



# JOB APPLICANT PRIVACY NOTICE

Also known as Fair Processing Notice (FPN)

This notice is to fulfil our duties under the General Data Protection Regulation to you concerning your personal information.

## Summary

As part of our recruitment process, North Wales Housing (NWH) collects and processes personal data relating to job applicants. Personal data is any data or information from which an individual can be identified or data which when mixed with other information held about the same individual would make it obvious as to who the subject of the data is. NWH is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We are a Registered Social Landlord (RSL) regulated by the Welsh Government.

### Normal activities can be summarised as:

1. Providing social and other types of housing.
2. Property and grounds maintenance and repair.
3. Managing your housing, tenancy/lease and account as your landlord.

### We also provide additional optional services including

4. Organising and assisting community events.
5. Offering opportunities to be involved.
6. Providing welfare and benefits advice.
7. Adaptations made to the properties we manage.



8. Selling properties.
9. Support to Service Users

## Vision and Values

### Vision

To be the housing provider of choice in North Wales.

### Values

Our values and standards are what make us North Wales Housing. They are what we stand for. All our people work to these values that collectively sum up the character of the organisation. Our values drive our decision making on a daily basis and the way we act will embody our values

- **Open...** we are transparent in the way we work and make decisions.
- **Trust...** we do what we say we will do. We behave with honesty and integrity.
- **Responsive...**to our customers, staff and partners needs and aspirations
- **Fairness...** we're open to all, but closed to prejudice. We will actively promote equity and respect diversity.
- **Learning...**we look for better ways in the future. We acknowledge when we make mistakes and learn from them. We look outward to learn from others.

### Who we are

North Wales Housing is the 'Data Controller' of the personal data you provide to us.

North Wales Housing's registration number **Z5865343** and our registered address is:

North Wales Housing  
Plas Blodwel , Broad Street  
Llandudno Junction  
Conwy, North Wales  
LL31 9HL



## **A bit about us**

Our tenants are put at the heart of everything that we do, having recently developed a Tenant Participation Strategy that expands our approach to engagement to ensure that all customers have access to an appropriate level of involvement.

Most housing records we hold electronically, with some on paper. We have a legal duty and are committed to keeping these confidential, accurate and secure at all times in line with Data Protection legislation.

## **How we collect your information & what information we collect about you**

For recruitment purposes, the information North Wales Housing require from you or will collect about you includes:

### **Personal Information**

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements; and
- information about your entitlement to work in the UK;

### **Special categories of personal data**

- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

NWH may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity



documents, or collected through interviews or other forms of assessment, including online tests.

NWH may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. NWH will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

You may refuse to provide information if you deem any requests as inappropriate, although this might impact on our ability to complete the recruitment process.

### **Why does the organisation process personal data?**

NWH needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you. In some cases, NWH needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

NWH has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. NWH may also need to process data from job applicants to respond to and defend against legal claims.

### **Why does the organisation process special categories of personal data?**

NWH may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where NWH processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.



For some roles, NWH is obliged to seek information about criminal convictions and offences. Where the organisation seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the People Team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

NWH may also need to share your data with certain external third parties including:

- Companies who provide candidate interview and assessment services to NWH
- Suppliers who undertake background screening on behalf of NWH (credit checking agencies, criminal checking bureaus, etc.)
- Academic institutions (Universities, colleges etc.) in validating information you have provided; and
- Other third-party suppliers (or potential suppliers) who provide services on our behalf)

In some cases we may have a duty to disclose your information by law to:

- Our partner organisations whose purposes are compatible to ours
- Local Authorities, regulators and government departments
- Police, fire services or the health authority or medical staff
- Others who may need information from us for their own purposes (for crime prevention or detection, for the prevention and detection of fraud.

NWH will not sell your data to third parties.

NWH will not transfer your data outside the European Economic Area.

North Wales Housing operates a range of information and communications systems and technologies for efficient operation of the business. Personal information is stored and



managed within those systems which are maintained to achieve a high level of confidentiality including following best practice cyber security standards.

We hold information in IT systems which may be copied for testing, backup, archiving and disaster recovery purposes.

Further details including details of third party sharing can be found in the Customer Privacy Policy.

### **How does the organisation protect data?**

NWH takes the security of your data seriously. It has internal policies and controls 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.

NWH also employ someone who is responsible for managing information and its confidentiality to ensure:

- Your information is protected; and
- Inform you how it will be used.

All staff are required to undertake training on a regular basis. Comprehensive training is required to help protect the information that has been given to the NWH. The training makes sure that all staff working at NWH are aware of their responsibilities about the handling of your information regardless of the department that they work in.

### **For how long does the organisation keep data?**

Once the recruitment process is complete, North Wales Housing will hold your data as follows:

If your application for employment is unsuccessful and your Application form is non-shortlisted, the organisation will hold your data on file for a period of six months after notification (as recommended by the Commission for Racial Equality and Equal Opportunities).

If your application for employment is unsuccessful and you are shortlisted, this includes interview notes and related application forms, this information will be retained for 1 year after notification.



You may be asked when you submit your CV whether you give us consent to hold your details in order to be considered for other positions.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained in accordance with our Appendix 1 of our Document and Data Retention Policy. The periods for which your data will be held will be provided to you in our Employee Privacy Notice.

Further details of our retention information is available upon request.

## **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact NWH's Data Protection Officer (Gareth Roberts) on 01492 573207 or via email [Gareth.roberts@nwha.org.uk](mailto:Gareth.roberts@nwha.org.uk) .

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

It is your responsibility to keep your personal data up to date so that accurate application records can be maintained. If you need to make any changes to your personal data once you have submitted your application you should contact the People Team.

### **In some cases we may have a duty to disclose your information by law to:**

- Our partner organisations whose purposes are compatible to ours
- Other housing associations



- Local Authorities, regulators and government departments
- Police, fire services or the health authority or medical staff
- Others who may need information from us for their own purposes (for crime prevention or detection, for the prevention and detection of fraud.

All personal data North Wales Housing collect and hold about you will be processed by our staff in the United Kingdom and no third parties will have access to your personal data unless there is a legal obligation for us to provide them with this.

Please be aware, however, that your information may be stored on a cloud-based system whose servers are located within the European Union.

### **What we will not do**

We will not send you unsolicited marketing material.

We will not sell your personal data on to third parties.

We will not pass on your personal data to unrelated third parties unless we are allowed or required to do so by law or we have your explicit permission to do that.

### **What if you do not provide personal data?**

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

### **I applied to North Wales Housing for a job. Can I Change My Mind?**

North Wales Housings needs your consent to collect your data. If you want to change your mind and withdraw your application, you can do this at any time but this does mean you won't be able to apply for the vacancy in question.

To cancel your application, please contact: -

#### **People Office**

**Plas Blodwel, Broad Street,**



**Llandudno Junction  
Conwy, North Wales,  
LL31 9HL.**

View Map

Phone: 01492 563226

Email: [people.office@nwha.org.uk](mailto:people.office@nwha.org.uk)

## **Your rights, the right to complain and the ICO**

You have the right to request a copy of the data we hold about you.

You have the right to complain about any matter relating to our service, including how we use your personal data:

In the first instance, please contact Lynne Williams, Head of People, on the contact details provided above.

If you wish to make a complaint, raise a concern or ask a question about your personal information, you can do so by contacting the Data Protection Officer on: 01492 573207 or via e-mail [Gareth.roberts@nwha.org.uk](mailto:Gareth.roberts@nwha.org.uk) .

If you are still not happy with our service you may complain to the Public Services

Ombudsman Service at <http://www.housing-ombudsman.org.uk/> .

If you wish to complain about our use of your personal data you may complain to the UK

Information Commissioner's Office (ICO) at:

**The Information Commissioner**

**Wycliffe House**

**Water Lane**

**Wilmslow**

**Cheshire**

**SK9 5AF**

Tel: 0303 123 1113 / Fax: 01625 524 510



Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Website: <https://ico.org.uk/>

'Live Chat' is available on the ICO website: [ICO live chat](#)

## **Changes to our Job Applicant Privacy Notice**

Our Job Applicant Privacy Notice is regularly kept up to date and this version was updated on **24<sup>th</sup> July 2018**. The latest full version is always available from our website at <https://www.nwha.org.uk> .