

## Job Applicant Privacy Notice

**Data controller:** The Trussell Trust, Unit 9 Ashfield Road Trading Estate, Salisbury SP2 7HL

Reg. Charity in England & Wales (1110522) and Scotland (SC044246). Reg. Ltd. Co. in England & Wales (5434524).

**Data Protection Officer:** Tom Belshaw, [privacy@trussell.org.uk](mailto:privacy@trussell.org.uk)  
01722 580307

**As part of any recruitment process, Trussell collects and processes personal data relating to job applicants. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.**

### What information does the organisation collect?

Trussell collects a range of information about you. This includes:

- 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;
- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK;
- details of any relevant criminal convictions.

### How does the organisation collect this information?

We may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or résumés, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online assessments.

The organisation may also collect personal data about you from third parties, such as recruitment services, references supplied by former employers, information from employment background check providers and information from criminal records checks when applicable to the role.

### How does the organisation store this information?

Data will be stored in a range of different places, including on your application record, in HR management systems including third party recruitment platforms like BeApplied, and on other IT systems (including email correspondence).

### Why does the organisation process personal data?

The organisation 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, the organisation 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.

The organisation 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. The organisation may also need to process data from job applicants to respond to and defend against legal claims.

The organisation may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. The organisation processes such information to carry out its obligations and exercise specific rights in relation to employment.

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

The organisation will not use your data for any purpose other than the recruitment purposes described above.

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

Your information may be shared for the purposes of the recruitment exercise. This includes members of the People & Culture (HR) team, interviewers involved in the recruitment process (including third-party consultants for certain positions), relevant employees in the team with a vacancy, and IT staff, if access to the data is necessary for the performance of their roles.

The Trussell Trust uses third-party organisations to support our recruitment and equality and diversity activities (for example, BeApplied). We may share your personal information with third party organisations who will process it on our behalf. Where we use the services of third-party organisations for the above purposes we have in place contracts to ensure appropriate protection of your personal information and our processor will only ever act on our instructions.

If your application for employment is successful and Trussell makes you an offer of employment, then the organisation will share your data with former employers to obtain references for you. It may also share your data with employment background check providers to obtain necessary background checks, and the Disclosure and Barring Service to obtain necessary criminal records checks if applicable to the role.

We may transfer personal data we collect about you to the third parties described above who are located outside of the United Kingdom. In such cases, we will take appropriate measures to ensure your personal data remains protected to the standards described in this privacy notice. For example, by entering into contractual agreements based on regulator approved standard contractual clauses or relying on Binding Corporate Rules; ensuring our processors comply with similar standards of data protection law to that of the UK. If you have any questions or need more information regarding international transfers of your personal data, please contact us at [privacy@trussell.org.uk](mailto:privacy@trussell.org.uk)

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

Trussell takes the security of your personal 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. Restricted access to folders, password protection, and server security protects data kept in digital format; paper records are secured in locked filing cabinets in locked buildings to which access is limited to members of the People & Culture (HR) and finance teams.

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

If your application for employment is unsuccessful, the organisation will hold your data on file for six months after the end of the relevant recruitment process. At the end of that period, or if you object to the organisation's use your data during this time, your data will be deleted or destroyed unless it needs to be retained for legal purposes.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained for employment purposes.

### **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
- 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 the Data Protection Officer, whose contact details are listed at the beginning of this document.

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

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

Our purpose for processing this information is to assess your suitability for a role you have applied, for equalities monitoring, and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract. If you do not provide the information requested, the organisation may not be able to process your application properly or at all.

### **Automated decision-making**

Recruitment processes are not based solely on automated decision-making.