an Occupational Requirement for the postholder to be a Christian. There are some roles that require a record check for any criminal convictions and offences. Where we seek this information, it will only be carried to enable us to fulfil our obligations and exercise specific rights in relation to employment. This information will only be collected with your explicit written consent.

How do we collect your personal information?

Mothers' Union collects personal information about you during the recruitment process either directly from you or sometimes from a third party such as an employment agency. If we offer you a job, we may also collect personal information from other external third parties, such as references from current and former employers and criminal record checks from the Disclosure and Barring Service (DBS); depending on the job you have been offered. Other than employment agencies Mothers' Union will only seek personal information from third parties during the recruitment process once an offer of employment has been made to you and we will inform you that we are doing so.

Your personal information may be stored in different places, including on your application record, in the HR management system and in other IT systems, such as the e-mail system.

Why and how do we use your personal information?

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- where we need to do so to take steps at your request prior to entering into a contract

- with you, or to enter into a contract with you;
- where we need to comply with a legal obligation;
- where it is necessary for our legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override our interests.

Our legitimate interests include: pursuing our business by employing employees, workers and contractors; managing the recruitment process; conducting due diligence on prospective staff and performing effective internal administration. The purposes for which we are processing, or will process, your personal information are to:

- manage the recruitment process and assess your suitability for employment or engagement;
- decide to whom to offer a job;
- comply with statutory and/or regulatory requirements and obligations, e.g. checking your right to work in the UK;
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations;
- ensure compliance with your statutory rights;
- ensure effective HR, personnel management and business administration
- monitor equal opportunities;
- enable us to establish, exercise or defend possible legal claims.

We will not use your data for any other purpose other than the recruitment process.

What if you fail to provide personal information?

If you fail to provide certain personal information when requested, we may not be able to process your job application properly or at all, we may not be able to enter into a contract with you, or we may be prevented from complying with our legal obligations. You may also be unable to exercise your statutory rights.

Why and how do we use your sensitive personal information?

We will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences, when the law additionally allows us to.

Some special categories of personal information, i.e. information about your health (if the role you apply for has significant international travel attached to it), and information about criminal convictions and offences, is also processed so that we can perform or exercise our obligations or rights under employment law and in line with our data protection policy.

We may also process information about your health and information about any criminal convictions and offences where we have your explicit written consent. In this case, we will first provide you with full details of the personal information we would like and the reason we need it, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which we are processing, or will process, health information and information about any criminal convictions and offences, are to:

- assess your suitability for employment or engagement;
- comply with statutory and/or regulatory requirements and obligations, e.g. carrying out

- criminal record checks;
- comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations;
- ensure compliance with your statutory rights;
- ensure effective HR, personnel management and business administration;
- monitor equal opportunities.

Change of purpose

We will only use your personal information for the purposes for which we collected it, i.e. for the recruitment process for which you have applied.

However, if your job application is unsuccessful, Mothers' Union will retain your application for six months and it will then be destroyed. We, may, on occasions wish to keep your personal information on file in case there are future suitable employment opportunities with us. We will ask for your consent before we keep your personal information on file for this purpose. Your consent can be withdrawn at any time.

Who has access to your personal information?

Your personal information will be shared internally for the purposes of the recruitment process. This includes members of the HR and the recruitment team and with managers in the department which has the vacancy.

We will not share your personal information with third parties during the recruitment process unless your job application is successful and we make you an offer of employment or engagement. At that stage, we will share your data with those you have confirmed can be contacted for a reference and we may also contact the Disclosure and Barring Service (if it is necessary in the role) to obtain a criminal record check.

How do we protect your personal information?

Mothers' Union has in place measures to protect the security of your personal information. We have internal policies, procedures and controls in place to ensure that your personal information is not lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, who have a business need to know in order to perform their job duties and responsibilities.

Where your personal information is shared with third parties, we only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

How long do we keep your personal information?

Mothers' Union will only retain your personal information for as long as is necessary to fulfil the purposes of the recruitment process. If your application for employment or engagement is unsuccessful, we will hold your personal information for six months after the end of the relevant recruitment process. It will be destroyed after this date.

If you have provided consent for Mothers' Union to keep your personal information on file in case there are future suitable employment opportunities with us, this will be held for an

indefinite period or until you withdraw your consent.

If your application for employment or engagement is successful, personal information gathered during the recruitment process will be retained for the duration of your employment or engagement and in accordance with the privacy notice for employees, workers and contractors.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems.

In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

Your rights in connection with your personal information

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it;
- request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected;
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected;
- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy;
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground;
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact our HR Team in the first instance at jobs@mothersunion.org who will forward your request to our Data Controller Officer. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our HR Team in the first instance at jobs@mothersunion.org

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have

another legal basis for processing.

Changes to this privacy notice

Mothers' Union reserves the right to update or amend this privacy notice at any time. We will issue a new privacy notice when we make significant updates or amendments.

Contact

If you have any questions about this privacy notice or how we handle your personal information, please contact our HR Team at jobs@mothersunion.org

If you believe that Mothers' Union has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.