

Privacy Notice: Job Applicants

Who are we?

Transform Housing & Support is committed to protecting the privacy and security of your personal information.

Any personal data we collect about you will be strictly in accordance with UK Data Protection Legislation (including the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018). As a data controller we are responsible for deciding how we hold and use personal information about you.

This privacy notice tells you what to expect when we collect and store personal and sensitive information. It tells you about the purposes for which we will process your personal information and the legal basis for the processing ('processing' includes us keeping your personal information).

In this notice, whenever you see the words 'we', 'us', 'our', or 'Transform", it refers to Transform Housing & Support.

Please find below our registration numbers:

- ICO registration number: ZA 1600063
- Registration charity number: 264133
- Company limited by guarantee registered in England and Wales: 01057984
- Registered provider of social housing: H2452.

Who the personal data relates to

This privacy notice tells you what to expect as an applicant for a job.

What type of personal data is collected

Recruitment

- We process the following types of data about you:
- your name and contact details
- identity information such as your date of birth and gender

- your previous experience and education
- information about you on publicly available sources such as LinkedIn
- your referees
- answers to questions relevant to the role you have applied for
- notes from interviews
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- any other additional information provided by you in the context of the recruitment and selection process.

Conditional offers

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the UK and seek assurance as to their trustworthiness, integrity and reliability.

You will therefore be required to provide:

- proof of your identity (you will be asked to attend our office with original documents, e.g., passport, driving license, and or birth certificate. We will take copies of these).
- proof of qualifications where relevant to the job – you will be asked to attend our office with original documents (we will take copies of these).
- proof of identity (e.g., we will request you to bring in a household bill that was issued no longer than 3 months ago e.g., electricity, water and or gas bill. We will take copies of these.)
- References – we will contact your referees directly using the details you provide in your application, to obtain references from your former employers.
- Occupational health clearance – we will ask you to complete a questionnaire about your health, which will help determine if you are suitable to undertake the work that you have been offered or advise us if any adjustments are needed to the work environment or systems so that you may work effectively.
- Criminal records check – for some roles, Transform is obliged to seek information about criminal convictions and offences because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment. You will be advised if a DBS check is applicable to this role and if so, you will be asked to complete an application for an appropriate level of Disclosure and Barring (DBS) check. You will be required to submit your DBS Certificate once received, for checking by your Hiring Manager. The role will influence the level of DBS check required. Dependent on the level of check, your certificate might detail both unspent and spent convictions amongst other information. Once viewed, no record of your certificate will be held by Transform other than confirmation that it has been viewed and is acceptable for the role.

You will be asked to attend our office with original documents, and we will take photocopies. We will contact your referees, using the details you provide in your application, to obtain references and information on your trustworthiness, integrity and reliability. Your referees may be asked to follow up questions on these areas if anything is unclear or uncertain.

Confirmed, unconditional offers of employment

We will process the following:

- comments, queries or concerns you have in relation to the offer being made and our response(s) to such correspondence
- bank details to process salary payments
- HMRC starter checklist to ensure you are placed on the right tax code and where applicable, capture any student loan data
- emergency contact details so we know who to contact in case you have an emergency at work.

Unsuccessful candidates

If you are unsuccessful following either shortlisting or interview/assessment for the position you have applied for, we will only keep the personal data you provided for the application process for a period not longer than 12 calendar months from when we last processed your application.

We may on occasion ask if you would like your details to be retained in our talent pool for the purposes of contacting you in the future, should other suitable vacancies arise. This would be for an initial period of 12 months after which we would contact you again to ask the same question. Should we receive no response to this request then your details will be removed.

For further information, please contact us.

How we use your personal data

We need to process data to take steps at your request prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal obligations. For example, we are required to check a successful applicant's eligibility to work in the UK before employment starts. The Housing Act also requires us to identify any connections between you and the organisation prior to job offer.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Transform may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to job applicants with disabilities and for health and safety purposes). For instance, we may need to make reasonable adjustments to the recruitment process for candidates who have

a disability. For physically demanding roles, a condition of the job offer is that the chosen candidates are required to undergo a pre-employment medical assessment to ensure they are suitably fit and able to carry out the requirements of the role.

For some roles, we are obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for it to carry out our obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, religion or belief, age, gender or marital status, this is done purely for the purposes of equal opportunities monitoring with the explicit consent of job applicants, which can be withdrawn at any time.

We will not use your data for any purpose other than the recruitment exercise for which you have applied. If your application is unsuccessful, Transform may wish to contact you regarding future employment opportunities for which you may be suited. We will ask for your consent before it keeps your data for this purpose, and you are free to withdraw your consent at any time.

How we share your personal data

Your information will be shared internally for the purposes of the recruitment exercise. This may include members of the HR team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with former employers to obtain references, and the Disclosure and Barring Service to obtain necessary criminal record checks where relevant.

Your data may be transferred to countries outside the United Kingdom for recruitment purposes e.g., request for employment references.

International data transfers

Your personal data may be transferred outside the UK. We will ensure that all international transfers comply with applicable data protection laws by implementing appropriate safeguards in compliance with Chapter V UK GDPR.

For example, when we appoint data processors, we check that suitable arrangements are in place such as Adequacy Regulations, binding corporate rules, international data transfer agreements, standard contractual clauses, or other permitted mechanism.

The restricted transfers we make include transferring personal data to the EU (Germany and Ireland), New Zealand, and the US under the UK extension of the EU:US Data Privacy Framework and/or standard contractual clauses. Further information about the safeguards related to the international transfers we make can be provided on request.

For further information, please contact us using our details at the end of this notice.

How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential 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.

If your application for employment is unsuccessful, we will hold your data on file for one year after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed with the exception of equality monitoring information (e.g. ethnicity, disability, age, sexual orientation, religion, gender) which is stored separately from your job application record. The equality information is completely anonymised and cannot be attributed to an individual person. This information is not deleted and is retained for equality and diversity statistical and monitoring purposes only.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a colleague and volunteer privacy notice.

For further information, please contact us – details are provided below.

Your rights

Under UK data protection law, you have rights including:

- **Your right of access** - You have the right to ask us for copies of your personal information.
- **Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.
- **Your right to withdraw consent** - If the lawful basis for processing is consent, you have the right to withdraw that consent at any time. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than

your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

- **Your right to object to direct marketing** - Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
- You also have the **right to object** to and not to be subject to a decision based solely on automated processing including profiling. We do not carry out automated processing or profiling. To exercise any of these rights, please contact us – details are provided below.

Making a complaint

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or online at www.ico.org.uk/concerns.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Use of cookies

Like many websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow the website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. Navigate to our Cookie Policy page to manage your consent preferences and to understand more about how we collect and store cookies.

Links to other websites





Our website may contain links to other websites run by other organisations. This privacy notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies of other sites (even if you access them using links found on our site).

Changes to our privacy policy

We may update this Privacy Notice from time to time by posting an amended version on our website. If at any time we decide to use your personal data in a different manner than was stated at the time it was collected, we will notify you directly via email.

Our Contact Details

If you have any questions in relation to this document or how we use your personal data they should be sent to:

 <p>Bradmere House Brook Way Leatherhead Surrey KT22 7NA</p>	 <p>01372 387 100</p>
 <p>gdprinfo@transformhousing.org.uk</p>	 <p>Contact us Transform Housing & Support</p>

Our **Head of Governance & Assurance, Mandy Arnold**, can be contacted on:
01372 387124.

Data Protection Officer

We are supported in our compliance with, and management of, data protection matters by:

Data Protection People Limited
Round Foundry Media Centre
Foundry Street
Leeds LS11 5QP
Tel: 0345 340 5412

Signature: 

Date: 14 February 2025

Record of Change History

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	Chief Executive	14 February 2025

The privacy notice was last updated in February 2025 and subsequently will be updated to reflect changes either to the way in which we operate or changes to data protection legislation. We will bring any significant changes to your attention but to make sure that you keep up to date, we suggest that you revisit this notice from time to time.