

EDINBURGH DOG AND CAT HOME PRIVACY NOTICE

RECRUITMENT

Introduction

Edinburgh Dog and Cat Home (the Home) is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

The Home respects your personal information and undertakes to comply with all applicable data protection legislation currently in force. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The Home may use personal information provided by you during the recruitment process either with your consent or on the basis of the following:

- 1. Contract:** the processing is necessary for a contract we have with you
- 2. Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations)
- 3. Vital interests:** the processing is necessary to protect someone’s life
- 4. Public task:** the processing is necessary for us to perform a task in the public interest or for official functions, and the task or function has a clear basis in law

- 5. Legitimate interests:** the processing is necessary for our or your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests

Except as provided under these terms, the Home will not disclose your personal information without your permission unless such disclosure is required by law or other court order.

The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, professional registrations, employment history, current salary, qualifications.
- Any information you provide to us during an interview.
- Driving licence details.
- The information gathered from social media searches.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Disclosure Scotland or the Disclosure & Barring Service in respect of criminal convictions.
- Your named referees.
- Social media searches from publicly accessible sources.

How information about you will be used

The Home collects information about you. This is to:

1. Ensure that we can verify your identity

2. Assess your skills, qualifications and suitability for the role
3. Ensure that we can verify information provided by you during the recruitment process including, but not limited to, your employment history and qualifications
4. Communicate with you about the recruitment process
5. Keep records related to our hiring processes
6. Gather information regarding any disability you suffer from in order that we can make reasonable adjustments during the recruitment process (where applicable)
7. Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you since it would be beneficial to our business to appoint someone to that role or to work for us.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are [required **OR** entitled] to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- [We are legally required [by [REGULATORY BODY]] to carry out criminal record checks for those carrying out [role OR work].]

- [The role of [SPECIFY] is one which is [listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023)] [and is also specified in the Police Act 1997 (Criminal Records) Regulations (SI 2002/233)] so is eligible for a [standard OR enhanced] check from Disclosure Scotland.
- [The role of [SPECIFY] requires a high degree of trust and integrity [since it involves dealing with [SPECIFY] [for example, high value client money]] and so we would like to ask you to seek a basic disclosure of your criminal records history.]

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with third parties for the purposes of processing your application: for example, training bodies/governing bodies to verify declared qualifications/registrations.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to work for us. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.

In the event that you are successful in the role, the Home will retain all of the above information as part of your personnel file and a separate privacy notice will be issued to you on commencement of employment which will detail the information we hold on you, who it is shared with, the legal basis for processing your information and our data retention periods which are greater than those specified above.

Your rights in connection with personal information

- You are entitled to request a copy of the information which the Home holds about you.
- If you become aware that the personal information the Home holds about you is inaccurate, you may request that it is amended.
- You have the right to request erasure of your personal information where there is no good reason for the Home continuing to process it or where you have exercised your right to object to processing (see below).
- You can object to processing of your personal information where the Home is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where the Home is processing your personal information for direct marketing purposes.
- You are entitled to request the restriction of processing of your personal information. This enables you to ask the Home to suspend the processing of personal information about you, for example if you want the Home to establish its accuracy or the reason for processing it.
- You can request the transfer of your personal information to another party.

Any requests in this respect or any other correspondence relating to the personal data we hold about you should be made to the Home's Data Protection Officer, or Zuzana Beak, Senior HR Officer.

Where processing is based upon consent, you have the right to withdraw consent at any time which will not affect the lawfulness of processing based on consent before its withdrawal.

The Home's Data Protection Officer is Kevin McLean, kevin@edch.org.uk, 0131 669 5331 who will monitor GDPR compliance within the organisation and advise the organisation of their obligations. If you have any concerns or need further information then please contact the Data Protection Officer.

The Home will not use the information supplied by you during the recruitment process for any other purpose other than recruitment for the role which you have applied.

The Supervisory authority in the UK & NI is the ICO/in the Republic of Ireland is the Data Protection Commission. Where you have a complaint regarding the handling of your data which you do not think can be handled internally, then you have the right to make a complaint to the ICO/Data Protection Commission.