

Recruitment Privacy Policy

Place2Be is committed to your privacy where we handle your personal data in the course of a job application and this privacy policy ("Policy") sets out the basis on which any of your personal data will be collected, stored and used by us for the purposes of evaluating your candidacy for employment. Personal data here means any information that we collect about you that relates to you or that can be used to identify you. References to "Place2Be", "we" or "us" in this Policy are to Place2Be, a company limited by guarantee (company number: 02876150) and a charity registered in England and Wales (registered charity number: 1040756) and Scotland (registered charity number: SC038649) with its registered office address at 175 St. John Street, London, EC1V 4LW. Place2Be is the controller of your personal data (this means we are responsible for your personal data).

You can read the Privacy Notice on our main website here: Place2be.org.uk/privacy

If you have any questions about this privacy notice or how we handle your personal data, please contact our Data Protection Officer at 175 St John St, London, EC1V 4LW or by emailing Privacy@Place2Be.org.uk.

Personal Data We Collect

We collect the following categories of personal data about you:

- **Contact Information**, such as name, address, email address and telephone number.
- **Personal Characteristics**, such as age, gender, languages spoken, immigration status, nationality and citizenship, marital status, details of eligibility to work, and career responsibilities.
- **Identity Information**, such as photograph and passport details, confirmation you have a driving license, a copy of your driving license/national identity card,
- **Education and Training Information**, such as schools attended, exams taken, degrees and certificates obtained, academic results, and extracurricular activities.
- **Talent Management Information**, such as your job application form, cover letters, resume/CV information, referee details and references (including extra information that your referees choose to tell us about you), details of any background checks (including DBS/PVG check results and unspent criminal convictions), results of any pre-employment assessment exercises, employment preferences, previous employment, tasks and responsibilities.
- **Diversity Information**, such as sex, sexual orientation, racial or ethnic origin, religious or other similar beliefs, physical or mental health.

Please note that providing any personal data to us is optional, however, if you fail to provide personal data when requested, which is necessary for us to consider your application (e.g., evidence of qualifications or work history), we may not be able to process your application further.

How We Collect Your Personal Data

We collect your personal data in three primary ways:

- **Personal data that you give to us**

This includes information that you give us when you create an account through our online recruitment portal or otherwise engage with us in the recruitment process.

- **Personal data that we receive from other sources**

We collect your personal data from the following third-party sources:

- your named referees (who you provide as part of your application);
- referrals (where you have been referred to us by a third party for potential employment such as a recruiter or friend of yours who works with us);

- publicly available sources (such as your public profile on job boards or professional networks such as LinkedIn, where it is lawful to do so and if we think you may be a good fit for a job role with us);
- third party service providers undertaking background checks.

How We Use Your Personal Data

We only use your personal data for the purposes of managing our recruitment related activities, which include:

- Registering and maintaining your online recruitment account on our website, including providing you with related user support to help you resolve any issues you have with your account and contacting you in relation to your account.
- Assessing your skills, qualifications, and suitability for a job role with us;;
- Setting up and conducting recruitment interviews and tests, and evaluating and assessing results;
- Carrying out background and reference checks, if applicable;
- Communicating with you about the recruitment process;
- Ensuring you have a legal right to work in the country;
- Making any reasonable adjustments/accommodations to our recruitment processes to account for disabilities or medical conditions;
- Equal opportunity monitoring;
- Keeping records related to our recruitment and hiring processes;
- Analysing and understanding our online applicants as a group so that we can provide a better recruitment service.

Lawful Bases for Processing Your Data

Under data protection law, we can only use your personal data where we have a lawful reason or justification (also known as a lawful basis). We rely on the following lawful basis for processing your personal data:

- **Performance of Contract.** We process your personal data throughout the recruitment process for the purposes of performing a contract with you or to take steps at your request before entering a contract where you have reached out to us directly and expressed an interest in a job role (e.g. by applying for a job role through an online recruitment account on our website), or where we (or a third party on our behalf) have contacted you about a potential job role and you have otherwise communicated your interest in the role.
- **Legal Obligation.** We process some of the personal data we collect about you for the purposes of complying with our legal obligations in relation to the hiring and recruitment process. For example, we have a legal obligation to ensure you are legally entitled to work in the country and this is why we ask for this information. We have a legal obligation to ensure that no one starts working at a school without full DBS/PVG clearance (these are criminal record disclosure checks). We also have a legal obligation to make reasonable adjustments/accommodations to our recruitment process where you have informed us of any disabilities (this simply means we may need to alter the recruitment process to ensure you have an equal employment opportunity.
- **Legitimate Interest.** In other cases, processing your personal data is necessary to further Place2Be's legitimate business and commercial interests, provided these interests do not infringe on your fundamental rights. Our relevant legitimate business and commercial interests include:

- Where you simply create an online recruitment account with us without applying for any job role, we rely on our legitimate interest in processing your personal data for registering, maintaining your account, and contacting you in relation to your account with us.
- Where we receive your personal data other than directly from you (e.g., from publicly available sources or referrals), prior to you expressing an interest in a job role with us, we rely on our legitimate interest in appointing a suitable candidate for the job role to process your personal data. We also rely on this legitimate interest in considering you for a job role other than the one you have applied for, where you give us permission to. This is for the purposes of assessing your skills, qualifications, and suitability for the role, and reaching out to you to gauge your interest in the role.
- Our legitimate interest in carrying out equal opportunity monitoring using diversity information you provide, to promote equality and diversity in the workplace.
- Our legitimate interest in analyzing your use of your online recruitment account with us to improve our recruitment services.

We may also collect, store and process sensitive personal data about you during the recruitment process including health related data if we carry out pre-employment health checks, data collected for equal opportunity monitoring or data on any criminal offences (where we carry out background checks, for example). This personal data benefits from special protections under data protection law and we only collect and use this information either where we have your explicit consent, we are required to process this personal data by law, it is necessary for the purpose of establishing, making or defending legal claims or we are otherwise entitled to process this personal data under law.

Who do we share your data with?

We share your personal data with the following parties:

- Our third-party recruitment services provider who manage our online recruitment platform, and other information technology services providers, as well as those who provide and support our management and data storage systems;
- Recruiters/ recruitment agencies, where they are involved in the recruitment process;
- Our employees, only if they are part of the interview panel/process (e.g. hiring managers and HR staff);
- Our occupational healthcare provider where we carry out pre-employment health checks;
- Our professional advisers, such as our HR consulting and legal advisers, where they require that information in order to provide advice to us;
- Regulatory or public authorities we may be subject to for the purpose of demonstrating compliance with applicable law and regulations. We may also be obliged by law to disclose personal data to law enforcement agencies and applicable regulators, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us; and
- To a prospective or new owner of our business or company and their advisors, should we, or any Place2Be entity, be the subject of a takeover, divestment or acquisition.

International transfers of your personal data

We are located in the United Kingdom and store your personal data in the United Kingdom.

How long do we keep your personal data?

We will not keep your personal data for longer than is necessary for the purposes for which we have collected it (this will generally be for the purposes of maintaining your account with us, the duration of time necessary to evaluate your candidacy for employment with us and to protect our legal interests). When determining the relevant retention periods for your personal data we will take into account the following factors: (a) any permissions you give us with regards to your personal data; (b) our contractual obligations and rights in relation to the personal data involved; (c) our legal obligation(s) under relevant laws to retain data for a certain period of time; (d) our legitimate interests; (e) whether retention is advisable in light of our legal position (such as with regard to applicable statute of limitations, investigations, litigation, and other potential and actual disputes); and (f) any guidelines issued by relevant data protection authorities.

If you have not taken a job with us, after 12 months of non-usage of your online recruitment account we will contact you and ask you if you want to keep your details on our database. If you do not respond to three communications from us to ask if you want to keep your details on our database, or otherwise indicate by signing in to your Place2Be's online recruitment account that you wish your details to be retained on our database, we will delete or anonymise your account (including associated records). You may also delete your account at any time in the 'Administer Your Account' section of your Place2Be online recruitment account. This does not affect your rights as set out below (see the 'What are your rights?' section).

How do you unsubscribe from future mailings?

If you have Place2Be online recruitment account, you can stop receiving emails by updating 'My Details' section. This does not affect your rights as set out below (see the 'What are your rights?' section).

What are your rights?

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your personal data and can exercise any of these rights by contacting us at privacy@place2be.org.uk. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

You have the following rights in relation to your personal data:

- **Request access to your personal data (commonly known as a “data subject access request”).** This enables you to access and receive a copy of the personal data we hold about you, along with supplemental transparency information similar to what is provided in this Policy, and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have us correct your personal data if it is incomplete or inaccurate.
- **Request erasure of your personal data.** This enables you to have us delete or remove personal data where there is no good reason for us continuing to process it or where you have successfully exercised your right to object to our processing of your personal data.
- **Request to object to processing of your personal data.** You have the right to object to us processing your personal data where we do so for one of the following four reasons: (i) because it is within our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.

- **Request the restriction of processing of your personal data.** This enables you to have us suspend any **further** use of your personal data, for example, if you want us to establish its accuracy or the reason for processing it.
- **Request portability of your personal data.** This enables you to request we provide you or another party with any personal data we have obtained from you, in a structured, machine readable and reusable format.
- **Withdraw consent to the processing of your personal data.** You have the right to withdraw your consent at any time where we rely on your consent as a lawful basis for processing your personal data. This won't affect anything we have used your personal data for before you withdraw your consent.
- **Not be subject to decisions based solely on automated processing (including profiling) which have a legal effect on you or a similarly significant effect on you.** This is relevant where we decide to use automated systems to process your personal data with no real human involvement. We do not currently engage in this type of processing activity.
- **Lodge a complaint with a data protection regulator.** You have the right to lodge a complaint about the way we handle or process your personal data with a national data protection regulator or supervisory authority. In the UK, this is the Information Commissioner's Office (ICO). For further details on how you can contact them, please see their website: [Information Commissioner's Office \(ICO\)](#).

Changes To This Privacy Policy

Any changes to this Policy, either due to business reasons or future changes in legislation, will be posted on this page and so we recommend that you revisit this page regularly as you continue to interact with us. We will notify you of any substantial changes where we have a relationship with you and may promote such changes on the website.

Last Updated: July 2023