



## Catalyst Housing Ltd and Aldwyck Housing Group Limited

### Privacy statement for job applicants

1 May 2019

#### Key points:

- **Why do we use your data?** We use your personal information to consider your application for employment with us.
- **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:

2.1.1 Catalyst Housing Ltd (**Catalyst**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU; and

2.1.2 Aldwyck Housing Group Limited (**Aldwyck**), registered office Ealing Gateway, 26–30 Uxbridge Road, London W5 2AU.

2.2 Any reference to “we”, “our” or “us” in this statement is a reference to both Catalyst and Aldwyck.

2.3 We are "data controllers", meaning that we are responsible for deciding how we hold and use personal information about you.

## 3 The merging of Catalyst and Aldwyck

3.1 Catalyst and Aldwyck are merging. In the short term, Catalyst and Aldwyck will remain as two separate entities, with Aldwyck a subsidiary of Catalyst. Eventually, Catalyst and Aldwyck will combine to create a single entity.

3.2 This privacy statement explains how your personal information will be effected during the merger process (i.e. whilst Catalyst and Aldwyck are two separate entities), which we expect to be finalised by April 2021. Once the merger is complete, we will provide you with an updated privacy statement.

3.3 If you are **applying for a job with Aldwyck**, your personal information will be gradually migrated to Catalyst during the merger process, and that information may be processed by Catalyst:

3.3.1 as Catalyst’s and Aldwyck’s information systems are gradually merged;

3.3.2 where your application is successful and this sharing is necessary in order for you to work alongside Catalyst employees to carry out your job role; or

3.3.3 where this is necessary for any of the reasons set out at paragraph 8 below.

3.4 If you are **applying for a job with Catalyst**, your personal information will remain on Catalyst's systems and will not be transferred to Aldwyck. During the merger process, your information may be accessed and/or used by Aldwyck:

3.4.1 as Catalyst's and Aldwyck's information systems are gradually merged;

3.4.2 where your application is successful and this sharing is necessary in order for you to work alongside Aldwyck employees to carry out your job role; or

3.4.3 where this is necessary for any of the reasons set out at paragraph **Error! Reference source not found.** below.

#### 4 **Our Data Protection Officer**

4.1 Our Data Protection Officers are responsible for overseeing what we do with your information and monitoring our compliance with data protection laws.

4.2 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)

#### 5 **Why are we collecting your information?**

5.1 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.

#### 6 **What information are we collecting?**

6.1 We are collecting information about you which is relevant to our consideration of your application for employment. This includes some or all of the following information :

6.1.1 **personal details** (such as name, date of birth, gender, marital status, national insurance number);

6.1.2 **contact details** (such as your address, personal telephone number and personal email address);

- 6.1.3 **confirmation of your identity** (such as photographs and a copy of your driving licence);
- 6.1.4 **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);
- 6.1.5 **disciplinary and grievance information** (such as previous or ongoing professional or misconduct investigations);
- 6.1.6 **information about your family and others** (such as dependants, next of kin and emergency contact numbers);
- 6.1.7 **information about your previous employment** (such as job titles, work history, performance, attendance, conduct, working hours, training records, professional memberships, salary / compensation history); and
- 6.1.8 any other information you provide to us during an interview.

***Special categories of personal data***

- 6.2 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:
  - 6.2.1 information about your **race or ethnicity, religious beliefs, sexual orientation and political opinions** (for equal opportunity purposes);
  - 6.2.2 information about your **health**, including any medical condition or disability; and
  - 6.2.3 information about **criminal convictions and offences**.

**7 Source of your personal information**

- 7.1 The above information which we collect about you will be obtained through a variety of sources which include:
  - 7.1.1 from you directly as part of the recruitment process, including through any psychometric evaluation or skill test; and

7.1.2 from third parties as part of the recruitment process (such as employment agencies, background check providers, former employers, credit reference agencies and referees).

## 8 How and why we use your personal data

8.1 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.

8.2 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.

Why we use your information	Our lawful basis for using your information
<p>To <b>assess your skills, qualifications and suitability</b> for the role you have applied for, including, where necessary and authorised by law, reviewing your criminal convictions and offences to assess your suitability for a particular role.</p>	<p><b>Contract:</b> It is necessary in order for us to take steps to enter into an employment contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your potential employer.*</p>
<p>To <b>communicate with you</b> in the most appropriate way during the recruitment process (for example, by providing documents in large print).</p>	<p><b>Contract:</b> It is necessary in order for us to take steps to enter into an employment contract with you.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your potential employer.*</p>
<p>To keep <b>records</b> of our hiring processes.</p>	<p><b>Contract:</b> It is necessary in order for us to take steps to enter into an employment contract with you.</p>

Why we use your information	Our lawful basis for using your information
	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p>
<p>To comply with our <b>legal obligations</b> such as to prevent fraud.</p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your potential employer.*</p>
<p>To consider whether we need to provide <b>appropriate disability adjustments</b> 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).</p>	<p><b>Contract:</b> It is necessary in order for us to take steps to enter into an employment contract with you.</p> <p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your potential employer.*</p> <p><b>Health:</b> It is necessary to assess the working capacity of potential employees*.</p>
<p>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 <b>equal opportunity monitoring and reporting.</b></p>	<p><b>Legal obligations:</b> It is necessary to meet legal / regulatory obligations.</p> <p><b>Employment:</b> It is necessary for us to carry out our rights and obligations as your employer.*</p>
<p>* This is an additional lawful basis which we need to rely on in order to use special categories of data such as information about your health</p>	

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

- 9.1 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).

## **10 Complying with data protection law**

- 10.1 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:
- 10.1.1 used lawfully, fairly and in a transparent way;
  - 10.1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
  - 10.1.3 relevant to the purposes we have told you about and limited only to those purposes;
  - 10.1.4 accurate and kept up to date;
  - 10.1.5 kept only as long as necessary for the purposes we have told you about; and
  - 10.1.6 kept securely.

## **11 Sharing your information**

- 11.1 We will share your personal information with third parties where we have a lawful basis for doing so.
- 11.2 The types of organisations with whom we share your personal data are as follows:
- 11.2.1 information technology providers, who host online systems which enable us to manage applicant information, including HR management;
  - 11.2.2 psychometric testing companies, for the purposes of carrying out testing to support the recruitment process;
  - 11.2.3 recruitment agencies, where you have chosen to be represented by an agency for the purpose of managing your application and providing feedback;
  - 11.2.4 the police and other law enforcement agencies for the purpose of detection and prevention of crime;

- 11.2.5 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, for system maintenance support and hosting of data;
- 11.2.6 third parties in the context of the possible sale or transfer of services in which you are involved; and
- 11.2.9 organisations with a function of auditing and / or administering public funds for the purpose of detection and prevention of fraud.

## **12 Transferring your information abroad**

- 12.1 We will not transfer your information outside of the European Economic Area.

## **13 Security of your information**

- 13.1 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.
- 13.2 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).
- 13.3 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.

## **14 Can we use your information for any other purpose?**

- 14.1 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.

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

## **15 Storing your information and deleting it**

- 15.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.
- 15.2 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.
- 15.3 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.
- 15.4 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.
- 15.5 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 will be retained for a period of 6 months after your commencement date as an employee.
- 15.6 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.

## **16 Your rights**

- 16.1 Under certain circumstances, by law you have the right to:

- 16.1.1 **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.
  - 16.1.2 **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.
  - 16.1.3 **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).
  - 16.1.4 **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.
  - 16.1.5 **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.
  - 16.1.6 **Request the transfer** of your personal information to another party in certain circumstances.
- 16.2 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 by emailing [data.protection@chg.org.uk](mailto:data.protection@chg.org.uk).

## 17 Right to withdraw consent

- 17.1 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.

17.2 Where we are relying on your consent to process your data, 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).

17.3 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.

## **18 Automated decision making**

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

## **19 Right to complain to the ICO**

19.1 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.

## **20 Changes to this privacy statement**

20.1 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.