

# Ely Diocesan Board of Finance Privacy Notice for Job Applicants

Version: 1.0  
Date: 29062018

**Data Controller:** Ely Diocesan Board of Finance of Bishop Woodford House, Barton Road, Ely, CB7 4DX.

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, as prospective employees of our Company, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

## A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

1. processing is fair, lawful and transparent
2. data is collected for specific, explicit, and legitimate purposes
3. data collected is adequate, relevant and limited to what is necessary for the purposes of processing
4. data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
5. data is not kept for longer than is necessary for its given purpose
6. data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures

## B) TYPES OF DATA HELD

We keep several categories of personal data on our prospective employees in order to carry out effective and efficient processes. We keep this data in recruitment files relating to each vacancy and we also hold the data within our computer systems, for example, recruitment logs.

We hold the following types of data, including but not limited to:

- personal details such as name, address, phone numbers;
- name and contact details of your next of kin;
- information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter;
- references from former employers;
- details on your education and employment history etc;
- interview notes if applicable.

We may hold the following types of special categories of data:

- Details of disability to allow reasonable adjustments to be made for you to attend the interview
- Religious beliefs where the role requires it.

Most commonly, we will process special categories of data when the following applies:

1. you have given explicit consent to the processing
2. processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment
3. you have already made the data public
4. processing is carried out in the course of our legitimate activities as a not-for-profit body with a religious aim.

### **C) COLLECTING YOUR DATA**

You provide several pieces of data to us directly during the recruitment exercise.

In some cases, we will collect data about you from third parties, such as employment agencies or former employers when gathering references.

Should you be successful in your job application, we will gather further information from you, for example, your bank details and next of kin details, once your employment begins. At this time you will be provided with a privacy notice for employees.

### **D) PURPOSES OF THE PROCESSING AND LAWFUL BASIS FOR PROCESSING**

The law on data protection allows us to process your data for certain reasons only.

Ely Diocesan Board of Finance will process personal data to take steps at the applicant's request prior to entering into a contract with them. It may also need to process their data to enter into a contract with them.

In some cases, Ely Diocesan Board of Finance will need to process personal data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts with them.

Ely Diocesan Board of Finance is also obliged to seek information about criminal convictions and offences. Where Ely Diocesan Board of Finance seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

### **E) FAILURE TO PROVIDE DATA**

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract of employment with you. This could include being unable to offer you employment, or administer contractual benefits.

### **F) WHO WE SHARE YOUR DATA WITH**

Employees within our company who have responsibility for recruitment will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR. If another church body also has responsibility for the position you have applied for we will also share your personal data with that body as necessary.

We do not share your data with bodies outside of the European Economic Area.

#### **G) PROTECTING YOUR DATA**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

#### **H) RETENTION PERIODS**

We only keep your data for as long as we need it for, which, in relation to unsuccessful candidates, is six months.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable job vacancies, we will keep your data for six months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies and you have provided consent, we will keep your data for nine months once the recruitment exercise ends. 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.

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data and there will be no consequences of withdrawing consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate privacy notice for employees, which will be provided to you.

#### **I) AUTOMATED DECISION MAKING**

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

#### **J) YOUR RIGHTS**

You have the following rights in relation to the personal data we hold on you:

1. the right to be informed about the data we hold on you and what we do with it;
2. the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
3. the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
4. the right to have data deleted in certain circumstances. This is also known as 'erasure';
5. the right to restrict the processing of the data;
6. the right to transfer the data we hold on you to another party. This is also known as 'portability';
7. the right to object to the inclusion of any information;
8. the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data 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 where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact the Data Protection Manager, Sheena Bridgman, on [sheena.bridgman@elydiocese.org](mailto:sheena.bridgman@elydiocese.org) or telephone 01353 652703.

#### **K) MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

#### **L) DATA PROTECTION COMPLIANCE**

Our Data Protection Manager is: Sheena Bridgman

Sheena Bridgman  
[sheena.bridgman@elydiocese.org](mailto:sheena.bridgman@elydiocese.org) or telephone 01353 652703.