

Title:	Recruitment Privacy Notice
Person responsible:	Director of Customer & Culture
Customer consultation arrangement:	Consultation required? Yes ☐ No ☒ If no, explain why: Policy not customer facing
EIA required:	Yes – see here
EIA completed (date):	April 2025
Approved by:	Senior Leadership Team
Business Strategy Theme	Quality Services, Quality People
Approval date:	April 2025
Links to other key policies:	Data Protection and Data Privacy Policy Colleague Privacy Notice
Review date:	April 2026

Document management		
Version	Date amended	Amendments
1	March 2023	Original
2	April 2025	New format. Updates to categories of personal data processed, who data is disclosed to, international data transfers, DPO contact details and purposes for processing to reflect operations. Policy review cycle updated too annual.
3	August 2026	Updated following SLT restructure and changes to roles, responsibilities, and job titles.

1. Protecting your privacy

- 1.1 South Lakes Housing (SLH) are committed to respecting your privacy. This privacy notice explains how SLH uses personal data we collect during the recruitment process. It explains how SLH comply with the law on data protection and what your rights are as a data subject. This notice applies to applicants for SLH job vacancies.

2. About us

- 2.1 As defined under Article 4(7) of the UK GDPR, SLH are the data controller of any personal data collected and processed when you apply for a role.

References to “we,” “our” or “us” in this privacy notice are to SLH of Bridge Mills Business Centre, Stramongate, Kendal, Cumbria, LA9 4BD. Our contact number is 0300 303 8540.

3. What personal data do we process?

- 3.1 When you apply for a role with SLH, you will provide us with personal data about yourself. This is typically provided through an online application form. We may also obtain information via third party recruitment agencies, former employers, credit reference agencies and other background check agencies.

Personal data we process may include but is not limited to:

- Contact details such as name, title, address, telephone number and email address
- Date of birth
- CV
- Answers to application, interview and test questions
- Other personal details collected during the recruitment process, or other information that you otherwise voluntarily provide to us

SLH may process the following ‘Special Category’ personal data:

- Ethnicity
- Religious Beliefs
- Sexual Orientation
- Health Information

Any special category data we do process is done on one of the following lawful bases:

- The processing is necessary for reasons of substantial public interest
- It is necessary for the establishment, exercise, or defence of legal claims
- It is based on explicit consent
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law

Additional data relating to Protected Characteristics under the Equality Act 2010 (sex, gender identity, marital status) will also be processed for the purpose of equal opportunities monitoring.

As an applicant, if you are providing us with details of referees, they have the right to know what personal data we hold about them, how we use it, and how we might share that information. Please share this Privacy Notice with them. They also have the same rights as set out in the ‘Your Rights in Relation to Personal Data’ section of this notice.

4. How we use your personal data

- 4.1 The table below describes the main purposes for which we process your personal data and the lawful basis for being able to do so. Conditions under the UK GDPR/ Data Protection Act 2018 for processing Special Category or Criminal Offense personal data are in *italics*.

Purpose	Personal Data	Lawful Basis
Managing the recruitment and selection process	All personal data relevant to decision the recruitment & selection process	Legitimate interest; Contract (processing necessary to enter into a contract); <i>Article 9(b) Employment, Social Security and Social Protection</i>
Communicating with you regarding the vacancy	Contact data	Legitimate Interest; Contract (processing necessary to enter into a contract)
Checking you are legally entitled to work in the UK	Contact data & identity data	Legal obligation
To carry out checks and determine your eligibility to undertake particular types of work	Criminal convictions and offences data	Legal obligation; Contract (processing necessary to enter into a contract); <i>Article 9(2)(b) Employment, social security and social protection law</i>
Equality and Diversity Monitoring	All special categories of personal data; data relating to Protected Characteristics listed in Section 3	Consent; <i>Article 9(a) Explicit Consent Article 9(j) Archiving, research and statistics</i>
Contacting you about other vacancies	Contact data, CV, assessment/interview responses	Consent
Responding to and defending any claims that may arise from the recruitment process	All personal data provided relevant to the claim	Legal Obligation; Legitimate Interest; <i>Article 9(f) Legal claims or judicial acts</i>

Under the lawful basis of legitimate interest, processing your data allows SLH to run recruitment processes; operate and keep records of candidates who have applied for a role and ensure effective general HR and business administration.

For some of your personal data we process, you will have a legal or pre-contractual obligation to provide us with your personal information or it will be necessary for us to process it to comply with our recruitment processes. If you do not provide us with the required personal data, we may not be able to

properly perform, enter into a contract with you or comply with legal obligations. As a result we may have to terminate the recruitment process or withdraw your offer of employment.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the 'Contact us' section of this notice.

5. Disclosure of your personal data

5.1 We may share your personal data with the following parties:

- Background check agencies, for employment and criminal checks
- Current/previous employers (where specified as a reference)
- Chosen recruitment agencies
- Any other party approved by you
- Providers who facilitate the submission of online applications (i.e. Survey Monkey)

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations
- In connection with legal proceedings (or where we are instructed to do so by Court order)
- To protect the vital interests of an individual (in a life or death situation)

SLH holds information sharing agreements/data processing agreements where we share information regularly with organisations; this ensures that data shared is processed in accordance with the law.

6. Transferring your data internationally

6.1 SLH uses Survey Monkey to facilitate the collection of data through the online application process. Processing of this data involves transfer to Ireland. This is permitted as an international transfer as UK adequacy regulations are in place for the territory.

7. How long do we keep your personal data?

7.1 Employee records for current employees are kept indefinitely on their personnel file and/or as electronic records. Certain employee records are required by law to be kept for 6 years and this is the maximum amount of time that any employee record will be retained after they have left SLH.

As standard, data relating to unsuccessful applications for a role is retained for 6 months. Once the due date for destruction has been reached, the data is securely destroyed either through confidential waste shredding or by a reputable data destruction company.

If you are unsuccessful with your application, we may retain your data for longer than 6 months if you consent to us contacting you about future vacancies which may be of interest. Your consent for this arrangement is freely given, will be reviewed on a regular basis and can be withdrawn at any time.

If you would like more specific information regarding retention of your information, please email HR@southlakeshousing.co.uk.

8. Your rights in relation to personal data

8.1 Under the UK GDPR you have the following rights concerning your data:

Your right to be informed

You have the right to be informed about:

- How we use your information
Why we collect your information
- How long we keep your information
- Who we will share your information with

Right of Access

You have the right to obtain confirmation from SLH as to whether personal data concerning you are being processed and, where that is the case, access to that data.

Right to Rectification

You have the right to oblige SLH to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.

Right to Erasure

You have the right (under certain circumstances, but not all) to oblige SLH to erase personal data concerning you.

Right to Restriction of Processing

You have the right (under certain circumstances, but not all) to oblige SLH to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.

Right to Data Portability

You have the right (under certain circumstances, but not all) to oblige SLH to provide you with the personal data about you which you have provided to SLH in a structured, commonly used and machine-readable format.

You also have a right to oblige SLH to transmit those data to another controller.

Right to Withdraw Consent

If the lawful basis for processing is consent, you have the right to withdraw that consent.

Right to Object to Direct Marketing

SLH does not use your data for direct marketing purposes so this right does not apply.

Rights in relation to automated decision making and profiling

SLH does not perform any automated decision-making based on personal data that produces legal effects or similarly affects you.

Your right to lodge a complaint with a supervisory authority

If you wish to exercise any of your rights concerning your personal data, you should contact SLH's Data Protection Officer at the address shown in the 'Contact Us' section of this notice.

If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

(t) 0303 123 1113

(e) casework@ico.org.uk

While this privacy notice sets out a general summary of your legal rights in respect of personal data, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the 'Contact us' section of this notice.

9. Changes to this notice

- 9.1 SLH will review this notice on an annual basis or more frequently if warranted by changes in legislation or operations.

Where required by law, we will seek your consent to changes in the way we use your personal information.

10. Contact us

- 10.1 In the event of any query or complaint in connection with the information we hold about you, the contact details for our Data Protection Officer are:

John Mansergh, Deputy Chief Executive
Bridge Mills Business Centre
Stramongate
Kendal
LA9 4BD
Phone Number: [0300 303 8540](tel:03003038540)
E-mail: governanceteam@southlakeshousing.co.uk