

The Representative Body of the Church in Wales

Diocese of St Asaph

Privacy Notice for Job Applicants

What information do we hold about you, what will we use it for and what are our legal bases for doing so?

As part of the recruitment and selection process we will obtain certain personal information from you. Some information will be provided in the job application form and further information may be provided by you and recorded by us during any interview process. This information will include:

- Your name, address and contact details*
- Your sex
- Your education and qualifications*
- Your skills, experience and membership of professional bodies*
- Your National Insurance number*
- Evidence of your ability to work in the UK*
- Information provided from your previous employer(s) and other referees
- Other personal information you might provide on your application form or monitoring form and/or during any interview and selection process

Some of the personal data requested will be because of a legal or contractual requirement to obtain and use the information or it is necessary for the information to be provided in order to be able to enter into a contract with you (this information is noted with an * above). Failure to provide certain information will prevent us from engaging you or from performing the contract entered into with you.

We use the information we hold for the purposes of recruitment and selection, to comply with and demonstrate compliance with employment law and best practice and any other applicable laws.

Our legal bases for processing your information for the above purposes are that the processing is necessary for us to comply with our legal obligations and/or the processing is in our legitimate interests.

Our specific legitimate interests are:

- To provide and demonstrate a fair and reasonable recruitment process;
- To employ the best candidates for the roles we have available;
- To comply with and demonstrate compliance with our legal obligations as an employer and any other applicable laws; and/or
- [To comply with and demonstrate compliance with our policies and procedures relating to job applicants.]

What Special Category Personal Information do we hold about you?

We also keep certain sensitive or special category personal information in relation to you which might be relevant to your employment, such as your:

- racial or ethnic origins
- political opinions

- religious or philosophical beliefs
- membership of a trade union
- physical or mental health (including details of any disability)
- sex life or sexual orientation
- details of any disability
- information as to your commission of criminal offences including the results of Disclosure and Barring Service ('DBS') checks (where applicable)

What will we use your Special Category Personal Information for and what are our legal bases for doing so?

We will use the sensitive or special category information we hold for the following purposes:

- To monitor equality and diversity

In this case the condition we rely upon for processing the information is to monitor equality and diversity which is necessary for reasons of substantial public interest, namely for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

- To make any reasonable adjustments required to the recruitment process to comply with the Equality Act 2010;
- To comply with and demonstrate compliance with employment law and best practice and any other applicable laws.

In these cases, the conditions we rely upon for processing the information are because it is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of employment law.

- To assess your suitability for a role where a particular religious belief is a genuine occupational requirement

Where the role you are applying for is one where a particular religious belief is a genuine occupational requirement, applying for the role will reveal your religious or philosophical beliefs. In this situation the condition we will rely upon for processing the information is that the processing is carried out in the course of the legitimate activities of the St Asaph DBF as a not for profit organisation with a religious aim.

- To assess suitability for a role where a DBS check is applicable

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. Where appropriate, we will collect information about criminal convictions as part of the recruitment process.

We will only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary for reasons of substantial public interest, namely, preventing or detecting unlawful acts, safeguarding, protecting the public against dishonesty, preventing fraud or suspicion of terrorism or money laundering.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

In cases where a claim has been brought against the St Asaph DBF or there is a potential risk of a legal dispute or claim we may need to process your special category personal information where it is necessary for the establishment, exercise or defence of legal claims.

There may be circumstances where we need to process your special category personal information, particularly relating to your health, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

We do not carry out any automated decision-making or profiling in relation to you.

Who do we share your information with?

We may need to share your personal information with the referees you have provided on your application form [and/or with education, professional and vocational establishments to verify information you have provided on your application form or during any interview process].

We may also need to share your personal information where we are legally obliged to do so, and/or with the Police, local authorities, the courts and any other government department if they ask us to do so (but only if us doing so is lawful) and/or with our professional advisors when they need it to give us their professional advice.

International Transfer of Your Information

We do not transfer any of your personal data outside the European Economic Area.

How long do we keep your information for?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place.

In most cases, this means that information gathered as part of the recruitment exercise will usually be retained for 6 months after the recruitment exercise has been completed. In the case of a successful applicant, information which is relevant to the on-going employment relationship will be transferred to the employee's employment record and retained in accordance with the periods applicable for employees. Please refer to our personal data and retention schedule for further information <https://www.churchinwales.org.uk/privacy-notice/>.

Individual rights

Data protection legislation provides individuals with a number of different rights in relation to their data. These are listed below and apply in certain circumstances:

- **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.

- **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.
- **Request erasure** of your personal information. 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).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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.
- **Request data portability** of your personal information. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

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 Head of Legal Services.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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.

There are other rights which you also may be able to exercise, such as the right to have inaccurate personal data rectified, to object to the processing of personal data, to the erasure of personal data or to have the processing of your personal data restricted as well as the right to have electronic personal data made portable. All these rights are subject to certain conditions and exemptions.

About us

Our full name is the St Asaph Diocesan Board of Finance.

We are the controller of the information you provide us with and we hold about you. The term “controller” is a legal phrase used to describe a person or entity that controls the way personal data is used and processed.

Where to get more information about your data protection rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

Contact us

You're welcome to get in touch with us to discuss your information at any time.

The Diocesan Secretary has overall responsibility for data protection. If you have any questions about this privacy notice or how we handle your personal information, please contact the Diocesan Secretary at the Diocesan Office, High Street, St Asaph LL17 ORD 01745 582245
<https://stasaph.churchinwales.org.uk/>