

Job Applicant Privacy Notice

Touchstone is committed to protecting and respecting your privacy and keeping your information secure. This privacy notice describes how we collect and use your personal information during and after the recruitment process in accordance with the General Data Protection Regulation (GDPR). This applies to people who apply for jobs with Touchstone

Touchstone 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.

By submitting your application and providing Touchstone with your personal information, you are agreeing to this privacy notice and giving us your consent to process your information.

If you do not consent, we will not be able to process your application. If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as safeguarding of the vulnerable people Touchstone supports).

Information we hold about you

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

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, addresses, phone numbers, and email.
- Date of birth.
- Gender.
- Recruitment information (including copies of right to work documentation, references and other information including application form as part of the application process).
- Photographs (i.e. copies of ID documents for checks_

We may also collect, store and use the following "special categories" information:

- Age, gender, disability, ethnicity, religious beliefs, sexual orientation.
- Information about your health, including any medical conditions.
- Information about criminal convictions and offences.

How we collect your information

We collect personal information about people applying for jobs through the application and recruitment process, either directly from candidates or from previous employers, sometimes from an employment agency or background check provider.

We may sometimes collect additional information from third parties including, credit reference agencies or other background check agencies, and may elect to conduct a search of your name and location (via a search engine such as Google by way of example only) to determine

your suitability for the role you have applied for. We may elect to take a screenshot of the results found, which would be kept with your application.

How we use your information

We must follow the rules of the law about how we look after your information and keep it safe. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, and fundamental rights do not override those interests.
- To make a decision about your recruitment or appointment.
- Determining the terms on which you may work for us.
- Checking you are legally entitled to work in the UK.
- Carrying out Disclosure and Barring Service (DBS) checks and Police Vetting checks for certain posts.
- Education, training and development requirements.
- To provide workplace adjustments.
- For equality and diversity monitoring.

We may also use your personal information in the following situations, which are rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Sharing your information

We will only share the personal information that you give us with third-party partner organisations who we carry out a joint recruitment process with. We will only provide these third-party organisations with the information necessary to enable them to assist us in carrying out the joint recruitment process.

With other third-party companies for purposes, such as but not limited to obtaining legal advice or carrying out DBS checking. We will only provide information where necessary to enable them to assist us or to comply with requirements of the third party organisation

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where processing is necessary to carry out our obligations and provided, we do so in line with our recruitment, safeguarding, confidentiality and data protection policies.

Less commonly, we may use information relating to criminal convictions where necessary in relation to legal claims, where it is necessary to protect your or someone else's interests, and you are not capable of giving your consent, or where you have already made the information

public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process, or we may be notified of such information directly by you when applying for the post. We will use information about criminal convictions and offences to carry out risk assessments in accordance with the job requirements, safeguarding in order to ensure that the individual and service users/carers and other appropriate individuals are protected.

We are allowed to use your personal information in this way as we work with vulnerable people and we use this information to ensure we carry out our statutory, legal and safeguarding obligations.

How we look after your information

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 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 Data Protection Officer.

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

How long we keep your information

We will retain your personal information for one year, unless you are appointed to a post within Touchstone, where we will keep this in line with the privacy statement for employees. In some circumstances we may be required to keep your information for a longer period in accordance with business requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

You have the right to:

- **Request access** to your personal information ("data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Complaints

You have the right to make a complaint at any time if you believe that Touchstone has infringed GDPR legislation because of the way your personal information has been handled.

Data complaints can be received in writing or verbally and must be sent to Information Governance. Touchstone reserves the right to verify the identity of the person making the complaint before processing the request or disclosing any information.

Complainants are expected to have exhausted organisational complaints processes prior to escalating matters to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Contact

The Data Protection Officer has responsibility for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the below.

- Phone: 0113 271 8277
- Email: InformationGovernance@touchstonesupport.org.uk
- Post: Touchstone House, 2-4 Middleton Crescent, Leeds, LS11 6JU

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.