



Online Recruitment Privacy Policy

Why do we have a privacy policy?

Place2Be is committed to privacy for everyone who accesses this site. Under the UK version of the General Data Protection Regulation (EU) 2016/679 which is part of UK law by virtue of the European Union Withdrawal Act 2018 (the "GDPR"), and the Data Protection Act 2018 (the "DPA"), we must comply with certain requirements which are designed to ensure that any data you provide to us is processed with due care and attention.

This Policy explains what we do with your personal data when you create an account with us as part of our recruitment process and describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you.

This Policy is non-contractual and we may amend it from time to time. Please visit this page if you want to stay up-to-date, as we will post any changes here.

By creating an account with us as part of our recruitment process, you acknowledge the terms of this Policy and the use and disclosure of your personal data as set out in this Privacy Policy.

What sort of data do we collect?

Place2Be collects personal data about you to help in the recruitment process. This data consists of information which may include your:

- name;
- age;
- marital status;
- contact details such as address, e-mail address, and telephone number;
- work and education history;
- CV;
- photograph;
- referee details and references;
- immigration status;
- nationality and citizenship;
- passport details/a copy of your driving licence or national identity card;
- diversity information including sex, racial or ethnic origin, religious or other similar beliefs, physical or mental health;
- extra information that your referees choose to tell us about you;
- details of any criminal convictions;

- your responses to and the results of assessments administered through the website, as well as any details of your eligibility to work; and
- health data such as COVID-19 vaccination status and/or COVID-19 test results (a separate privacy policy will be provided at the time we collect this information, stating what information is collected, and why).

Please note that the above list is not exhaustive.

Why do we process this personal data?

We process this personal data as necessary to aid the recruitment process. We may also use data collected in our system to help us to understand our users as a group so that we can provide you with a better service. We collect, and process sensitive personal data only so far as is necessary to ensure we conform with legal requirements, for example equal opportunity laws. For information on our legal bases for processing your personal data, please see 'Legal bases for processing your data' below.

How do 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 and any other data you send to us.

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

This may include any information obtained from third party sources such as LinkedIn, Twitter and Google Plus, as well as any information obtained from recruitment agencies, referees or third party service providers undertaking background checks.

- **Personal data that we collect automatically**

We may also collect certain information from you indirectly as a result of online behaviour, including:

- Technical information such as the internet protocol (known as IP) address used to connect your computer to the internet, your log-in information, time of access, date of access, time zone setting, web page(s) visited, software crash reports, type and version of browser used, browser plug-in types and versions used, and operating system and platform to ensure the security of your account and to verify that the person operating your account is you;
- Your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our websites (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call out customer service team; and
- Information about your computer or device allowing us to analyse trends, administer our websites, track your web navigation, and gather broad demographic information for aggregated use.

To do this we may use cookies (pieces of data sent by a website to your computer and stored on its hard drive). Please see below for more information about how we use cookies.

Who do we share your data with?

We may share your personal data with recruitment agencies.

How is this data safeguarded?

The security of your data is extremely important to us. We will take all reasonable precautions necessary to protect your personal data from misuse, interference and loss, and unauthorised access, modification or disclosure.

This includes, for example, the protection of passwords using industry standard encryption, measures to preserve system security and prevent unauthorised access and back-up systems to prevent accidental or malicious loss of data. We may use third party data storage providers to store personal data electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment. Access to your personal data is only provided to our staff who help us to process data, in order to help with the recruitment process.

Unfortunately, there is always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.

If you suspect any misuse or loss of or unauthorised access to your personal information please let us know immediately by contacting privacy@place2be.org.uk.

How do we let you know if our policy changes?

Any policy changes, either due to business reasons or future changes in legislation, will be posted on this page or, if substantial, may be promoted on the website or through e-mail notification.

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, unless we believe that the law or other regulation requires us to keep it (for example, because of a request by a tax authority or in connection with any anticipated litigation) or if we require it to enforce our agreements.

Applicants who are unsuccessful either at the application stage or after their interview can request to have their data deleted from our systems. If a request is made, this will be deleted once 6 months has lapsed from the date of their application. Alternatively, applicants may wish to wait until the 12 month consent period expires and request for their data to be removed. If you have accepted a role with us, your details will be retained for 6 years from the date you leave Place2Be and your data will be handled in accordance with our staff privacy policy. 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 is our policy on Cookies?

Cookies are small data files sent by a website to your computer that are stored on your hard drive when you visit certain online pages of our website.

Cookies allow the website to identify and interact with your computer (for example so we can remember your login details if you have opted to 'stay signed in'). We do not use cookies to retrieve information that was not originally sent by us to you in a cookie.

You can set your browser to accept or reject all cookies, or notify you when a cookie is sent. If you reject cookies or delete our cookies, you may still use our websites, but you may have reduced functionality and access to certain areas of our websites or your account.

In addition to the express notice provided on our website when you first visit, your continued use of our website is your acceptance of our continued use of cookies on our website.

What are your rights?

One of the GDPR's main objectives is to protect and clarify the rights of UK citizens and individuals in the UK with regards to data privacy. Even if we already hold your personal data, you still have various rights in relation to it, which we have set out below.

To get in touch about these rights, please contact us. We will seek to deal with your request without undue delay, and in any event within one month (subject to any extensions to which we are lawfully entitled). Please note that we may keep a record of your communications to help us resolve any issues which you raise.

The GDPR gives you the following rights in relation to your personal data:

- **Right to object:** this right enables you 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.
- **Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities, you may withdraw this consent at any time and we will cease to carry out that particular activity that you previously consented to unless we consider that there is an alternative legal basis to justify our continued processing of your data for this purpose, in which case we will inform you of this condition.
- **Data Subject Access Requests (DSAR):** You may ask us to confirm what information we hold about you at any time, and request us to modify, update or delete such information. We may ask you for more information about your request. If we provide you with access to the information we hold about you, we will not charge you for this unless your request is "manifestly unfounded or excessive". If you request further copies of this information from us, we may charge you a reasonable administrative cost. Where we are legally permitted to do so, we may refuse your request. If we refuse your request we will tell you the reasons for doing so.
- **Right to erasure:** You have the right to request that we "erase" your personal data in certain circumstances. Normally, the information must meet one of the following criteria:
 - the data are no longer necessary for the purpose for which we originally collected and/or processed them;
 - where previously given, you have withdrawn your consent to us processing your data, and there is no other valid reason for us to continue processing;
 - the data has been processed unlawfully (i.e. in a manner which does not comply with the GDPR);
 - it is necessary for the data to be erased in order for us to comply with our obligations as a data controller under UK law; or
 - if we process the data because we believe it necessary to do so for our legitimate interests, you object to the processing and we are unable to demonstrate overriding legitimate grounds for our continued processing;
- We would only be entitled to refuse to comply with your request for erasure for one of the following reasons:
 - to exercise the right of freedom of expression and information;

- to comply with legal obligations or for the performance of a public interest task or exercise of official authority;
 - for public health reasons in the public interest;
 - for archival, research or statistical purposes; or
 - to exercise or defend a legal claim.
- When complying with a valid request for the erasure of data we will take all reasonably practicable steps to delete the relevant data.
 - **Right to restrict processing:** You have the right to request that we restrict our processing of your personal data in certain circumstances. This means that we can only continue to store your data and will not be able to carry out any further processing activities with it until either: (i) one of the circumstances listed below is resolved; (ii) you consent; or (iii) further processing is necessary for either the establishment, exercise or defence of legal claims, the protection of the rights of another individual, or reasons of important public interest.
 - The circumstances in which you are entitled to request that we restrict the processing of your personal data are:
 - Where you dispute the accuracy of the personal data that we are processing about you. In this case, our processing of your personal data will be restricted for the period during which the accuracy of the data is verified;
 - Where you object to our processing of your personal data for our legitimate interests. Here, you can request that the data be restricted while we verify our grounds for processing your personal data;
 - Where our processing of your data is unlawful, but you would prefer us to restrict our processing of it rather than erasing it; and
 - Where we have no further need to process your personal data but you require the data to establish, exercise, or defend legal claims.
 - If we have shared your personal data with third parties, we will notify them about the restricted processing unless this is impossible or involves disproportionate effort. We will, of course, notify you before lifting any restriction on processing your personal data.
 - **Right to rectification:** You also have the right to request that we rectify any inaccurate or incomplete personal data that we hold about you, including by means of providing a supplementary statement.
 - **Right of data portability:** If you wish, you have the right to transfer your personal data between data controllers. In effect, this means that you are able to transfer the details we hold on you to another employer or a third party. To allow you to do so, we will provide you with your data in a commonly used machine-readable format so that you can transfer the data to another employer. Alternatively, we may directly transfer the data for you. This right of data portability applies to: (i) personal data that we process automatically (i.e. without any human intervention); (ii) personal data provided by you; and (iii) personal data that we process based on your consent or in order to fulfil a contract.
 - **Right to lodge a complaint with the Information Commissioner's Office:** You also have the right to lodge a complaint with the Information Commissioner's Office. You can contact them in the following ways:
 - Phone: 0303 123 1113

- Email: casework@ico.org.uk
- Live chat
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

If you would like to exercise any of these rights, or withdraw your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), please contact privacy@place2be.org.uk. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Legal bases for processing your data

We have to have lawful reasons for holding personal information. The reasons that are deemed to be lawful are set out in the GDPR and the DPA, and the ways in which we are lawfully able to process your data are:

- where using your data is in our legitimate interests, to ensure the smooth running of our recruitment process;
- where you give us consent to use your personal data, as long as that consent is given freely and without pressure, and where you are kept fully informed;
- where processing your personal data is necessary to establish, exercise or defend legal claims;
- where processing your personal data is necessary for us to carry out our legal obligations, including our employment and social security law obligations and/or; and
- where processing your personal data is necessary for us to ensure our compliance with our equal opportunities obligations.

What are our charity's details?

Registered office address: Place2Be, 175 St. John Street, London, England, EC1V 4LW Tel: 020 7923 5500.

Registered charity number 1040756 (England and Wales) SC038649 (Scotland). Registered Company number 02876150.

You can read the Privacy Notice on our main website here: place2be.org.uk/privacy

Terminology

Archiving - this is the process where candidate users are asked if they want their personal data to remain on the Place2Be's online recruitment database. As explained above, if a user does not indicate that they wish their details to be retained, their record is deleted from, or anonymised in, our database. This means that the candidate will not be able to sign in to Place2Be's online recruitment account and also means that their details will not be accessible by Place2Be's Recruitment Team. Please note this process is carried out in accordance with the data protection laws.

Data - information which is being processed by equipment operating automatically in response to instructions given for that purpose, is recorded with the intention that it should be processed by means of such equipment, is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system or forms part of an accessible record.

UK General Data Protection Regulation (the "GDPR"), and the **Data Protection Act 2018** (the "DPA") - these laws set out the principles relating to the use of personal data to ensure that the rights of the person who is the subject of the data are protected under the law.

Personal data - means any information relating to an identified or identifiable natural person ('data subject');

Place2Be - Registered charity number 1040756 (England and Wales) and SC038649 (Scotland). Registered Company number 02876150.

Privacy policy - this statement by Place2Be which explains the ways that we try to protect our users' data.

Recruitment process - the process of gaining employment and recruiting new staff or counsellors on placement and the ongoing administrative process involved once a user has gained paid employment or a placement.

Sensitive personal data - this is "special categories of personal data" for the purposes of the GDPR, which consists of information as to the racial or ethnic origin of the data subject, political opinions, religious beliefs or other beliefs of a similar nature, membership of a trade union, physical or mental health or condition, sexual life, the commission or alleged commission of any offence or any proceedings related to any offence.

Third parties - these are companies and people other than Place2Be.

Usage of data in the system - this is when all data is collected and processed as a total to enable us to look at such information as demographic and geographic trends, so that we can try to produce a better service in the future.

Users - people who use our website and register their details with us for the purposes of recruitment, either to gain paid employment or a placement.

