

**Recruitment and Selection Privacy Statement**

The following explains how we Citizen Housing Group Ltd (data controller) intend to use the information you provide in your application, along with your rights, our reasons for requesting it and who will have access to it.

This privacy notice relates to information we collect for staff and contractor recruitment (Page 1) and board and committee recruitment (Page 3)

**Staff and contractor recruitment**

**For what purpose do we collect your personal information?**

Entering into a contract for prospective employment purposes and a selection assessment of your suitability for employment.

**What information do we collect from you?**

We collect information that is specifically provided by you as part of an application process. We will collect the following (but not limited to):

* Name, address, email, telephone number
* CV (if applicable)
* Equal opportunities monitoring information (defined as special categories data) - this information is purely for statistical analysis and monitoring purposes
* Answers to application questions
* Any other information you wish to provide in support of your application

By agreeing to this privacy statement, you are allowing us to form a contract that will mean we can use your details and information presented so that we can assess your suitability for employment with us and carry out our statistical analysis.

**Why do we collect this information and who do we share it with?**

Details you provide in this application will be:

* held on our computer systems and may be downloaded by us
* used to deal with your application
* made available to us and our processors
* used for communication with you regarding the vacancy
* used to satisfy legal requirements
* used for statistical analysis
* held and may be used to contact you about other vacancies

We use some automated screening tools as part of this application process. The answers you provide to one or more of the questions (excluding any special categories/equal opportunity questions) may result in your application being automatically declined. This technology is used to help us manage the high volume of applications we receive and can assure applicants the same outcome would occur if we manually reviewed your application. The reason for the decline will be made available to you in your candidate account.

References - Our recruitment process requires that we contact the referees provided by you as part of our checks to ascertain suitability of employment. The content of the reference will not be shared without the referee's permission.

**For how long does Citizen keep data?**

We will store your application data for 12 months from this date. After this period, it will be fully deleted.

**Your rights**

We are dedicated to providing reasonable access to visitors who wish to review the personal information retained when they apply via our website and correct any inaccuracies it may contain. If you choose to register, you may access your profile, correct and update your details, or withdraw your details at any time. To do this, you can access your personal profile by using the secure login. In all cases we will treat requests to access information or change information in accordance with applicable legal requirements.

You have the following rights in relation to the way in which we deal with your personal data:

* the right of erasure or to be forgotten
* the right to rectification if information is inaccurate or out of date
* the right of data portability (to obtain and reuse your personal data)
* the right to object to Citizen (data controller) and and our external data processor 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 information we hold about you (Data Subject Access Request – DSAR)
* You have the right to lodge a complaint with a supervisory authority - the ICO

Within your candidate account, you can also use the Download Data feature to generate an XML file of the current data we hold on you that you have provided and/or have access to within the account.

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.

To exercise any of the above rights please contact Citizens Data Protection Officer (Mr Shane Murphy) on the address below. Overall responsibility for management of your data resides with Citizens senior information risk owner (Mr Ian Tinsley) at Citizen Housing Group Ltd, 4040, Solihull Parkway, Birmingham Business Park, Birmingham, B37 7YN or dataprotection@citizenhousing.org.uk

If you are not satisfied by our actions, you can seek recourse through our internal complaints’ procedure. If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner (www.ico.org.uk) or seek recourse through the courts.

**How do we keep your data safe?**

Citizen takes the security of your data seriously. The organisation has internal policies and controls in place to safeguard that your data is not lost, accidently destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Our Data protection policy and procedures are available on our intranet One Place. Where the organisation engages contracted 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.

**Board and Committee Recruitment**

**What information we collect**

When you apply for a Board, Committee or Advisory Group role, we collect and process personal data such as:

* Your name, contact details and CV;
* Declaration of interest, references, skills assessments and eligibility checks;
* Interview notes and scoring information;
* Equal opportunities data (if you choose to provide it);
* For certain roles, results of DBS or similar vetting checks.

**Why we collect your information**

We process this information to:

* Assess your suitability for appointment;
* Comply with legal and regulatory duties (e.g. fit and proper person checks, governance reporting);
* Maintain an audit trail of our appointment decisions;
* Ensure diversity, fairness, transparency and accountability in recruitment.

Our lawful bases for processing are:

* Article 6 (1)(b) – Steps prior to entering into a contract
* Article 6 (1)(c) – Legal obligation
* Article 6 (1)(f) – Legitimate interests in relation to good governance.

For special category data we rely upon:

* Article 9(2)(b) and (g) – Employment/Social protection and substantial public interest.

**Who we share your data with**

We may share the minimum necessary candidate data when appropriate with:

* Board or committee members involved in the selection process;
* External assessors or recruitment consultants (under Data Processing/Sharing or Confidentiality Agreements);
* Regulators (e.g. the Regulator of Social Housing where required);
* DBS or background check providers for vetting purposes.

We do not share you information with third parties for marketing purposes.

**How long we keep your data**

We only keep personal data for as long as necessary for governance and recruitment purposes.

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| --- | --- |
| Candidate status | Retention period |
| Unsuccessful applicants | 6 months after notification (upto 12 months if required for audit or potential challenge) |
| Successful applicants | Duration of service plus 6 years – Limitation Act 1980 |
| Appointment and governance records | Upto 10 years (or permanently, where required for historical or legal reasons) |
| Equal opportunities data | 12 months then anonymised |
| DBS vetting results | Summary only, retained for 6 months |

After these periods, your data will be securely deleted.

**Your rights**

You have the right to:

* Access your personal data;
* Request correction or erasure;
* Object to or restrict processing;

Complain to the Information Commissioner’s Office (ICO) if you believe we have not complied with data protection law.

You can contact the ICO at [www.ico.org.uk](http://www.ico.org.uk) or on 0303 123 1113.

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We may update this privacy notice from time to time. The latest version will always be available on our website.