



Loreburn Housing Association

Recruitment Privacy Notice (How we use recruitment information)

This notice explains what information we collect, when we collect it and how we use it. During the course of our activities we will process personal data (which may be held on paper, electronically, or otherwise) about you and we recognise the need to treat it in an appropriate and lawful manner. The purpose of this notice is to make you aware of how we will handle your information.

1. Loreburn Housing Association (“we” or “us”) is committed to a policy of protecting the rights of individuals with respect to the processing of their personal data and adhere to guidelines published in the [Data Protection Act of 1998] and the General Data Protection Regulation (EU) 2016/679 which is applicable from the 25th May 2018, together with any domestic laws subsequently enacted. We collect and use personal data for a variety of reasons.

We are notified as a Data Controller with the Office of the Information Commissioner under registration number Z6168088 and we are the data controller of any personal data that you provide to us.

Our Data Protection Officer is Rebecca Wilson (rebeccaw@loreburn.org.uk 01387 321356).

Any questions relating to this notice and our privacy practices should be sent to rebeccaw@loreburn.org.uk or HumanR@loreburn.org.uk

2. The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so and with whom it may be shared.

3. The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.
4. In either case, the recipient of the information will be bound by confidentiality obligations. We may also be required to disclose personal information to our regulator(s) or as required by law.
5. We process a limited amount of sensitive personal data (known as "special category" data) in relation to your application for employment with us, as outlined by a (*) within the Schedule below. We process this information strictly in accordance with the requirements set out within our Privacy Policy and it is restricted on a need to know basis within the Association. We adhere to the retention periods for such information as set out in that Policy.
6. Your information will only be stored within the UK and EEA.
7. When you give us information we take steps to make sure that your personal information is kept secure and safe. Please refer to our Privacy Policy for further information.
8. We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed. Data retention guidelines on the information we hold is provided in our Privacy Policy.
9. We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the time limits for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed.
10. If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our Employment Privacy Notice.

11. You have the right at any time to:

- Ask for a copy of the information about you held by us in our records;
- Require us to correct any inaccuracies in your information;
- In certain circumstances to object to our processing, ask us to restrict our data processing, or request your personal data to be erased

12. If you would like to find out more about how we use your personal data or want to see a copy of information about you that we hold or wish to exercise any of your above rights, please contact: rebeccaw@loreburn.org.uk 01387 321356 or HumanR@loreburn.org.uk.

You have the right to complain to the Information Commissioner's Office in relation to our use of your information.

The accuracy of your information is important to us – please help us keep our records updated by informing us of any changes to your personal and contact details by updating the HR Portal followed up with an e-mail to HumanR@loreburn.org.uk.

The Schedule
About the information we collect and hold

Part A: Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel, any consultant we may engage or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles[, salary] and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: if you are unsuccessful in your application, your details may be passed on to an associated company to see if they have any suitable vacancies	To see whether an associated company has any suitable vacancies
*Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process and in the regulated sector to comply with our legal obligations to obtain regulatory references.	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel, any consultant we engage and the referee

Part B: Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and any consultant we engage.
Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record) <input type="checkbox"/>	From you and from Disclosure Scotland	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with Disclosure Scotland and other regulatory authorities as required Please refer to our Criminal Records Information Policy for further details.

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/></p>	<p>From you and, where necessary, the Home Office</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>
<p>A copy of your driving licence <input type="checkbox"/></p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To make an informed recruitment decision</p> <p>To ensure that you have a clean driving licence</p> <p>Information may be shared with our insurer</p>
<p>For certain roles (manager level and above) we obtain information from you to allow a background check to be carried out (by Experian)</p> <p>Experian checks may provide us with the following information; authentication of address, voters role confirmation, County Court Judgments, Debt Relief Orders, Trust Deeds or Individual Voluntary Arrangements, declared Bankruptcy and basic criminal record check.</p>	<p>From you to enable the check to be carried out.</p> <p>From Experian</p>	<p>To enter into/perform the employment contract</p> <p>Legitimate interests: to ensure your suitability to work with us</p>	<p>To make an informed recruitment decision</p> <p>We ask you to complete a form which is passed to Experian for the check to be carried out.</p> <p>Information shared with relevant managers, HR personnel and any consultant we engage.</p>
<p>Information about any individual who may be a "connected person" to the Association</p>	<p>From you</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our Entitlements, Payments & Benefits Policy</p> <p>To comply with regulatory requirements and legal obligations</p>	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers, HR personnel and any consultant we engage.</p>

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
For certain roles Psychometric testing may be used as part of the recruitment process.	From you From an assessment centre.	To enter into/perform the employment contract Legitimate interests: to ensure your suitability to work with us	To make an informed recruitment decision Information shared with relevant managers, HR personnel and any consultant we engage.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked "☐" above to us to enable us to verify your right to work and suitability for the position.