



## Catalyst Housing Ltd

### Privacy statement for job applicants

May 2018

#### Key points:

- **Why do we use your data?** We use your personal information to consider your application for employment with Catalyst.
- **We use your sensitive data:** During the application process, we use information about your health, racial and ethnic origin, sexual orientation and religion.
- **Sharing data:** We may share your data with third parties, including third-party service providers, subsidiaries and other entities in the group.
- **Security:** We respect the security of your data and treat it in accordance with the law.

## 1 Purpose of our privacy notice

- 1.1 Under the data protection legislation, we are required to explain to job applicants why we are asking for information about you, how we intend to use the information you provide and whether we will share this with anyone else.
- 1.2 This statement applies to all job applicants and prospective employees (temporary, permanent or on a contract basis). We have a separate privacy statement which describes our use of employees' personal data.
- 1.3 We may update this statement at any time.
- 1.4 It is important that you read this statement so that you know how and why we use information about you. It is also important that you inform us of any changes to your personal information during your application process so that the information which we hold is accurate and current.

## 2 Who are we?

- 2.1 We are Catalyst Housing Ltd (**Catalyst**), one of the UK's leading housing associations and a member of the G15 group, with over 21,000 homes in London and the South East. We're here to make a purposeful difference, providing housing solutions and opportunities for those who can't afford a home without our help. We employ over 600 people based in locations across London and the South East.
- 2.2 Our head office and address is Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.
- 2.3 Catalyst is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.



### 3 Our Data Protection Officer

- 3.1 Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.
- 3.2 If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or by emailing: [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk)

### 4 Why are we collecting your information?

- 4.1 The information that you provide to us as part of your application, including information sent speculatively, will be used by us to assess your suitability for the job for which you are applying. Without this information, we may not be able to consider your suitability for a job with us.

### 5 What information are we collecting?

- 5.1 We collect information about you which is relevant to our consideration of your application for employment. This includes some or all of the following information :
- 5.1.1 **personal details** (such as name, date of birth, gender, marital status, national insurance number);
  - 5.1.2 **contact details** (such as your address, personal telephone number and personal email address);
  - 5.1.3 **confirmation of your identity** (such as photographs and a copy of your driving licence);
  - 5.1.4 **recruitment information** (such as copies of right to work documents, professional qualifications, language capabilities, training courses attended, references and other information included in a CV or cover letter or as part of the application process);
  - 5.1.5 **disciplinary and grievance information** (such as previous or ongoing professional or misconduct investigations);
  - 5.1.6 **information about your family and others** (such as dependants, next of kin and emergency contact numbers);
  - 5.1.7 **information about your previous employment** (such as job titles, work history, performance, attendance, conduct, working hours, training records, professional memberships, salary / compensation history); and
  - 5.1.8 any other information you provide to us during an interview.

#### ***Special categories of personal data***

- 5.2 Some of the information which we collect may be special categories of personal data (also called sensitive personal data). Special categories of personal data require a higher level of protection. The special categories of personal data about you which we may collect include:



- 5.2.1 information about your **race or ethnicity, religious beliefs, sexual orientation and political opinions** (for equal opportunity purposes);
- 5.2.2 information about your **health**, including any medical condition or disability; and
- 5.2.3 information about **criminal convictions and offences**.

## **6 Source of your personal information**

- 6.1 The above information which we collect about you will be obtained through a variety of sources which include:
  - 6.1.1 from you directly as part of the recruitment process, including through any psychometric evaluation or skill test; and
  - 6.1.2 from third parties as part of the recruitment process (such as employment agencies, background check providers, former employers, credit reference agencies and referees);

## **7 How and why we use your personal data**

- 7.1 We use the types of personal data listed above for a number of purposes, each of which has a "lawful basis". In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. There are a variety of different lawful bases for using personal data which are set out in the data protection laws.
- 7.2 We have set out below the different purposes for which we collect and use your personal data, along with the lawful bases we rely on to do so.
  - 7.2.1 To assess your skills, qualifications and suitability for the role you have applied for.
  - 7.2.2 To communicate with you in the most appropriate way during the recruitment process (for example, by providing documents in large print).
  - 7.2.3 To keep records of our hiring processes.
  - 7.2.4 To comply with our legal obligations such as to prevent fraud and equal opportunities monitoring.
- 7.3 The lawful basis on which we rely in order to use the information which we collect about you for the purposes set out above is that using your information in this way is necessary for us to take steps at your request prior to potentially entering into a contract with you.
- 7.4 In limited circumstances, when carrying out the above purposes we may also rely on the following lawful bases:
  - 7.4.1 using your information is necessary for us to comply with legal and regulatory obligations to which we are subject; or



- 7.4.2 using your information pursuant to our legitimate interests (and your interests and fundamental rights do not override those interests) to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.

## **8 How and why we use your special categories of personal data**

- 8.1 Some of the information which we collect will be special categories of personal data (also called sensitive personal data), such as information about your ethnic background or your health.
- 8.2 We will use your particularly sensitive personal information in the following ways and based on the following lawful bases:
  - 8.2.1 to consider whether we need to provide appropriate disability adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview, to comply with our legal obligations as an employer and where it is needed in the public interest (such as equal opportunities monitoring); and
  - 8.2.2 we will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## **9 How we use information about criminal convictions**

- 9.1 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. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.
- 9.2 Where appropriate, we will collect information about criminal convictions as part of the recruitment process, such as background and reference checks, where applicable, including Disclosure and Barring Service checks and checking you are legally entitled to work in the UK.
- 9.3 Where necessary and authorised by law, we will use information about criminal convictions and offences to assess your suitability for the role you have applied for.
- 9.4 We are allowed to use your personal information in this way to carry out our obligations as your potential employer.
- 9.5 Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where you have already made the information public or in the course of legitimate business activities with the appropriate safeguards.

## **10 What may happen if you do not provide your personal information?**

- 10.1 If you refuse to provide certain information when requested, we may not be able to process your application successfully, or we may be prevented from complying with our legal obligations (such as the requirement to ensure the health and safety in our workplace).



## **11 Complying with data protection law**

- 11.1 We will comply with data protection law. At the heart of data protection laws are the "data protection principles" which say that the personal information we hold about you must be:
- 11.1.1 used lawfully, fairly and in a transparent way;
  - 11.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
  - 11.1.3 relevant to the purposes we have told you about and limited only to those purposes;
  - 11.1.4 accurate and kept up to date;
  - 11.1.5 kept only as long as necessary for the purposes we have told you about; and
  - 11.1.6 kept securely.

## **12 Sharing your information**

- 12.1 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.

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

- 12.2 "Third parties" includes third-party service providers (including contractors and designated agents), subsidiaries and other entities within our group. The following activities are carried out by third-party service providers:
- 12.2.1 psychometric testing companies, for the purposes of carrying out testing to support the recruitment process; and
  - 12.2.2 recruitment agencies and/ or employment agencies where you have chosen to be represented by an agency for the purpose of managing your application and providing feedback.

### ***When might you share my personal information with subsidiaries and other entities in the group?***

- 12.3 We will share your personal information with subsidiaries and other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.

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

- 12.4 All our third-party service providers, subsidiaries 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.

***What about other third parties?***

- 12.5 We may share your personal information with other third parties, for example in the context of the possible sale or transfer of services. We may also need to share your personal information with a regulator or to otherwise comply with the law.

**13 Transferring your information abroad**

- 13.1 We will not transfer the information you provide to us outside of the European Economic Area.

**14 Security of your information**

- 14.1 The information that you provide will be stored securely on our systems. Our security measures and procedures reflect the seriousness with which we approach security and the value we attach to your information.

- 14.2 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. Details of these measures may be obtained from our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

- 14.3 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.

**15 Can we use your information for any other purpose?**

- 15.1 We typically will only use your personal information for the purposes for which we collect it. It is possible that we will use your information for other purposes as long as those other purposes are compatible with those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

- 15.2 We may use your personal information without your knowledge or consent where such use is required or permitted by law.

**16 Storing your information and deleting it**

- 16.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

- 16.2 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.



- 16.3 If your application is unsuccessful, we will retain your personal information for a period of 6 months after we have communicated to you our decision.
- 16.4 If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.
- 16.5 If your application is successful, we shall retain your personal data in line with our privacy policy for employees. Any personal data obtained through the recruitment process not relevant to your role as an employee of Catalyst will be retained for a period of 6 months after your commencement date as an employee.
- 16.6 We retain your personal information for the periods set out above so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After these periods, we will securely destroy your personal information in accordance with our data retention policy.

## **17 Your rights**

- 17.1 Under certain circumstances, by law you have the right to:
  - 17.1.1 **Request access** to your personal information (commonly known as a “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.
  - 17.1.2 **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.
  - 17.1.3 **Request erasure** of your personal information in certain circumstances. 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 (see below).
  - 17.1.4 **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) or public interest as our lawful basis for processing and there is something about your particular situation which leads you to object to processing on this ground. You also have the right to object if we are processing your personal information for direct marketing purposes.
  - 17.1.5 **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.
  - 17.1.6 **Request the transfer** of your personal information to another party in certain circumstances.
- 17.2 If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information



to another party, please contact our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

## **18 Right to withdraw consent**

- 18.1 In the limited circumstances where we are relying on your consent as our lawful basis to process your data 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 our Data Protection Officer by writing to The Data Protection Officer, Catalyst Housing, Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU or emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk). 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.

## **19 Automated decision making**

- 19.1 You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## **20 Right to complain to the ICO**

- 20.1 You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## **21 Changes to this privacy statement**

- 21.1 We reserve the right to update this privacy statement at any time, and we will provide you with a new privacy statement 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.