



# JOB APPLICANT PRIVACY NOTICE

## Also known as Fair Processing Notice (FPN)

This notice is to fulfil our duties under the UK General Data Protection Regulation (GDPR)<sup>1</sup> to you concerning your personal data and in accordance with our GDPR and Data Protection Policy and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR).

## 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.

North Wales Housing is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

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

This notice applies to Job Applicants (including permanent, temporary, and voluntary).

**It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.**

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

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

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<sup>1</sup> UK GDPR means the GDPR as transposed into United Kingdom national law by operation of section 3 of the European Union (Withdrawal) Act 2018, together with the Data Protection Act 2018, and other data protection or privacy legislation in force from time to time in the United Kingdom.

There is also the overarching principle of 'accountability' and North Wales Housing acknowledge and take its responsibilities and your rights seriously.

## **Vision and Values**

### **Vision**

To make a difference to people's lives, by providing homes to be proud of and creating communities in which they can thrive.

### **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.

## **Registration details**

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

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

NWH collect personal data about you for recruitment purposes, this based on your consent for us to process this data.

Where additional information is required subject to offer, for example, NWH may rely on a different lawful basis for processing your personal data. Privacy information about this processing is contained within GDPR Privacy notice for employees, workers and contractors.

The information North Wales Housing require from you for recruitment purposes is as follows:

### **Personal Data**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

### **Personal data collected**

- 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**

There are "special categories" of more sensitive personal data which require a higher level of protection.

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

### **Methods of Data Collection**

NWH Group collect information in a variety of ways, through:

- Our Applicant Tracking System (on People HR)
- Covering Letter
- Application Forms
- CVs
- Correspondence
- Interviews
- Assessments
- Online Tests
- References and
- DBS Background Checks (where applicable)

Data will be stored securely and in accordance with our GDPR and Data Protection Policy. This will include systems such as Office 365, People HR and the JVP Group recruitment platform.

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 we collect equality and diversity information (race, ethnic origin, religious/philosophical beliefs, disability data and sexual orientation), we rely on Schedule 1 Part 2 (8) of the Data Protection Act 2018 (Equality of opportunity or treatment) as this type of data is used in reporting to Welsh Government and feeding in to the regional strategic approach to promoting equality and diversity through sharing reporting data with the North Wales Registered Social Landlords Equality Partnership (NWREP).

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.

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

- 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 who provide services on our behalf.

### **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.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your People file and retained in accordance with our Document and Data Retention Policy. The periods for which your data will be held will be provided to you in our GDPR Privacy notice for employees, workers and contractors.

If you have subscribed to our contact list, we will keep your contact details until you no longer have any interest in receiving the correspondence or if you have been successful in obtaining work with us.

Further details of our retention information is available upon request.

**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.

**What we will not do**

We will not:

- send you unsolicited marketing material
- sell your personal data on to third parties
- pass on your personal data to unrelated third parties unless we are allowed/ required to do so by law or have your consent to do so

**Prospective Applicants and ‘Marketing Communications’ about vacancies**

Where you have expressed an interest in working for us, we will maintain a contact list to notify you of prospective job opportunities, careers fairs and current vacancies.

We send Marketing Communications to you via email and text with your consent, you can contact us to withdraw your consent at any time.

There is no intention of marketing third party products or services to you.

**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.**

Phone: 01492 563226

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

<https://www.nwha.org.uk/>

### **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.

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.

### **Data Protection Officer (DPO)**

Our DPO will oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact [gareth.roberts@nwha.org.uk](mailto:gareth.roberts@nwha.org.uk) .

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.

### **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](#)

## **Review and Changes to this Privacy Notice**

North Wales Housing's Privacy Notice is regularly kept up to date with changes in the law and will be reviewed annually. This version was updated on **8 December 2023**.

The latest full version will be available on our website at <https://www.nwha.org.uk/about-us/data-protection/>.

### Document Control

<b>Organisation</b>	North Wales Housing
<b>Title/Filename</b>	NWH Privacy Notice
<b>Author</b>	Data Protection Officer
<b>Owner</b>	Finance & Resources Director
<b>Last Review</b>	08/12/2023

### Changes/Review Log

<b>Date</b>	<b>Description</b>	<b>Change by</b>	<b>Reviewed by</b>
08/12/2023	V5 – removed reference to JVP. We no longer use this organisation for outsource of recruitment, including application filtering and pre-screening	People Partner	Data Protection Officer.