

## **Recruitment Data Protection Policy Document 05**

**In respect of**

**Collaborative Project Management Services Limited  
(CPMS)**

**Dated: 25 May 2019**

### **1. Introduction**

This document sets out the measures to be taken by CPMS, a company registered in England under number 07882661, whose registered office is 25 Finsbury Circus, London, EC2M 7EE (“we”, “us”, “our”) in respect of recruitment.

### **2. Data protection principles**

We will comply with the data protection principles, when gathering and using personal information, as set out in our Data Protection Policy.

### **3. About the information we collect and hold**

We seek to ensure, that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

**4. Information we hold up to and including the shortlisting stage**

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process  Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome  To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process  Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision  The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interviewer will receive non-anonymised details
Your name contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process  Legitimate interest: if you are unsuccessful in your application, your details may be passed on to an associated company to see if they have any suitable vacancies	To see whether an associated company has any suitable vacancies.
Your racial or ethnic origin, sex and sexual orientation, religious or similar	From you, in a completed anonymised equal opportunity	To comply with our legal obligations and for reasons of substantial public interest (equality of	To comply with our equal opportunities monitoring obligations and to follow our equality and other

beliefs	monitoring form	opportunity or treatment)	policies For further information, see * below
Information regarding your criminal record	From you, in your completed application form	To comply with our legal obligations For reasons of substantial public interest	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

## 5. Information we hold before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/>	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel

Information regarding your academic and professional qualifications <input type="checkbox"/>	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) <input type="checkbox"/>	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract Legitimate interest: to verify the criminal records information provided by you	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/performance the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence	From you	To enter into/performance the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer
<b>A sentinel database check</b>	CPMS will carry	To comply with our	

<b>will take place along with a record review</b>	out	legal obligations. to verify the qualifications information provided by you	
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You are required, (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

**6. Where information may be held**

Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above.

**7. How long we keep your information**

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as; race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see our Employee data protection policy.

**8. Your rights to correct and access your information and to ask for it to be erased**

Please contact our Data Protection Officer (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask our Data Protection Officer for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our Data Protection Officer will provide you with further information about the right to be forgotten, if you

ask for it.

**9. Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

**10. How to complain**

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

This Policy has been approved and authorised by:

**Position:** Operations Director

**Date:** 25 May 2019 Rev1

**Due for review by:** 24 May 2020