

# Candidate

# Privacy Notice

March 2023

# Welcome to High Speed Training's privacy notice for candidates

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during our recruitment process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this privacy notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

#### Who collects the information

High Speed Training Limited ('Company') is a 'data controller' and gathers and uses certain information about you.

### Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

# About the information we collect and hold

#### What information

#### Stage 1

We may collect the following information up to and including the shortlisting stage of the recruitment process:

- Your name and contact details (ie address, home and mobile phone numbers, email address)
- Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests
- Details of your referees, if provided by you
- Details of any health issues, if provided by you

#### Stage 2

We may collect the following information after the shortlisting stage, and before making a final decision to recruit:

- Interview details, including notes and technical assessment results
- Online or video meeting footage (only if used and if these are to be recorded you will be informed in advance)
- CCTV footage is recorded if you attend our premises
- Telephone calls are recorded

#### Stage 3

We may collect the following information once a job offer has been made, and before entering into a contract with you:

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers □
- ullet Information regarding your academic and professional qualifications  $\Box$
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information  $\Box$
- A copy of your driving licence (job role specific)
- Information to allow your identity to be verified, including name and address history and photographic ID
- Details of any health issues that we may reasonably need to make adjustments for
- Criminal records and offences information (job role specific)

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked ' $\square$ ' above to us to enable us to verify your right to work and suitability for the position.

A contract of employment will be issued subject to receiving satisfactory responses to the above.

#### How we collect the information

We may collect this information from you as part of the job application, your referees (details of whom you will have provided), your education provider, the relevant professional body, the Disclosure and Barring Service (DBS) and the Home Office.

#### Where we collect information from

- Applications (CV and cover letter) via our ATS from adverts on our website, third party job sites and social media.
- Speculative applications via our 'work for us' email address or social media inboxes
- Referred CV's to our HR email address
- Paper copies of CV's to the office or handed to us at careers fairs/events
- Agencies submitting CV's to vacancies
- Candidate profiles sourced from LinkedIn

# Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- to take steps to enter into a contract
- for compliance with a legal obligation
- for the purposes of our legitimate interests or those of a relevant third party (such as a Payroll or Benefits provider)
- because it is necessary for carrying out obligations or exercising rights in employment law
- for reasons of substantial public interest (ie equality of opportunity or treatment, promoting or retaining racial and ethnic diversity at senior level, preventing or detecting unlawful acts)
- to establish, exercise and/or defend any legal claims that may be brought by or against us in connection with your recruitment
- for security

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

#### How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as professional advisers. Usually, information will be anonymised but this may not always be possible (Identity checks or Payroll for example). The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information as required to comply with the law.

# Sensitive personal information and criminal records information

We do not routinely collect sensitive or special category data as part of our recruitment process. However, there may be occasions when a candidate makes us aware of, for example, a disability that requires reasonable adjustments to be made.

We carry out verification of identity checks for all candidates who are successful at interview.

In addition, for high profile or financial roles we carry out criminal record and offences checks. This special category of personal data is required as part of the disclosure checking process and is not used for any other purposes.

Further details on how we handle sensitive and special category personal information and information is set out in our privacy notices for staff and our data protection policy available through the Corporate Services team.

### Where information may be held

Information may be held at our offices and third party agencies, service providers, representatives and agents as described above.

## How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than 6 months after a vacancy closes, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our staff data privacy notice.

CCTV and call recordings are kept for a rolling 30 days.

Further details on our approach to information retention and destruction are available in our Data Retention Policy.

# Your right to object to us processing your information

Where our processing of your information is based solely on our legitimate interests (or those of a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact Peter Towell - Legal and Compliance Manager (and lead for internal data protection support) or our Data Protection Officer (DPO) - Stephen Murray <a href="mailto:stephen@thegredirector.co.uk">stephen@thegredirector.co.uk</a> - if you wish to object in this way.

# Your rights to correct and access your information and to ask for it to be erased

Please contact Peter Towell (compliance@highspeedtraining.co.uk) or our Data Protection Officer (DPO) Stephen Murray (stephen@thegrcdirector.co.uk) if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask us for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Peter Towell or our Data Protection Officer Stephen Murray will provide you with further information about the right to be forgotten, if you ask for it.

# Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## How to complain

We hope that Peter Towell or our Data Protection Officer Stephen Murray can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

We look forward to receiving your application to join our team at High Speed Training.