



HILLINGDON

LONDON

DATA PROTECTION PRIVACY NOTICE FOR HR (Recruitment)

Why are we providing this Notice to you

The Council, in its capacity of Data Controller, holds certain information about you ["personal data"] which it needs to process for the purpose of providing the following service HR (Recruitment). This Notice is designed to give you information about the personal data we hold about you, how we will use it, your rights in relation to it and the safeguards that are in place to protect it.

Further information is contained in the Council's Generic Data Protection Privacy Notice which can be found on its website at www.hillingdon.gov.uk/privacy

What personal data do we hold

We obtain some of this data directly from you and we may also obtain it from other sources. Where this is the case, we will set out in this Notice the identity and the contact details of the relevant data controller and also the contact details of their data protection officer, where applicable. We will also identify from which source the personal data originates, and if applicable, whether it came from publicly accessible sources.

We will also let you know the recipients or categories of recipients of the personal data, if any.

The types of data we hold and process will typically include:

When you create an account:

- name
- email address

When you make an application we may ask for:

- full contact details, including address
- eligibility - nationality and immigration status
- skills, knowledge and experience information
- education and training
- salary information
- qualifications, licences and professional memberships/registration
- diversity and inclusion information (ethnicity, sexuality, gender)
- CV/Work History
- Criminal record declaration

- Information re previous LBH employment
- Information re any relationships with Council employees
- Guaranteed Interview Scheme and reasonable adjustment requirements
- National Insurance number

When you are invited to an interview we may ask you to provide:

- evidence of your identity, right to work in the UK, DBS documents - such as your passport, utility bills or other documentation
- copies of qualifications, professional memberships/registration

When you undergo pre-employment checks we may ask for:

- contact details for your referees
- National Insurance number
- date of birth
- pension history - eg LGPS or other relevant scheme
- proof of continuous service
- health declaration
- DBS information
- qualifications, licences and professional memberships/registration
- bank details for payment purposes
- Emergency contact and next of kin details

The list above only applies for applications made through LBH Jobs system. Some providers/agencies may use their own application systems, where their privacy notice will apply.

When you contact us with feedback or an enquiry we will process:

- your email address
- the details of your request

What is our purpose for processing your personal data

The purposes for which we are processing your personal data are:

- to manage recruitment for LBH, including online application, short-listing, selection, offer and pre-employment checking.
- to enable the creation of user accounts
- to offer a job alert email service
- to provide technical support to candidates and recruiters
- to monitor the effectiveness of recruitment processes - this could include statistical analysis of system usage, or research into the experience of applicants and other system users
- to undertake pre-employment checking and onboarding activity before you start in a role in LBH

- Service delivery and improvement

If we intend to process your personal data for a purpose other than that for which the personal data was collected, we shall provide you details of that other purpose before we start processing your data.

What is the legal basis for our use of your personal data

- Contractual: it is necessary for the performance of a contract to which you are a party - an employment contract
- Contractual: it is necessary in order to take steps at your request prior to entering into a contract for employment
- Legal obligation: it is necessary to comply with a legal obligation placed on us as the data controller - we are required to report on equality of opportunity; and on-boarding processes have specific requirements
- Compliance with a legal obligation: we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency.
- Consent - in some circumstances we may need to ask for your consent to process your personal data in a particular way.

What we do if your personal data is sensitive

Sensitive personal data or special category data is any personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

We will only process your sensitive personal data with your consent, unless we can lawfully process it for another reason permitted by law. We will notify you if it is sensitive and as with non-sensitive personal data, you have the right to withdraw your consent to processing at any time by letting us know. Sensitive data is data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic and biometric data, data concerning health or data concerning a natural persons sex life or sexual orientation.

The use of your sensitive personal data provides recruitment tools and processes that support the London Borough of Hillingdon's recruitment strategy.

The legal basis for processing your sensitive personal data is:

- It is necessary for the purposes of performing or exercising our obligations or rights as the controller, or your obligations or rights as the data subject, under employment law.
- We are required under the Equality Act 2010 to make appropriate reasonable adjustments for candidates with a disability. Processing is of a specific category of personal data and it is necessary for the purposes of identifying or keeping under

review the existence or absence of equality of opportunity or treatment between groups of people specified (in paragraph 8(2) of Part 2 of Schedule 1 to the Data Protection Act 2018) in relation to that category with a view to enabling such equality to be promoted or maintained. Diversity and inclusion data is used anonymously: ethnicity, religion and sexual orientation.

- It is necessary for archiving purposes or statistical purposes and it is in the public interest. Analysis of applications and recruitment outcomes (including online tests), impact on protected groups, timescales for recruitment, and other research may be carried out.

For how long will we hold your personal data

We will only keep your personal data for as long as we need to in order to fulfil the purpose[s] for which it is collected and for so long afterwards as we consider it may be required to deal with any questions or complaints about the service which we provide to you, unless we elect to retain your data for a longer period in order to comply with our legal and regulatory obligations.

Application records and associated files for candidates that become employees (including CVs, letters, emails, comment and feedback) will be held on systems including our data storage system.

Records for candidates who do not reach employment stage, will be automatically deleted after 365 days. The applicant tracking system will send automated emails to these candidates to request consent if they would like their details to be retained longer.

Candidate accounts - you can, at any time, choose to close your account. This will:

- remove your ability to login to the account
- withdraw any active applications
- disable the automatic sending of job alerts

Closed accounts are deleted and cannot be restored, however previously submitted applications will be retained until deletion for the period described above.

Candidate accounts that are active will remain in the system unless the candidate deletes them (or makes a request for deletion). An account will become inactive if the user has not logged in for 365 days.

Organisations that we may share your personal data with

The circumstances in which the Council may do this are set out in the Council's Generic Data Protection Privacy Notice.

Your personal data will be shared by us for HR recruitment purposes with:

Account data:

- our technical supplier Lumesse and their approved staff
- profiles may be shared with departments who have vacancies if you have agreed to be part of our 'talent pool'

Once you have made an application, your information may be shared with:

- approved staff managing vacancies (including recruiters and interview panel members)
- the recruiting departments or profession
- Lumesse
- Assessment testing provider
- LBH managed service providers
- Email survey tools

If you undergo pre-employment checks after successful application, your data may be shared with:

- ReferenceExpert (Great with Talent)
- Capita - Ebulk
- Disclosure and Barring Service
- occupational health providers
- LGPS or other relevant pension provider
- the HR department/recruiting managers
- the recruiting department's shared service provider (if a third party supplier is used)

If you request support with your application or for a technical issue:

- Lumesse
- Online assessment providers

As your personal data will be stored on our IT infrastructure it will also be shared with our data processors who provide email and document management and storage services to us.

What happens if we intend to transfer your personal data to a third country or international organisation

In the exceptional circumstances that this may arise, your consent will be requested.

What happens if you provide personal data to us because of a statutory or contractual requirement

We will let you know of your obligation and also let you know of the possible consequences if you fail to provide it.

What happens if your personal data is subject to automated decision-making including profiling

We will inform you of the existence of this as well as the significance and the envisaged consequences of such processing for yourself.

Your personal data will be subject to automated decision making when online psychometric and ability tests are used.

Some vacancies use online psychometric and ability testing in the early stages of recruitment.

Decisions will be made on whom to invite to later stages based on automated scoring and sifting processes. In addition, test scores and other applicant data are regularly captured for statistical and research analysis purposes.

Your rights

You have a right to access and obtain a copy of the personal data that we hold about you and to ask us to correct your personal data if there are any errors or it is out of date. In some circumstances, you may also have a right to ask us to restrict processing of your data until any errors are corrected, to object to processing or to transfer or in very limited circumstances erase your personal data.

You can obtain further information about these rights from the Information Commissioner's Office at: www.ico.org.uk or via their telephone helpline (0303 123 1113) or in writing:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

If you wish to exercise any of these rights, please contact Mike Talbot (contact details given below). You also have the right to lodge a complaint in relation to this Privacy Notice or our processing activities with the Information Commissioner's Office, which you can do through the website above or their telephone helpline.

We may from time to time ask for further information from you. If you do not provide such information, or ask that the personal data we already hold is deleted or restricted, this may affect the service that we provide to you.

- your personal data is available to view in your online account at any time

- you can request a copy of your personal data, in machine-readable format, by emailing hrresourcing@hillington.gov.uk - this request may take up to four weeks to process.

You have the right to request that any inaccuracies in your personal data are rectified without delay.

- you can edit your contact details via your online account at any time
- in most cases, you will be unable to submit an application if mandatory information is missing
- please check your application carefully before submitting it, as your application will be assessed on the information you provide at that point

You have the right to request that your personal data is erased if there is no longer a justification for it to be processed.

Any applications you have made in the past will be kept for audit purposes.

You have the right in certain circumstances (for example, where accuracy is contested) to request that the processing of your personal data is restricted.

- if your data is restricted from processing, you cannot be considered for a job
- if your request relates to an application/your account, email hrresourcing@hillington.gov.uk

You have the right to object to the processing of your personal data where it is processed for direct marketing purposes.

- your data is not processed for direct marketing purposes

Updates

We may update this notice periodically. Where we do this, we will inform you of the changes and the date on which the changes take effect.

Contacting us

The contact details for Mike Talbot are:

Mike Talbot
HR & OD Service Manager
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge

Statutory Data Protection Officer

You may also contact our Data Protection Officer for further information:

Raj Alagh, Borough Solicitor and Monitoring Officer
Data Protection Officer
Civic Centre
High Street
Uxbridge
UB8 1UW
E-mail: ralagh@hillingdon.gov.uk Telephone: 01895 250617