

# Job Applicant Privacy Notice



As an employer, **Imago** must meet its contractual, and administrative obligations. We are committed to ensuring that the personal data of our employees and volunteers is handled in accordance with the processing of personal data under the Data Protection Act 2018 and UK GDPR 2021.

This privacy notice tells you what to expect when Imago collects personal information about you as a job applicant.

Imago is the controller for this information unless this notice specifically states otherwise. Contact [dataprotection@imago.community](mailto:dataprotection@imago.community)

This notice works in conjunction with Imago's Data Protection Policy and general policies and procedures. We will review this privacy notice to cover any additional processing activities as required, and on a six-monthly basis.

It is important that the personal information we hold about you is accurate and current, if it is not then we will be breaching Data Protection Law. Please keep us informed if your personal information changes during your employment or involvement with Imago.

## Data protection principles

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

- **2.1** Used lawfully, fairly and in a transparent way.
- **2.2** Collected for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
- **2.3** Adequate, relevant and limited to the purpose we have told you about
- **2.4** Accurate and kept up-to-date.
- **2.5** Kept only for as long as necessary for the purposes we have told you about.
- **2.6** Processed in a manner that ensures appropriate security of the personal information.

## **What personal data we process and why**

We currently collect and process the following types of information as relevant to your relationship with Imago and stage of application:

- Personal contact details such as your name, previous names, address, contact telephone numbers (landline and mobile) and personal email addresses.
- Date of birth, gender, and NI number.
- Identification details and proof of address documents.
- Driving licence information used to carried out checks using online systems,
- Vehicle insurance details to ensure documentation includes business use where appropriate.
- Marital status.
- Next of kin, emergency contacts and their contact information.
- Employment and education history including qualifications, job application, employment references.
- Location of employment (Imago Office or external office base).
- Details of any secondary employment, political declarations, conflict of interest declarations or gift declarations.
- Right to work checks.
- UK DBS checks, and Certificates of Good Character checks for individuals who have lived overseas.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us:

- Directly from you.
- From an employment agency/DWP.
- From your employer, or education setting if you are on a work placement or a secondee.
- From referees, either external or internal.
- From Occupational Health and other health providers.
- From the DBS Service.

## **Special Category data collected:**

We may process “Special Category” or “Sensitive” data such as information regarding;

- Equal opportunity data including ethnic origin, sexuality, religious beliefs, disability
- Health and sickness information
- Citizenship information.

## **Criminal Conviction and Offences data:**

- Any criminal convictions that are identified and associated risk assessment.

We will only do this with explicit consent; in compliance with legal obligation, or to protect your vital interests (or someone else's interests) when you are not capable of giving your consent.

This information will often be stored and or processed anonymously i.e., not attached to any identifying information, allowing us to understand the demographics of the individuals working for Imago.

With your consent, we will use information about your physical or mental health or disability status to ensure your health and safety in the workplace to assess your fitness to work and to provide necessary adjustments.

## **We may share information in certain circumstances:**

- DBS clearance identifiers with organisations working with vulnerable people and children, where it is a requirement for all visitors or people using the premises to have a DBS in place e.g., Schools, GP Practices, Youth Provision, Residential Care.
- Where there is a legal requirement to do so e.g., law enforcement agencies.
- In accordance with Health and Safety Law, in the event of an accident.
- In accordance with safeguarding principles and policies.
- To make a barring referral

## Lawful Basis

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

<b>Lawful basis for processing your personal data depending on the processing activity. We rely on the following lawful basis for processing your personal data under the UK GDPR:</b>	
Article 6(1)(b)	relates to processing necessary for the performance of a contract.
Article 6(1)(c)	compliance with Imago's legal obligation as your employer.
Article 6(1)(d)	in order to protect your vital interests or those of another person.
Article 6(1)(e)	for the performance of our public task.
Article 6(1)(f)	for the purposes of our legitimate interest.
<b>Special category data. Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:</b>	
Article 9(2)(a)	your explicit consent
Article 9(2)(b)	relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
Article 9(2)(c)	to protect your vital interests or those of another person where you are incapable of giving your consent.
Article 9(2)(f)	for the establishment, exercise, or defence of legal claims.
Article 9(2)(g)	where processing is necessary for reasons of substantial public interest.
Article 9(2)(j)	for archiving purposes in the public interest.

## How we store your personal information:

Imago has appropriate security measures in place (in accordance with Article 32 of Data Protection Act 2018) to prevent personal information from being accidentally lost, used, or accessed in an unauthorised way. Imago limits access to individuals' personal information to those who have grounds to access it. Those processing information will do so only in an authorised manner and are subject to a duty of confidentiality.

Unsuccessful Job applicants' personal information will be held for a period of 12 months following the recruitment process. It will then be destroyed or deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact the Data Protection Team: [dataprotection@imago.community](mailto:dataprotection@imago.community)

## How to complain

If you have any concerns about our use of your personal information, please contact the data protection team [dataprotection@imago.community](mailto:dataprotection@imago.community)

You can also complain to the ICO if you are unhappy with how we have used your data.

### The ICO's address

Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow,  
Cheshire SK9 5AF

Helpline number: **0303 123 1113**

[www.ico.org.uk](http://www.ico.org.uk)