



## **PRIVACY NOTICE FOR THE DIOCESE OF DOWN AND CONNOR**

### **WHAT IS THE PURPOSE OF THIS DOCUMENT?**

The Down and Connor Diocesan Trust (which we refer to as "the Diocese" in this notice) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You have received 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) (which we refer to as "GDPR" in this notice).

### **DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles, which 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; and
- Kept securely.

### **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 on our application form and/or curriculum vitae and covering letter (if applicable), including name, title, address, telephone number, personal email address, date of birth, gender, employment history, education, qualifications and experience.
- Any information you provide to us during an interview, and any tests that may form part of the process.

We may also collect, store and use the following types 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.
- Any recruitment agency involved in your recruitment, from which we collect the following categories of data: your application form, your curriculum vitae, your contact details and/or equal opportunity monitoring forms.
- Access NI, from which we collect the following categories of data: a criminal record status and/or information held by the police that is relevant and ought to be disclosed but does not form part of the criminal record.
- Your named referees, from whom we collect the following categories of data: references containing details of previous employment history if you are successful.

## **HOW WE WILL USE INFORMATION ABOUT YOU**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

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

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

Having received your application form and/or curriculum vitae (if applicable), we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role.

If we decide to offer you the role, if applicable, we will then take up references and carry out a criminal record check before confirming your appointment.

### **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 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**

If applicable, 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 entitled to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. 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 we share your personal information with third parties?**

We will only share your personal information with third parties set out below for the purposes of processing your application. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may share information relevant to any request by you for adjustments to the recruitment process as a result of an underlying medical condition or disability with medical / occupational health professionals to enable us to identify what, if any, adjustments are needed in the recruitment process and, if you are successful, once you start work. Our legal basis for sharing this information is that it is necessary for entry into a contract; it is in our legitimate interest to

consider adjustments to enable job applicants to participate fully in the recruitment process and it is necessary to comply with our legal obligations.

We may share your personal data that is relevant, where appropriate, with our legal and other professional advisers, in order to obtain legal or other professional advice about matters related to you or in the course of dealing with legal disputes with you or other job applicants. Our legal grounds for sharing this personal data are that it is in our legitimate interests to seek advice to clarify our rights and obligations and appropriately defend ourselves from potential claims; it is necessary to comply with our legal obligations / exercise legal rights in the field of employment and it is necessary to establish, exercise or defend legal claims.

We may share your right to work documentation with the Home Office, where necessary, to enable us to verify your right to work in the UK. Our legal ground for sharing this personal data is to comply with our legal obligation not to employ someone who does not have the right to work in the UK.

## **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. Details of these measures may be obtained from the DPO, whose contact details are set out below.

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 we use your information for?**

We will retain your personal information for a period of 12 months after we have communicated to you our decision about whether to appoint you to the role. 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 our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right:

- to be informed that your information is being processed and to request a copy of the information we hold about you;
- to request that your personal information is rectified if it is out of date or inaccurate;

- where there is a dispute in relation to the accuracy or processing of your personal information, to request a restriction is placed on further processing;
- to request your personal data is erased where there is no compelling reason for us to continue to process the information;
- if we are relying on your consent to process Personal Data, the right to withdraw your consent to the processing at any time;
- to object to the processing of personal data where we are 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; and
- to request the transfer of your personal information to another party.

If you want to review, verify, correct, or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [Civil Administrator] in writing.

## **RIGHT TO WITHDRAW CONSENT**

In applying for this role, you may provide your consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the DPO. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

## **DATA PROTECTION OFFICER**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at [dataprotection@downandconnor.org](mailto:dataprotection@downandconnor.org) or 028 9077 6185. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Issued:	28 <sup>th</sup> August 2018
Updated:	29 <sup>th</sup> March 2021