

## **Job Applicant Privacy Notice**

### **Data controller:**

Manchester Diocesan Board of Finance  
Church House  
90 Deansgate  
Manchester M3 2GH

### **Data protection officer:**

David Weldon  
Director of Finance and Corporate Services  
0161 828 1423  
[davidweldon@manchester.anglican.org](mailto:davidweldon@manchester.anglican.org)

Manchester Diocesan Board of Finance (MDBF) collects and processes personal data relating to applicants to manage the recruitment process. It is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **The lawful basis on which we process this information**

We collect and use information about applicants in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Employment Rights Act 1996
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 1996
- Article 6 and Article 9 of the GDPR
- Education Act 1996 (where applicable)

### **What information does the MDBF collect from applicants?**

The MDBF collects and processes a range of information from applicants. This includes:

- your name, address, email address, telephone number, date of birth
- details of your qualifications, skills, experience and employment history, including start and end dates with previous employers;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record or DBS clearance;
- information about medical or health conditions, including whether or not you have a disability which may have been provided by you in order for us to be able to make reasonable adjustments at interview;
- equal opportunities monitoring information, including information about your age, gender, ethnic origin, sexual orientation, disability and religion or belief.

The MDBF collects this information in a variety of ways. For example, data is collected through application forms and CVs; obtained from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the MDBF collects personal data about you from third parties, such as references supplied by former employers and information from employment background check providers and information from criminal records checks permitted by law.

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

Where the MDBF processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the MDBF uses for these purposes is anonymised or is collected with the expressed consent of applicants and can be withdrawn at any time. Applicants are entirely free to decide whether or not to provide such data and there are no consequences of choosing to do so.

### **Why does the MDBF process personal data?**

- run recruitment processes;
- seek references from your current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to applicants with disabilities and for health and safety purposes).

### **Storing this information**

We hold applicant data for six months following the date of appointment to the post. The information is stored confidentially and can only be accessed by HR and the recruitment panel.

Should you be successful in your application to join MDBF, your data will be held in accordance with our Employee Privacy Notice, which will be supplied on acceptance of the job offer.

### **Who has access to the data?**

Information provided on your application form will be shared internally with members of the HR team and the recruitment panel.

If you have provided information relating to criminal convictions and/or completed a self-declaration form, this information will only be used by the HR team and the lead recruiter on the panel.

Externally, MDBF shares your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service. Where we engage third parties to process data on our

behalf they are required to verify in writing that they comply with the GDPR regulations and provide information as to how data is processed and stored.

The MDBF will not transfer your data to countries outside the European Economic Area.

### **How does the MDBF protect data?**

The MDBF takes the security of your data seriously. It has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed.

Where the MDBF engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **For how long does the MDBF keep data?**

If your application for employment is unsuccessful, the MDBF will hold your data on file for six months after the end of the relevant recruitment process. If you agree to allow the organisation to keep your personal data on file, the organisation will hold your data on file for a further six months for consideration for future employment opportunities. At the end of that period, or once you withdraw your consent if earlier, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

### **Your rights**

As a data subject, you have the right to:

- access and obtain a copy of your data on request;
- require the MDBF to change incorrect or incomplete data;
- require the MDBF to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the MDBF is relying on its legitimate interests as the legal ground for processing; and
- ask the MDBF to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the MDBF's legitimate grounds for processing data;
- claim compensation for damages caused by a breach of the Data Protection regulations.

If you would like to exercise any of these rights, or make a subject access request, please contact David Weldon, Director of Finance and Corporate Services, who is the Data Controller for MDBF. Contact details are at the top of this notice.

If you believe that the MDBF has not complied with your data protection rights, you can complain to the Information Commissioner at <https://ico.org.uk/make-a-complaint/>

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

### **Automated decision-making**

Employment decisions are not based solely on automated decision-making.