

Abri's Job Applicant Privacy Notice

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Abri is committed to protecting your privacy and takes its responsibilities regarding the security of your information very seriously. This Privacy Notice sets out how we will use and protect all information relevant to you, which we collect from you during the course of your application to work for us.

Throughout the rest of this Notice we will refer to you as the 'Applicant'.

We process Applicant information in accordance with relevant data protection and privacy laws (notably the UK General Data Protection Regulation, or 'GDPR' and the Data Protection Act 2018 - which we refer to as data protection law) for two reasons (called 'lawful grounds'): firstly that you have provided us with your consent to do so; and secondly, in emergencies (eg. where emergency services are involved) because it is in the vital interests of our customer.

Who we are

When we say Abri, 'we' or 'us' in this policy, we're generally referring to Abri Group and all the housing providers that make up Abri including Abri Group Limited, and The Swaythling Housing Society Ltd. Under GDPR Abri is the Data Controller of the personal information it holds about job applicants, and where an applicant has applied for a position using the Jobtrain website, Jobtrain is the data processor.

The data we collect

Abri recruits in conjunction with our preferred recruitment partner, Jobtrain and directly on abri.co.uk. When utilising the Jobtrain or Abri website and submitting applicant information, you are agreeing to the use of such data in accordance with this privacy notice.

As defined by the GDPR, Abri is the Data Controller and ultimately responsible for ensuring the data you provide is kept secure, processed correctly and that you understand your legal rights in relation to that data. As part of our Data Controller responsibilities we have an assigned Data Protection Officer.

Our Data Protection Officer can be contacted at abridataprotection@abri.co.uk

Jobtrain ensure generally accepted standards of technological security for the purpose of protecting data provided by visitors to its website from misuse, loss or corruption. Only authorised Jobtrain and Abri personnel have access to personally identifiable data submitted through the website. Such employees are required to maintain the confidentiality of this data.

Jobtrain act as a Data Processor for Abri under the GDPR. They will only process your data in accordance with Abri's instructions.

Abri will only collect from you the following personally identifiable data that is specifically and voluntarily provided by you to us to support your job application, including:

- **Personal Details** – including name, address, D.O.B, marital status and gender;
- **Contact Details** – including personal email addresses and personal telephone numbers;
- **Previous employment details** – including your CV/application form providing previous workplaces, roles and employment history;
- **Experience details** – including your qualifications, skills, experience, professional body memberships and accreditations;
- **Remuneration details** – including current salary level and benefit entitlements;
- **Job-related details** – including responses to behavioural or technical related questions; and
- **Eligibility to work details** – including your proof that you are eligible to work in the UK which could include passport or other documentation.

In collecting this information we rely on the legal basis of legitimate interests. We may sometimes collect additional information from third parties or externally hosted sources, including: former employers or any referees you direct us to: the Disclosure and Barring Service; door entry systems; swipe card systems; CCTV; access control systems; remote access systems; video conferencing and communication or collaboration platforms that may be used in the interviewing process .

Some of the information which we will collect may be special categories of personal data (also referred to as sensitive personal data). This may include:

- Information about your **race, ethnicity, religious belief and sexual orientation** which we monitor for purposes of diversity and inclusion;
- **Criminal records history** - including whether you have any unspent criminal convictions, reprimands or cautions if the role requires a DBS check; and
- **Health details** - including whether or not you consider yourself to have a disability or impairment for which the organisation needs to make reasonable adjustments during the recruitment process.

We will only use your sensitive data in the following ways and based on the following lawful basis:

- We will consider whether we need to provide appropriate disability adjustments during the recruitment process, to comply with our legal obligations as an employer and where it is needed in the public interest (such as equal opportunities monitoring) and
- We will use information about your race or national or ethnic origin, religious beliefs and sexual orientation to ensure meaningful diversity and inclusion monitoring and reporting, in accordance with our public sector

equality duty under the Equality Act 2010 and in accordance with substantial public interest.

- We will use information about any unspent criminal convictions to determine your suitability for certain roles, bearing in mind our duty to safeguard vulnerable customers and to ensure high levels of proven trustworthiness for roles of a fiduciary nature, in accordance with substantial public interest.

Where we collect this data from

Abri collects this data from a variety of sources including through the application process, CVs, from identity documents such as passports or collected through assessments such as interviews.

Abri may also collect personal data about you from third parties such as recruitment partners/agencies, former employers/referees and the Disclosure and Barring Service. Abri will only seek references once a job offer has been made.

Where we will store this data

Data will be stored in secure systems which include the following:

- Abri's server
- Abri's HR systems
- Jobtrain's IT systems

How long will we hold your data

We will only retain your information for as long as is necessary to fulfil the purposes set out in the Privacy Notice.

Initial applications submitted via abri.co.uk will be stored on Abri's server for a maximum of 2 weeks and 30 minutes.

Interview and assessment records for unsuccessful applicants will be retained for a maximum period of one year after the vacancy has closed.

Records for successful applicants will be transferred to their personal file and a separate privacy notice will then apply to their data as an Abri colleague.

Your candidate account will be deactivated after 12 months of inactivity. You can deactivate your account at any time. At the same time as this, your data will be fully anonymised.

Back-Ups

All our data is backed up regularly as part of our measures to ensure compliance with your right to have your data kept secure and protected against any threat to its integrity. Data held in our back-ups may exceed the retention period set for the same data when it is part of our live systems. This is because our back-ups are kept for 7 years, no matter what the particular retention period applicable to individual records held within them. However, acting in accordance with ICO advice, we believe that these comply with our legal obligations towards our customers because:

- while held as back-up this data is deemed 'beyond use'; and

- if the back-up files are ever restored to live systems (eg. in the case of a cyber incident affecting the integrity of our live records) we will undertake sanitization of the restored data to delete from it any data which is either beyond its retention period, or should be deleted because it formed part of a job applicant record that was erased under the data subject's's right of erasure (see below).

Why we need this data

Abri needs to process the types of data listed above for a variety of purposes for which we have a 'lawful basis'. This data enables Abri to:

- Assess your skills, qualification and suitability to the role you have applied for;
- Communicate with you during the recruitment process;
- Keep records of our hiring processes;
- Carry out our obligations and exercise specific rights in relation to employment including carrying out statistical analysis; and
- Comply with our legal obligations such as to prevent fraud.

Abri will always comply with data protection law. We will ensure the data we hold about you will be:

- Used lawfully, fairly and transparently;
- Collected only for, and relevant to the purposes explained to you;
- Accurate and kept up to date;
- Kept only for as long as required; and
- Kept securely.

Who we share your data with & why

Your data will be shared internally for the purposes of the fair and legally compliant recruitment process outlined. This includes making it accessible to HR, our recruitment partners, managers involved in the recruitment process, and IT staff if access to the data is necessary for the performance of their roles.

Abri will not share your data with third parties unless your application is successful and results in an offer of employment. The organisation may then share your data with former employers/nominated referees in order to obtain references. In addition, we verify data with the Disclosure and Barring Service to obtain necessary criminal records checks where appropriate for the role.

Jobtrain and Abri will not share data with third parties for secondary or unrelated purposes unless otherwise disclosed at the point of collection and not without having gained consent to this at the point of collection.

How will we secure your data?

Abri takes the security of your data seriously. It has policies and procedures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Jobtrain have in place reasonable commercial standards of technology and operational security along with internal policies and procedures to protect all data

provided by visitors to its website and applicants from loss, misuse, alteration or destruction.

Your rights and how you can access the data we hold about you

Abri and Jobtrain are dedicated to providing reasonable access to applicants who wish to review the personal data retained when they apply via the Jobtrain website and correct any inaccuracies it may contain. Applicants who choose to register may access their profile, correct and update their details, or withdraw their details at any time by accessing their personal profile using their secure login. In all cases, Abri will treat requests to access data or change data in accordance with applicable legal requirements and will meet the deadline for doing so - 30 days from the date of the request.

You have the following rights in relation to the way your personal data is handled:

- the right of erasure, or to be forgotten (but please note the explanation re back-ups)
- the right to rectification if data is inaccurate or out of date
- the right of data portability (to obtain and reuse your personal data)
- the right to object, in certain cases, to Abri's handling of your personal data
- the right to withdraw your consent with regards to the handling of your personal data
- you have the right to ask for a copy of the data we hold about you (Subject Access Request)
- You have the right to lodge a complaint with a supervisory authority - the ICO

Where you exercise your right to object or withdraw your consent we may process your personal data without your knowledge or consent where we are permitted or required by law or regulatory requirements to do so. In such a case, we will not process more personal data than is required under the circumstances.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Jobtrain or Abri during the recruitment process. However, if you do not provide the information requested during the process, it may not be able to process your application properly or at all.

Changes to our Privacy Notice

We reserve the right to modify or amend this privacy notice at any time and for any reason, providing it maintains compliance with the UK General Data Protection Regulation 2020 and the Data Protection Act 2018.

If you would like to exercise any of your rights, you can contact our Data Protection Officer at abridataprotection@abri.co.uk

If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner (www.ico.org.uk).

By ticking the box and continuing with your application, you are agreeing to the terms in this privacy