



Fairfield Trust

Job Applicant - Privacy Policy

Fairfield Trust takes data privacy seriously. We recognise and value the trust that individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from job applicants and volunteers.

1. **What is this document and why should you read it?**

- 1.1 This privacy notice explains how and why Fairfield Trust (also referred to in this notice as **"we"**, **"our"** and **"us"**) uses personal data about applicants (referred to as **"you"**).
- 1.2 You should read this notice, so you know what we are doing with your personal data.
- 1.3 This notice does not form part of any other contract between us and you.

2. **Fairfield Trust's data protection responsibilities**

- 2.1 **"Personal data"** is any information that relates to an identifiable natural person. Your name, address, contact details and CV are all examples of your personal data, if they identify you.
- 2.2 The term **"process"** means any activity relating to personal data, including, by way of example, collection, storage, use, consultation, and transmission.
- 2.3 Fairfield Trust is a **"controller"** of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data, and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- 2.4 You also have responsibilities whenever you process personal data in connection with the performance of your role at Fairfield Trust; these are outlined in our Data Protection Policy.

3. **What types of personal data do we collect and where do we get it from?**

- 3.1 We collect many different types of personal data about you for lots of reasons (which are described below).
- 3.2 You provide us with a range of personal data when you apply for a job or apply to volunteer with us. You may also apply for a work experience placement, and you will be asked to provide some personal data via the applicable application form. We also obtain some personal data from other sources and create some personal data ourselves. I.E through interviews or other forms of recruitment assessments.
- 3.3 After the shortlisting stage, the organisation will undertake an online search on shortlisted candidates as part of our safeguarding due diligence. Online searches are undertaken to identify any incidents or issues that are available publicly online, and which may call into question a candidate's suitability to work with vulnerable young people.
- 3.4 The organisation may also collect data from external parties such as references supplied by former employers and information from employment background check providers.
- 3.5 Candidates who attend interview will be asked to supply 3 x forms of original identification for a DBS check and copies will be taken and securely stored. Identification for unsuccessful candidates will be destroyed immediately.
- 3.6 Where we do not need your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.

- 3.7 We may process special category data such as ethnicity, sexual orientation, or religion to monitor recruitment statistics for equality monitoring purposes. We also collect information about applicant's disabilities to ensure we carry out our obligations in relation to employment and reasonable adjustments during the interview process.
- 3.8 Further details of the personal data we collect and where we get it from are set out at [Schedule 1](#).
4. **What do we do with your personal data, who we share it with and why?**
5. Processing data and keeping records from job applications and recruitment campaigns allows the organisation to deliver a service, manage the recruitment process and assess a candidate's suitability for the role. The organisation may also need to process data from job applications to respond to or defend legal claims.
- 5.1 We process your personal data for particular purposes in connection with your employment or other engagement with us and the management and administration of our business.
- 5.2 We need to process your data to take steps, at your request, prior to entering into a contract with you. In some cases, we need to process data to ensure we are complying with legal obligations IE right to work in the UK before employment starts.
- 5.3 We seek information about criminal convictions and offences because it is necessary to fulfil our obligations in relation to safeguarding our young people.
- 5.4 Your information may be shared internally, for example with interviewing managers who are involved in the interview process. Recruitment processes are not based solely on automated decision making.
- 5.5 The organisation may share your data with previous employers and referees to obtain references prior to interview. If successful, your data will be shared with criminal records check providers. We may need to share your data with legal advisors and the Home Office to ensure it complies with immigration requirements.
- 5.6 We are required by law to always have a "lawful basis" (i.e. a reason or justification) for processing your personal data. There are **six** lawful bases for processing – they are set out in the law, and they are where:
- 5.6.1 the individual has given his or her consent to the processing.
 - 5.6.2 the processing of the individual's personal data is necessary to perform a contract with that individual or to take steps at the request of the individual before entering into a contract.
 - 5.6.3 the processing is necessary to comply with a legal obligation to which we are subject.
 - 5.6.4 the processing is necessary in order to protect the vital interests of an individual.
 - 5.6.5 the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; and
 - 5.6.6 the processing is necessary for our legitimate interests, provided those interests are not overridden by the individual's interests, rights or freedoms.
- 5.7 The table at [Schedule 2](#) sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.
- 5.8 If you would like more information on any of the purposes for which we process your personal data, please contact Vicky Dunicliffe at vicky.dunicliffe@ffc.ac.uk.
- 5.9 Please note that:
- 5.9.1 where our processing is based on your consent, **you can withdraw your consent** at any time. However, if you do not provide the information the organisation requires, we may not be able to process your application properly or at all.

- 5.10 In addition, where we have indicated in [Schedule 2](#) that our processing of your personal data is either:
- 5.10.1 necessary for us to comply with a legal obligation; or
 - 5.10.2 necessary for us to take steps, at your request, to potentially enter into an employment or other contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.

Sensitive personal data (including criminal data)

We are required by law to treat certain categories of personal data with even more care than usual. These are called special categories of personal data – and in this notice, we refer to them as “**sensitive personal data**”. For these categories of personal data, different lawful bases apply. The table at [Schedule 3](#) sets out the different purposes for which we process your sensitive personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one legal basis may be relevant – depending on the circumstances.

6. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction, or damage. For more information, you can contact Vicky Dunncliffe CEO at vicky.dunncliffe@ffc.ac.uk.

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

How long do we keep your personal data for?

- 6.1 We will only retain your personal data for a limited period of time. If your application is successful, the organisation will retain the information provided, within your confidential HR file. If your application is unsuccessful, all documentation relating to your application will normally be confidentially destroyed after 6 months.
- 6.2 You have the right to lodge a complaint with the Information Commissioner’s Office – for contact details click [here](#).

7. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice. We also encourage you to check this notice on a regular basis.

8. Where can you find out more?

If you have any queries about how Fairfield Trust processes your personal data, please contact Vicky Dunncliffe at vicky.dunncliffe@ffc.ac.uk.

Schedule 1

Categories of personal data

The table below sets out details of the personal data we collect and where we get it from. As you can see, we collect your personal information from you directly and sometimes we obtain it from other people and organisations.

Type of personal data	Collected from
a) Contact Information <ul style="list-style-type: none"> • Name(s) • Address(es) • Email address(es) • Contact details including mobile telephone number(s) 	You
b) Personal Information <ul style="list-style-type: none"> • Date of birth • Gender • Marital or relationship status • Age range 	You
c) Identity and Background Information <ul style="list-style-type: none"> • Details of education, training, qualifications, and results • Career history, experience, and skills • Identification (IE driving licence) • Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) • Curriculum Vitae (CV) or resume • Evaluative notes and decisions from job interviews • Preferences relating to job role • Social Media checks • References including disciplinary information and suitability to work with young people and vulnerable groups and suitability to work with children and vulnerable young people • Employment history and checks with previous employers 	<ul style="list-style-type: none"> • You • Your previous employers • Publicly available information from online resources including social media platforms.
d) Sensitive Personal Data (see section 0 for further information) <ul style="list-style-type: none"> • Racial or ethnic origin (including your nationality and visa information) • Criminal record information • Religious or philosophical beliefs • Sexual orientation • Information relating to actual or suspected criminal convictions and offences. • Sexual orientation • Disabilities 	<ul style="list-style-type: none"> • You • Disclosure and Barring service
e) Security, Location and Access Information <ul style="list-style-type: none"> • Information captured or recorded by electronic card access systems, CCTV, and other security control systems 	<ul style="list-style-type: none"> • You • Your use of Fairfield Trust security control systems

Schedule 2

Purposes for processing personal data

The table below sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Where our processing is necessary for our legitimate interests, those interests are the purposes listed below.

	Purposes of processing	Lawful basis We are permitted to process your personal data because...				
		1. You have given your consent to the processing	2. It is necessary to confirm your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section Error! Reference source not found.)	5. It is necessary to protect your vital interests (or those of someone else)
a)	Recruitment Activities					
1.	Seeking references and information from previous employers	✓		✓		
2.	Making a job offer to you and entering into a contract of employment with you		✓			
3.	Reviewing and confirming your right to work in the UK			✓		
4.	Conducting verification and vetting, including criminal background checks and social media checks (Note: may involve sensitive personal data)			✓		
5.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: may involve sensitive personal data)	✓		✓		
b)	General employment management and administration					
6.	Managing our health and safety compliance obligations			✓		

	Purposes of processing	Lawful basis				
		We are permitted to process your personal data because...				
		1. You have given your consent to the processing	2. It is necessary to confirm your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section Error! Reference source not found.)	5. It is necessary to protect your vital interests (or those of someone else)
7.	Determining whether any adjustments are necessary to enable you to carry out your role (Note: may involve sensitive personal data)		✓	✓		
8.	Preparing risk assessments to prevent injuries in the workplace			✓		
9.	Allocating and assigning responsibilities as necessary and measuring staff utilisation				✓	
10.	Supporting the establishment and maintenance of online and offline staff directories				✓	
c)	Security and governance					
11.	Monitoring the security of the Fairfield Trust's physical premises and systems, networks, and applications			✓	✓	
d)	Legal and regulatory compliance and responsibilities					
12.	Managing and administering our equal opportunities reporting (Note: may involve sensitive personal data)			✓		
13.	Compliance with obligations under the contract of employment between you and Fairfield Trust		✓			
e)	Fairfield Trust business operations					
14.	Analysing recruitment and HR-related objectives and results (for example, staff retention and turnover rates)				✓	
15.	Collecting feedback in relation to our recruitment and HR activities and processes for continuous improvement purposes				✓	

Schedule 3

Purposes for processing sensitive personal data

The table below sets out the different purposes for which we process your sensitive personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one legal basis may be relevant – depending on the circumstances.

Purposes of processing		Sensitive data lawful basis We are permitted to process your personal data because...					6. It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person or you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment to exercise our defence of legal claims	5. It is necessary for reasons of substantial public interest	
a) Recruitment Activities							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) General employment management and administration							
3.	Facilitating the administration of any pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Determining whether any adjustments are necessary to enable you to carry out your role		✓				
c) Security and governance							
5.	Identifying and authenticating employees and other individuals	✓					
6.	Identifying, investigating, and mitigating suspected misuse of Fairfield Trust's assets, systems, and platforms				✓		
d) Legal and regulatory compliance and responsibilities							
7.	Managing and administering our equal opportunities reporting					✓	

	Purposes of processing	Sensitive data lawful basis We are permitted to process your personal data because...					
		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person or you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment to exercise our defence of legal claims	5. It is necessary for reasons of substantial public interest	6. It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
8.	Investigating, evaluating, demonstrating, monitoring, improving, and reporting Fairfield Trust's compliance with relevant legal and regulatory requirements				✓		
9.	Responding to employment and industrial relations matters where permitted by applicable law				✓		