

# Job Applicant Privacy Notice

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## Document Control

Document Name	Job Applicant Privacy Notice
Abstract	This privacy notice describes how we collect and use personal information about you during the job application process, in accordance with the General Data Protection Regulation and Data Protection Act 2018.
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Version	Modification Date DD MM YYYY	Section	Brief description of change
1.0	25/05/2018	ALL	Job Applicant Privacy Notice published on the Volt.
2.0	05/11/2020	ALL Section 7 Section 12.2	Reviewed and updated to new format. Section for Covid-19 Pandemic response included. List of third-party service providers included.
2.1	19/08/2021	ALL Section 5 Section 12.2 Section 14	Review and minor updates in line with review cycle. Update to contact details and lawful bases. List of third-party service providers updated. Clarification on deletion and retention.
2.2	12/10/2022	Sections 5, 7, 9 and 14	Minor updates following annual review. Lawful basis for equal opps monitoring updated.

Distribution list
All Job Applicants at Electricity North West
Data Protection Steering Committee

## Contents

1	Purpose of this document.....	3
2	Data protection principles.....	3
3	Information we hold about you .....	3
4	How is your personal information collected? .....	4
5	Why does the organisation process personal data? .....	4
6	How we use information about you.....	5
7	Response to Covid-19 pandemic.....	5
8	Change of purpose .....	5
9	Your rights .....	6
	9.1 What we may need from you .....	6
	9.2 Right to withdraw consent .....	6
10	What if you do not provide personal data? .....	6
11	Automated decision-making .....	7
12	Data sharing .....	7
	12.1 Why might you share my personal information with third parties?.....	7
	12.2 Which third-party service providers process my personal information?.....	7
	12.3 How secure is my information with third-party service providers and other entities in our group?.....	7
	12.4 Transferring information outside the UK .....	8
13	Data security .....	8
14	Data retention .....	8
15	Data protection officer .....	8
16	Changes to this privacy notice .....	8

## 1 Purpose of this document

Electricity North West Limited is committed to protecting the privacy and security of your personal information and to being transparent about how we collect and use that data to meet our data protection obligations in compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018.

This privacy notice describes how we collect and use personal information about you during the job application process, in accordance with the UK General Data Protection Regulation (UK GDPR) and DPA 2018. It applies to all job applicants.

Electricity North West (referred to in this notice as “**we**”) is committed to protecting the personal data we hold about you. For the purposes of this notice, you are a “**candidate**”.

This notice explains what personal data we collect about you, why we need it, what we do with it and how long we keep it. We will only collect personal data about you, which is required for specific purposes and where there is a legal basis for processing it.

“**Personal data**” is information, or a combination of pieces of information that could reasonably allow an individual to be identified. Certain types of personal data are known as “**special categories of data**”. These are types of personal data which are considered particularly sensitive (including personal data relating to race, ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, genetic, biometric or health data).

“**Data controller**” is the Electricity North West or Electricity North West Group company that decides how and why your personal data is used. The Data Controller in relation to your personal data will usually be Electricity North West Limited, Borron Street, Portwood, Stockport, Cheshire SK1 2JD. There may be some variations to this in certain cases. In such instances, we will make you aware of this. If your application is successful, your employment contract will confirm which Group company you will be employed by and this will denote your Data Controller.

## 2 Data protection principles

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

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## 3 Information we hold about you

We collect 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.
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.
- Information on your ability to pass tests for security screening purposes in relation to the job applied for.

## 4 How is your personal information collected?

We collect personal information about you in a variety of ways. For example, data might be contained in application forms, CVs or resumés, obtained from your passport or other identity documents that you have provided to us, or collected through interviews or other forms of assessment, including online tests.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. We will seek information from third parties only once a job offer has been made to you and will inform you that we are doing so.

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

## 5 Why does the organisation process personal data?

We need to process data to take steps, at your request, during the recruitment process and in order to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

We process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out our obligations and exercise specific rights in relation to employment law.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done for the purposes of equal opportunities monitoring in our legitimate interests to ensure we are meeting our obligations as an inclusive and fair employer. Providing data for this purpose is entirely voluntary.

Once a job offer is made, we seek information about criminal convictions and offences for reasons of substantial public interest. We do this when it is necessary to carry out our obligations and exercise

specific rights in relation to employment and to comply with a regulatory requirement to establish whether or not an individual has committed an unlawful act or been involved in dishonest or other improper conduct.

If your application is unsuccessful, we will keep your personal data on file for a limited period in case there are future employment opportunities for which you may be suited. If you do not wish to be considered for future opportunities, you can delete your profile to ensure that contact will not be made by logging in to the online system. See Section 14 on Data Retention for more information about how long we keep your personal data.

## 6 How we use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. 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.

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

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

## 7 Response to Covid-19 pandemic

In light of the Covid-19 pandemic, we may process sensitive information relating to an individual's health where colleagues or applicants are symptomatic or receive positive test results. We may also need to advise colleagues, customers or other relevant contacts if they have been exposed to an individual who has tested positive for Covid-19. If you have, or are suspected to have, been in close contact with one of our colleagues, customers or other relevant contacts during the recruitment process, we may need to advise you or them if someone involved has tested positive for Covid-19.

Additionally, we may share details of cases with relevant third parties, particularly Public Health England or other Government departments. We will only process or share where this is permissible under Data Protection legislation or as required by law. In the majority of instances, this will be as a consequence of a legal obligation or for reasons of public interest in the area of public health.

## 8 Change of purpose

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 and that reason is compatible with the original purpose. 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.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 9 Your rights

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request.
- Ask us to change incorrect or incomplete data.
- Ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

In certain limited circumstances, you can also:

- Ask us 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 we are relying on our legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, you can do so by contacting [peopleservices@enwl.co.uk](mailto:peopleservices@enwl.co.uk).

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

### 9.1 What we may need from you

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.

### 9.2 Right to withdraw consent

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. To withdraw your consent, please contact People Services. 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.

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

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK as well as satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

## 11 Automated decision-making

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

## 12 Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK. If we do, you can expect a similar degree of protection in respect of your personal information.

### 12.1 Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### 12.2 Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. Below is a list of current providers who we share personal information with. This list may not include every provider we use, but we endeavour to keep this list up to date and accurate via regular reviews.

<b>Activity</b>	<b>Providers involved in the recruitment process</b>	<b>Providers involved in pre-employment process (once a role is offered)</b>
Recruiting staff and managing employment, including security and driving licence checks	Saville Assessment Limited Jobtrain Limited	Procius Limited Licence Bureau Limited
Payroll, pensions and staff healthcare and benefits		Medigold Health Consultancy Limited
Facilities, asset and fleet management		ALD Automotive Limited

### 12.3 How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 12.4 Transferring information outside the UK

We do not currently transfer the personal information of job applicants outside of the UK.

## 13 Data security

We take the security of your data seriously.

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, agents, contractors and other third parties 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.

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

## 14 Data retention

You can delete your online profile and application(s) at any time. This means you will no longer be considered for future employment opportunities and your personal data will be deleted from the online recruitment portal. However, limited data may continue to be held by us for 12 months in relation to the recruitment, shortlisting, interview and appointment process in our legitimate interests (see Section 5). Statistical data will also be retained in relation to any applications you have made to us. We will not be able to identify you from this data.

Your online profile and application(s) will remain active on the system for 12 months. At the end of this 12 month period, we will ask you if you wish for us to keep your data on the system for a further 12 month period for the purpose of considering you for future employment opportunities. At the end of the retention period or whenever you delete your online profile, your personal data will be deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in the appropriate privacy notice.

## 15 Data protection officer

We have appointed a data protection officer (DPO) and a data protection manager to oversee compliance with this privacy notice. If you have any questions about how we handle your personal information, please contact the Data Protection team at [dataprotection@enwl.co.uk](mailto:dataprotection@enwl.co.uk). You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## 16 Changes to this privacy notice

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. From time to time, we may also notify you in other ways about the processing of your personal information.

If you have any questions about this privacy notice, please contact [careers@enwl.co.uk](mailto:careers@enwl.co.uk).

*By choosing 'I accept' below, you acknowledge your personal data will be held and used as described above.*